

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 2:22:47 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07\_0127 MOD 5 (D490/17)  
[http://www.pac.nsw.gov.au/resources/pac/media/files/pac/projects/2017/11/invincible-colliery-southern-extension-modification-07\\_0127-mod-5/department-of-planning-and-environments-assessment-report/assessment-report.pdf](http://www.pac.nsw.gov.au/resources/pac/media/files/pac/projects/2017/11/invincible-colliery-southern-extension-modification-07_0127-mod-5/department-of-planning-and-environments-assessment-report/assessment-report.pdf)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region.

The Commission rejected open-cut mining in this 50 hectare area in 2013 and 2014, and should do so again now. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC, Please refuse Manildra's proposed mine expansion and prevent further open-cut mining in the Gardens of Stone region. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. In time, this region has great tourism potential for Lithgow city.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Adrian Spragg

Adrian Spragg

[REDACTED]

Tuesday, November 21, 2017 - 14:22

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 8:13:25 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Alex Mateer

[REDACTED]

Thursday, November 16, 2017 - 08:13

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 8:04:52 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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Yours sincerely,

Alice Wood

Alice Wood

A black rectangular redaction box covering the signature area.

Wednesday, November 22, 2017 - 20:04

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 11:14:55 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

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- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Alison stubbings

Alison stubbings

[Redacted signature]

Wednesday, November 22, 2017 - 23:14



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 2:09:46 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Amanda Drinkwater

[REDACTED]

Sunday, November 19, 2017 - 14:09

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 6:34:37 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Amanda Lissarrague  
[REDACTED]

Amanda Lissarrague  
[REDACTED]

Saturday, November 18, 2017 - 18:34

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 11:57:47 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Andrew Wills

[REDACTED]

Sunday, November 19, 2017 - 11:57

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 8:40:24 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
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Yours sincerely,  
Ann Leahy

Ann Leahy



Saturday, November 18, 2017 - 20:40



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 7:24:41 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,  
Anna Ossig

Anna Ossig



Tuesday, November 21, 2017 - 07:24

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 7:52:44 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

I

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal

I will add to this that I own a property in Lithgow, which some would suggest means that I believe in the need for continued coal mining in the area, this could not be further from my position.

I believe that the continued mining of coal for the production of electricity is not of any long term benefit, frankly it is short sighted and dangerous, on so very many levels.

Yours sincerely,  
Anthony Cahill

Anthony Cahill

[REDACTED]

Tuesday, November 21, 2017 - 19:52

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 13 November 2017 7:33:20 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

This submission opposes the Department of Planning and Environment recommendation - Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

I request this PAC uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

This is another incredibly significant, long term decision required by our society. Previous versions of these coal mines have sown that do not properly remediate the natural environment in these areas and there is no appropriate "offsetting".

The desperate efforts in coal mining are reaching their limits and these industries need to move on and develop new methods of steel and energy production and resource recovery. Any company that is not doing this does not deserve to any further license for environmental destruction through extractive processes.

When contemplating your decision consider the multi-generational societal point of view, where people will ask "Why did we destroy our natural beauty and heritage for short term wealth?"

I also wish to take the time to support the Colong Foundation points:

1. It is inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest.
2. Although Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.
3. Financially, coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account.
4. Manildra's 50 hectare open-cut proposal imposes adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the

natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Antony LEWIS BE, MBT

Antony LEWIS

[REDACTED]

Monday, November 13, 2017 - 19:33

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 7:03:38 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

B King

A black rectangular redaction box covering the signature area.

Monday, November 20, 2017 - 19:03



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 8:03:01 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The PAC has previously rejected open-cut coal mining in this woodland . This proposal will also destroy a valley woodland area of conservation significance and should be rejected.

Please refuse Manildra's proposed mine expansion and prevent further open-cut mining in the Gardens of Stone region.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

ben harris

A black rectangular redaction box covering the signature area.

Monday, November 20, 2017 - 20:02

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 5:56:45 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Beth King

[Redacted signature]

Friday, November 17, 2017 - 17:56

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 11:00:15 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Beverley Thompson

A black rectangular redaction box covering the signature area.

Friday, November 17, 2017 - 10:59

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 3:55:45 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Bill Harvey

[REDACTED]

Wednesday, November 15, 2017 - 15:55



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 11:25:31 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

I run one of the largest Scout Groups in NSW and the Gardens of Stone is a natural bush walking site for all those with an interest in the flora and geography of the Blue Mountains Region, especially the coming generations. Any defacing of it would be unconscionable.

I completely oppose any mining in this area.

Bob Head

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

I run one of the largest Scout Groups in NSW and the Gardens of Stone is a natural bush walking site for all those with an interest in the flora and geography of the Blue Mountains Region, especially the coming generations. Any defacing of it would be unconscionable.

I completely oppose any mining in this area.

Bob Head

Bob Head

[REDACTED]

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 8:01:01 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.  
How can you even contemplate this mine development?  
Just stop it right now. You have the power to do good, so do it.

Yours sincerely,  
Bronwyn Rees

Bronwyn Rees

A black rectangular redaction box covering the contact information of Bronwyn Rees.

Saturday, November 18, 2017 - 08:00

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 10:17:40 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Mr. Forward, without the support of environmental vigilance on the part of the government and custodians of our country, we would already be living in a black hole. The previous decisions of the PAC review must be upheld. The sustainability of our environment must be protected. We cannot continue with the constant greed for profit demanded by shareholders of corporations. I realise governments and workers are rewarded in the short term but the land is the loser and we only have one world on which we can live. Why destroy it and leave nothing for future generations?

Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Carol Henry

Carol Henry

[REDACTED]

Saturday, November 18, 2017 - 10:17

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 9:36:19 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Cathryn Hantos

[REDACTED]

Sunday, November 19, 2017 - 09:36

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 10:20:43 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Chelsea Corlett



Saturday, November 18, 2017 - 10:20

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 23 November 2017 7:25:37 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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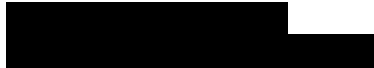
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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Cheryl Cordery

Cheryl Cordery

A black rectangular redaction box covering the contact information of Cheryl Cordery.

Thursday, November 23, 2017 - 07:25

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 8:29:43 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Chia Moan

A black rectangular redaction box covering the signature area.

Monday, November 20, 2017 - 08:29

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 10:13:05 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Chris Bolenski

[REDACTED]

Friday, November 17, 2017 - 22:12

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 6:47:40 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Chris Hudson

[REDACTED]

Wednesday, November 15, 2017 - 18:47

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 23 November 2017 9:27:56 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Christine Corner

Christine Corner



Thursday, November 23, 2017 - 09:27

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 5:53:36 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Christopher Musgrove

[REDACTED]

Friday, November 17, 2017 - 17:53

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 2:32:16 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Colin F Walters

Colin Walters

[REDACTED]

Wednesday, November 15, 2017 - 14:31

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 4:59:44 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Thank you for the opportunity to comment on this mining proposal.

I have nothing against mining however I am completely against destroying a place like The Gardens Of Stone.

Yours sincerely,

Damian Davies

Damian Davies

A black rectangular redaction box covering the signature area.

Sunday, November 19, 2017 - 16:59

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 7:59:40 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

HANDS OFF COUNTRY!!!!

Sincerely,

D.T. KIND

Danielle Kind

[REDACTED]

Saturday, November 18, 2017 - 19:59

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 9:39:56 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

David HUfton

A black rectangular redaction box covering the signature area.

Thursday, November 16, 2017 - 21:39

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 9:53:50 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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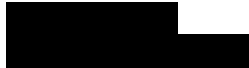
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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

David Hutchinson

David Hutchinson

A black rectangular redaction box covering the contact information of David Hutchinson.

Tuesday, November 21, 2017 - 21:53

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 2:20:29 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

David ---

A black rectangular redaction box covering the signature of David.

Wednesday, November 15, 2017 - 14:20

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 8:03:06 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Debbie Beckwith

A black rectangular redaction box covering the signature area.

Saturday, November 18, 2017 - 20:02

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 10:06:07 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,

Debbie Mitchell-davis

A black rectangular redaction box covering the signature area.

Sunday, November 19, 2017 - 10:05

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 8:47:50 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,  
Deborah Stone

Deborah Stone

A black rectangular redaction box covering the signature area.

Monday, November 20, 2017 - 08:47

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 6:29:52 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Dianne Pells

Dianne Pells

A black rectangular redaction box covering the signature area.

Tuesday, November 21, 2017 - 18:29

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 5:46:13 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

How many times do we have to keep objecting... it's obscene. Legislation has been so easy to be amended by this Government when things don't go their way in the environment court, why can't changes be made rejecting any further applications instead putting us through (the people who live here and appreciate this special place) this stressful time consuming process.

Mostly PAC seems a waste of time, it's a method to be seen to make people believe or think they are being listened too, sorry it's a farse.

I have no faith in this process, but because I care I will submit if not for me but for my grandchildren.

At least when the devastation appears in time my name won't be mentioned as one being the destructive imbecile who gave no thought or duty of care for future generations to experience .

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

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The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

This was one that PAC got it right please what has changed nothing so do the right thing again and reject it , otherwise the previous application could take umbrage, costly exercise.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Dinna Upton

[REDACTED]

Wednesday, November 15, 2017 - 05:46

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 11:15:10 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Don Thompson

Don Thompson



Saturday, November 18, 2017 - 11:15

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 7:03:25 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Elaine Trotman

[REDACTED]

Saturday, November 18, 2017 - 19:03

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 8:51:36 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,  
Libby Gahl

We have family from overseas staying in our home, each year. They are amazed and in awe of the incredible beauty of the Blue Mountains region; the rock formations, trees, animals and flowers are so unique to this area.

At the same time, the Blue Mountains is a mecca for travellers hoping to experience the lauded beauty of the eastern Australian landscape, to come and see and take away their stories of its wonder. This area is extraordinary - it needs protection and care.

Please defend the Gardens of Stone from further mining and industry.

Elisabeth Gahl

[REDACTED]

Monday, November 20, 2017 - 08:50

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 14 November 2017 5:15:36 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Eliza Allan

A black rectangular redaction box covering the contact information of Eliza Allan.

Tuesday, November 14, 2017 - 05:15

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 6:06:11 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Eloise Fisher

Eloise Fisher



Friday, November 17, 2017 - 18:06

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 4:49:51 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal. Please protect the Gardens of Stone.

Yours sincerely,  
Emily Brayshaw

Emily Brayshaw

[REDACTED]

Sunday, November 19, 2017 - 16:49

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 8:56:21 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Gardens of Stone is an incredibly beautiful place & ultimately it will a huge shame to see the landscape torn apart & replaced with coal mining. It is such a unique aspect that showcases Australia's outback beauty & is a great attractions, not only for tourists but for anyone to enjoy the area.

Yours sincerely,  
Emmalie

Emmalie Sanders

[REDACTED]

Tuesday, November 21, 2017 - 20:56

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 1:54:34 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Even though I live in the UK I fully support this petition against the despoiling of a beautiful area which should be enjoyed for generations to come. I hope greed for money doesn't prevail.

Yours sincerely

Fiona Chappell

Fiona Chappell

[REDACTED]

Wednesday, November 22, 2017 - 01:54

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 3:45:05 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose the Department's recommendation to expand the open-cut area and continue coal production for eight years. As commissioners would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes on this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodland adjoins the pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise the beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and the woodlands below them. The pagoda rock features cannot be considered in isolation from

the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has been presented that could overturn the last PAC determination. Please refuse consent for the proposed Invincible mine, modification 5, as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Fiona Sim

A black rectangular redaction box covering the contact information of Fiona Sim.

Monday, November 20, 2017 - 15:44

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 9:54:06 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07\_0127 MOD 5 (D490/17).

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The PAC has previously rejected open-cut coal mining in this woodland . This proposal will also destroy a valley woodland area of conservation significance and should be rejected.

Please refuse Manildra's proposed mine expansion and prevent further open-cut mining in the Gardens of Stone region.

The Commission may publish my name as Freda M, my location and this submission.

I live in the upper Blue Mountains and have been blessed with the opportunity of exploring and appreciating the unique Ben Bullen pagoda landscape and its protective woodlands. Please protect it for future generations.

Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Freda Moxom

Freda Moxom

A black rectangular redaction box covering the contact information of Freda Moxom.

Tuesday, November 21, 2017 - 09:53

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 7:24:12 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Gabrielle Richardson

[REDACTED]

Friday, November 17, 2017 - 19:24

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 11:02:17 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Gemma Matteson

A black rectangular redaction box covering the signature area.

Sunday, November 19, 2017 - 23:02

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 14 November 2017 10:58:05 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Geoff Mosley

A black rectangular redaction box covering the signature area.

Tuesday, November 14, 2017 - 10:57

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 4:25:39 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Geoffrey Fox

Geoffrey Fox

[REDACTED]

Sunday, November 19, 2017 - 16:25

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 10:56:26 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

The Gardens o Stone area needs to be protected and I object to the proposed modification of the Invincible coal mine. I have walked many areas around there and it is worth protecting for future generations, wildlife and biodiversity. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.



The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Gerarda mader.

Gerarda Mader

[REDACTED]

Tuesday, November 21, 2017 - 22:56

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 13 November 2017 5:30:00 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

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Grahame Edwards

[REDACTED]

Monday, November 13, 2017 - 17:29

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 8:27:41 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Grahame Coote

Grahame Coote

A black rectangular redaction box covering the signature area.

Tuesday, November 21, 2017 - 20:27

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 5:49:28 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Gregory Olive

[REDACTED]

Tuesday, November 21, 2017 - 17:49

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 12:42:53 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
H Shields

H Shields

A black rectangular redaction box covering the signature area.

Sunday, November 19, 2017 - 00:42

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 4:58:48 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I am writing to implore you to prevent the proposed modification of the Invincible coal mine.

Open-cut coal mining is an anathema in this sensitive part of the Gardens of Stone region.

In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission.

Please do the right thing and protect this exception part of our country.

Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Helene

Helene Zampetakis

[REDACTED]

Friday, November 17, 2017 - 16:58

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 8:15:50 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

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The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

We elect a government to be responsible and accountable, looking after our heritage and scenic sites. Benefits derived from tourism is eternal but coal mining is not only detrimental to the environment, it only benefits some and the resource is finite.

Yours sincerely,

Heng K Tey

[REDACTED]

Monday, November 20, 2017 - 20:15

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 6:37:04 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Honor McGregor

Honor McGregor

[REDACTED]

Tuesday, November 21, 2017 - 18:36

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 2:36:41 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Ian Baird

Ian Baird

[Redacted signature]

Thursday, November 16, 2017 - 14:36

**From:** [REDACTED] [ation](#)  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 23 November 2017 5:34:55 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
ian plant

ian plant



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 5:21:14 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Ian Starkey

A black rectangular redaction box covering the signature area.

Wednesday, November 22, 2017 - 17:21

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 7:46:09 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Isabel Robinson

Isabel Robinson

[REDACTED]

Saturday, November 18, 2017 - 07:45

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 2:56:34 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I wish to lodge my objection to the proposed modification of the Invincible coal mine.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes". Coal mining, particularly open cut, is completely at odds with conservation. That ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

The Commission must surely be aware of the intentions of this company. Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise



this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

New coal mining applications are becoming increasingly anachronistic when it is clear that the need for coal is declining rapidly. Given this situation, the permanent destruction of this unique landscape would be all the more inexcusable.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Jan O'Leary

[REDACTED]

Wednesday, November 22, 2017 - 14:56

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 11:03:47 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Janet Mayer

Janet Mayer

[REDACTED]

Tuesday, November 21, 2017 - 23:03

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 10:38:16 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Janine

Janine Nielsen

[REDACTED]

Tuesday, November 21, 2017 - 10:37

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 12:34:24 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Jason Edwards

[REDACTED]

Tuesday, November 21, 2017 - 12:32

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 12:21:07 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

New South Wales (and all of Australia) should be looking at renewable sources of energy and not the continued (or increased) dependency on coal.

Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

J Robertson

Jeanette Robertson

A black rectangular redaction box covering the signature area.

Thursday, November 16, 2017 - 12:20

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 9:38:03 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Jenne Van Antwerpen

A black rectangular redaction box covering the signature area.

Thursday, November 16, 2017 - 21:37

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 9:10:27 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Jenni Warren

Jenni Warren

[REDACTED]

Sunday, November 19, 2017 - 21:10

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 8:22:53 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

I'm writing to you regarding the Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be irresponsible to reverse the Commission's 2013 and 2014 decisions that rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for any period of time.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value and their applications should be denied.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers an area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. Please refuse consent for the proposed Invincible mine.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Jennifer Dove

Jennifer Dove



Wednesday, November 15, 2017 - 20:22

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 9:41:01 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Jeremy Gordon

[REDACTED]

Tuesday, November 21, 2017 - 21:40

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 2:15:05 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Jesse Baravykas

Jesse BARAVYKAS

A large black rectangular redaction box covering the signature area.

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 3:26:22 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape. Having bushwalked in this amazing landscape, I have had personal experience of the uniqueness of this landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

John Park

John Park

[REDACTED]

Tuesday, November 21, 2017 - 15:26

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 1:55:55 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

Please uphold the previous decisions of the PAC and refuse consent for the proposed Invincible mine, modification 5. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape. It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest.

I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368

hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
John Pettit

John Pettit

[REDACTED]

Monday, November 20, 2017 - 13:55

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 14 November 2017 6:21:36 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I do not consider it appropriate that after the previous determination a substantially similar mine proposal has been submitted. The area will have outstanding conservation values, until a single approval is approved. If there are multiple applications then the risk to the area is the sum of the applications. As such once an application has been denied this determination should apply to further applications.

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut



mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

John Robens

[REDACTED]

Tuesday, November 14, 2017 - 06:21

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 7:18:41 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object and equally oppose the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation. So why is even being put forward.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Julie Favell

A black rectangular redaction box covering the signature area.

Wednesday, November 22, 2017 - 07:18

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 12:29:33 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Julie Whittlam

Julie Whittlam



Wednesday, November 22, 2017 - 12:28

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 6:38:04 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Karin Steininger

Karin Steininger

[REDACTED]

Friday, November 17, 2017 - 18:37

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 6:17:42 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

kate Girdwood

A black rectangular redaction box covering the signature area.

Tuesday, November 21, 2017 - 18:17

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 6:25:06 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

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The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Katherine.

Katherine littlewood

[REDACTED]

Wednesday, November 22, 2017 - 18:24

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 6:43:16 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Katrina

Katrina Khoupongsy

A black rectangular redaction box covering the contact information of Katrina Khoupongsy.

Friday, November 17, 2017 - 18:43

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 6:13:20 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Katriona herborn

Katriona Herborn

[REDACTED]

Tuesday, November 21, 2017 - 18:13

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 9:57:58 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Kelly Ost

A black rectangular redaction box covering the signature of Kelly Ost.

Monday, November 20, 2017 - 09:57

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 11:55:30 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

In an era where the world is rapidly migrating to renewable energy production and storage in an attempt to avoid catastrophic climate change the approval of new or expanded coal mines is morally and ethically perverse in the extreme. Apart from damage & potential damage in and near the mine area adding more carbon into an already overloaded environment is madness. It will contribute to our Pacific & Indian Ocean neighbours literally disappearing under the waves, mass forced migration of billions of people, destruction of agricultural land through drought and flood accompanied by global food and freshwater shortages. An increase in numbers and area tropical diseases, more deaths from heat in the world's most populous areas and \$10s of trillion in infrastructure damage globally will also occur. Due to our geographic location Australia will be among the worst affected.

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Ken Dally

[REDACTED]

Monday, November 20, 2017 - 11:55

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 10:07:28 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,

Ken Foster

Ken Foster

A black rectangular redaction box covering the contact information of Ken Foster.

Tuesday, November 21, 2017 - 22:07

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 10:30:50 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Kerrie Pierce

Kerrie Pierce

[REDACTED]

Monday, November 20, 2017 - 10:30

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 13 November 2017 7:59:55 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,  
Ms Kim Mckay

Kim Mckay

[REDACTED]

Monday, November 13, 2017 - 19:59

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 4:21:28 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

Whilst I concede this is a form letter, reading through it, I could not word it any better myself. I therefore request you accept this as an individual submission.

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Lachlan Garland

[REDACTED]

Thursday, November 16, 2017 - 16:20

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 9:13:16 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Lawrence Tynan Curran

[REDACTED]

Sunday, November 19, 2017 - 21:13

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 11:12:14 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Leanne Jones

A black rectangular redaction box covering the signature area.

Sunday, November 19, 2017 - 11:12

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 6:19:11 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Lionel Brett Broadbere

[REDACTED]

Wednesday, November 22, 2017 - 06:19

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 9:10:31 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Lynette Cox

A black rectangular redaction box covering the contact information of Lynette Cox.

Tuesday, November 21, 2017 - 21:10

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 3:08:52 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Lynne Chillemi.

Lynne Chillemi

[REDACTED]

Thursday, November 16, 2017 - 15:08

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 9:45:55 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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This area is too magnificent to carelessly destroy for short term profit .The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Maranne Sear

A black rectangular redaction box covering the signature area.

Thursday, November 16, 2017 - 21:45

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 5:17:27 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Maria Lang

[REDACTED]

Wednesday, November 15, 2017 - 17:17

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 2:36:08 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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It is really distressing that this company cannot take the previous PAC ruling seriously and still wants to over ride previous decisions. when will they realise this is land which should be conserved?

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Marie Morris

Marie Morris

[REDACTED]

Wednesday, November 15, 2017 - 14:35

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 9:01:18 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The timing is wrong with overwhelming objection to further pollution by fossil fuels, the overwhelming objection of big successful corporations like Manildra that refuse to respect the environment & conserve its unique & finite attributes, in this case The Gardens of Stone, I believe there should be mature guidance by our protective ( supposedly) agencies to deter any negative impacts to such exceptional landscapes to preserve what is and will be what is of value now & for future generations. Rather than merely supporting the short term greed that does & will do little to sustain us in the long term. Instead we will be left with denuded & barren landscapes robbed of significant groundwater that maintains all ecological communities Time to change attitudes & act before it is too late Manildra has done a deal with the government, something of which we are well aware & this must not sway the ultimate decision.

Yours sincerely,  
Mary Thirlwall

Mary Thirlwall



Wednesday, November 15, 2017 - 21:00

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 6:17:21 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matt Bradshaw

A black rectangular redaction box covering the signature area.

Friday, November 17, 2017 - 18:17

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 8:35:14 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Open cut coal mining will destroy the landscape on a far greater scale than the footprint of the mine itself.  
The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matthew Bell

A black rectangular redaction box covering the contact information of Matthew Bell.

Saturday, November 18, 2017 - 20:35

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 6:42:17 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matthew Cafe

[Redacted signature]

Thursday, November 16, 2017 - 18:42

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 10:44:12 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matthew Minnett

[REDACTED]

Friday, November 17, 2017 - 22:44

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 12:58:38 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matthew Myles

[REDACTED]

Tuesday, November 21, 2017 - 12:57

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 6:01:37 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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6The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Maxine McKinley

A black rectangular redaction box covering the signature area.

Thursday, November 16, 2017 - 06:00

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 11:12:34 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Meg Thompson

A black rectangular redaction box covering the signature area.

Saturday, November 18, 2017 - 11:12

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 11:52:37 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,  
Merryn Campbell

Merryn Campbell

[REDACTED]

Wednesday, November 22, 2017 - 11:52

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 1:38:01 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Dear Paul,

As a frequent walker in this area and a lover of nature I recommend that this area of outstanding natural beauty be saved for future generations to enjoy. It cannot ever be properly restored to its original unique nature.

Yours sincerely,

Michael Holt

Michael Holt

[Redacted signature block]

Tuesday, November 21, 2017 - 13:37

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 11:12:04 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

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Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

If there are to be public hearings I would like to register to speak, amplify on this submission and present new material

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Michael Keats OAM

Michael Keats

[REDACTED]

Tuesday, November 21, 2017 - 11:07

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 12:39:39 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Michael Macdonald

[REDACTED]

Tuesday, November 21, 2017 - 10:41

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 8:25:53 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Michael Shea

Michael Shea

A black rectangular redaction box covering the contact information of Michael Shea.

Friday, November 17, 2017 - 08:25

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 8:16:21 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Michelle Jonkers

[REDACTED]

Sunday, November 19, 2017 - 20:16

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 7:55:53 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Mike Stacey

[REDACTED]

Sunday, November 19, 2017 - 07:55

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 5:40:42 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

The Gardens of Stone region must be protected. As such, I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Narelle Jarvis

Narelle Jarvis

[REDACTED]

Wednesday, November 22, 2017 - 17:40

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 8:09:28 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Nasus Selams

A black rectangular redaction box covering the signature area.

Saturday, November 18, 2017 - 08:09

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 10:51:32 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Neil Stevenson

Neil Stevenson

[REDACTED]

Wednesday, November 22, 2017 - 10:51

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 10:55:10 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Nicholas Hood

Nick Hood

A black rectangular redaction box covering the contact information of the sender.

Monday, November 20, 2017 - 10:54

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 3:02:13 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Nicolas Rasmussen

A black rectangular redaction box covering the signature area.

Wednesday, November 22, 2017 - 15:01

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 7:36:33 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

I ask each member of the commission to consider the legacy you will leave your grandchildren and their descendants. Will it be the pristine Gardens of Stone or large areas of holes in the ground and museums of what it used to look like. They may ask why did they destroy it.

Please consider carefully.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Noel Rath

Noel Rath  


Tuesday, November 21, 2017 - 07:36

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 10:26:18 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I most strongly object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation. I have heard no convincing argument as to why the Department believes conservation is no longer the highest and best use of this priceless area.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Norman Sage

[Redacted signature]

Wednesday, November 22, 2017 - 10:26

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 6:38:22 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

I have visited the area where the proposed mine is planned for and the area offers many different experiences to what is offered elsewhere in the Blue Mountains. The pagodas are unique to the area and are the result of leaching of minerals from the basalt which covered the area millions of years ago into the sandstone. Erosion of the sandstone has produced rock formations not found elsewhere in the Blue Mountains. The pagodas warrant World Heritage Protection which other parts of the Blue Mountains have in place.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Paul McCann

[REDACTED]

Paul McCann

[REDACTED]

Sunday, November 19, 2017 - 18:37

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 7:15:13 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Pawel Hanasz, [REDACTED]

Pawel Hanasz  
[REDACTED]

Monday, November 20, 2017 - 19:15

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 7:04:39 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

After having taken more than one premier or environment minister to this area decades ago and having been given assurances that the area was to be protected it is very frustrating to know that the government is still considering to collaborate in its destruction. I implore you to uphold previous decisions to protect the area.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Peter Maslen

[REDACTED]

Thursday, November 16, 2017 - 19:04

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 13 November 2017 8:35:37 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Peter Morris

A black rectangular redaction box covering the contact information of Peter Morris.

Monday, November 13, 2017 - 20:34

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 3:15:51 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Phillip Arundell

A black rectangular redaction box covering the signature area.

Sunday, November 19, 2017 - 15:15

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 5:58:59 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the project approval for the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes". I agree. The recommendation by the Department of Planning and Environment (the Department) is not consistent with that ruling, and the Department's recommendation should be rejected.

The Commission should adhere to its 2013 and 2014 decisions that rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose the Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment should be opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal adversely affects the only area where grassy tableland woodlands adjoin pagodas. This woodland area is an integral part of the pagoda landscape and its loss will severely compromise the beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed

in 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets (and payments) are irrelevant to conservation of this unique pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5, as neither the applicant nor the Department has provided any basis to overturn the past decisions regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely

Phillip Cornwell

[REDACTED]

Tuesday, November 21, 2017 - 17:58

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 7:06:22 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

This proposal has a very short mine life and is extremely disproportionate to the long lasting environmental damage it will cause. Manildra could draw on reserves around the Wollongong region for it's south coast operations. Apart from these immediate concerns consider the fact that Manildra must some time in the next 8 - 10 years address alternative energy sources apart from coal. Compelling time frames would surely consign this project to the ' uneconomic basket' of national priorities. The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely, Phil Niciak

Phillip NICIAK

[REDACTED]

Wednesday, November 22, 2017 - 19:06

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 11:07:58 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Prudence Sky

Prudence Sky

[REDACTED]  
[REDACTED]  
[REDACTED]:07

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 2:28:01 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I very strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed in 2014 that the pagoda landscape consists of the pagodas and woodlands below



them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Please refuse Manildra's proposed mine expansion and prevent further open-cut mining in the Gardens of Stone region as this proposal will destroy a valley woodland area of conservation significance and should therefore be rejected. We need to protect our pristine unique environmental areas for the generations to come. Please don't let them down.

The Commission may publish my name, location and this submission.  
Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Richard Madigan

Richard Madigan



Wednesday, November 22, 2017 - 14:27

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 11:10:57 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

Dear Mr Forward,

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC and refuse Manildra's proposed mine expansion and prevent further open-cut mining in the Gardens of

Stone region.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Rima D'Arcy

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Rima D'Arcy

[REDACTED]

Thursday, November 16, 2017 - 11:10

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 3:21:23 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Rob Jones

[REDACTED]

Wednesday, November 22, 2017 - 03:21

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 6:01:29 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Robert Tilley

[REDACTED]

Tuesday, November 21, 2017 - 18:00



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 10:05:34 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Further, I would like to add my personal view that coal-fired power is a phenomenon of the past and, even if narrow economic considerations were to be the sole criterion for assessment of this proposal, the long-term gains to be achieved from retaining the area in its current state and using it for ecotourism will far outweigh the short-term gains to be obtained by a wrong-headed act of ecological vandalism.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Rowan Holmes

[REDACTED]

Friday, November 17, 2017 - 22:05

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 7:33:23 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Ruby Stephens

Ruby Stephens



Saturday, November 18, 2017 - 07:33

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 1:46:50 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

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Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

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The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Samantha Howe

[REDACTED]

Saturday, November 18, 2017 - 13:46

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 4:38:21 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Please do the right thing, and admit that the continued promotion of fossil fuel mining is an industry that the rest of the world is trying to phase out.

Australia should be leaders in phasing it out because we have much scope for renewable resources which will also promote employment and not damage the environment or human health.

Thank you for your consideration  
Sandra Shergill

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Sandra Shergill

A black rectangular redaction box covering the signature area.

Saturday, November 18, 2017 - 16:38



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 7:03:26 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,  
Sarah Daniel

Sarah Daniel

[REDACTED]

Wednesday, November 22, 2017 - 19:03

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 1:33:29 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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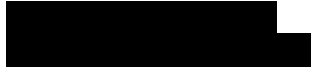
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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Natural stone features and the protected landscapes they shelter can not easily be replicated if they are destroyed. This sort of environmental damage would be a loss of important heritage values.

Yours sincerely,  
Sarah Gunn

Sarah Gunn

A black rectangular redaction box covering the signature area.

Thursday, November 16, 2017 - 01:33

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 5:23:04 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Sean Corrigan

[REDACTED]

Tuesday, November 21, 2017 - 17:22

**From:** [REDACTED] [ndation](#)  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 12:23:30 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Sheila zaman

Sheila Zaman

[REDACTED]

Tuesday, November 21, 2017 - 12:22



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 12:24:19 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Simon Alexander

[REDACTED]

Sunday, November 19, 2017 - 12:24

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Thursday, 16 November 2017 7:18:37 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Simon Grover

A black rectangular redaction box covering the contact information of Simon Grover.

Thursday, November 16, 2017 - 19:18

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 4:34:30 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,

Stephanie

Stephanie Rowley

[REDACTED]

Tuesday, November 21, 2017 - 16:34

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 1:02:43 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Yours sincerely,

Sue Daley

Sue Daley

A black rectangular redaction box covering the contact information of Sue Daley.

Tuesday, November 21, 2017 - 13:02



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 3:04:05 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission.

This unique environment and heritage must be better protected.

Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Susan Ambler

[REDACTED]

Wednesday, November 15, 2017 - 15:03

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 8:37:14 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Tam Hanson

[REDACTED]

Saturday, November 18, 2017 - 08:37

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 1:06:17 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may NOT publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Tania Kayrala

A black rectangular redaction box covering the signature area.

Tuesday, November 21, 2017 - 13:05

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 10:07:17 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The PAC has previously rejected open-cut coal mining in this woodland . This proposal will also destroy a valley woodland area of conservation significance and should be rejected.

Please refuse Manildra's proposed mine expansion and prevent further open-cut mining in the Gardens of Stone region.

The Commission may publish my name, location and this submission.

Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Thais Turner

Thais Turner  


Monday, November 20, 2017 - 22:06



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Sunday, 19 November 2017 9:18:04 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

This is one of the world most amazing places to explore and visit, and needs to be saved for future generations, I often take my children out there, for hikes, and camping..

Yours sincerely,  
Tim Griffiths

Tim Griffiths

[REDACTED]

Sunday, November 19, 2017 - 09:17

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 13 November 2017 7:54:10 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

One has to ask how many time we the public have to write submissions to protect this important area that has international world heritage values it is not just the Australian public but the world is now watching what will happen here!

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The State and Federal Governments need to protect the special area for international values it contains.

Thank you for the opportunity to comment

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Timothy Bidder

[REDACTED]

Monday, November 13, 2017 - 19:53

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 15 November 2017 7:43:10 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Tommy Wiedmann

[REDACTED]

Wednesday, November 15, 2017 - 19:42

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 8:35:51 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Tor Land

A black rectangular redaction box covering the signature of the sender.

Tuesday, November 21, 2017 - 20:35



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 11:38:51 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

PLEASE READ MY COMMENT ABOUT - YOUR CHILDREN -- FOLLOWING BELOW.

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

MR FORWARD, I AM APPALLED THAT YOU ARE EVEN CONTEMPLATING YOUR PLAN.

YOUR CHILDREN - AND THEIR CHILDREN WILL NEVER FORGIVE YOU!

Yours sincerely,

Trevor Giblin

Trevor Giblin

[REDACTED]

Tuesday, November 21, 2017 - 11:38

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 10:42:18 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

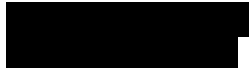
Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Vanessa Macedo

Vanessa Macedo

A black rectangular redaction box covering the signature area.

Friday, November 17, 2017 - 22:42

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Wednesday, 22 November 2017 5:26:29 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

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them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Vicki Harriss

A black rectangular redaction box covering the signature area.

Wednesday, November 22, 2017 - 17:26

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 6:58:59 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal. All mining must be stopped, we cannot put our water and farmland at risk. Our government is extremely short sighted and only interested in making money.

Yours sincerely,

Vicki Jenkins

A black rectangular redaction box covering the contact information of Vicki Jenkins.

Friday, November 17, 2017 - 18:58



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 9:22:05 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Wayne Barrott

[REDACTED]

Tuesday, November 21, 2017 - 21:21

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Monday, 20 November 2017 10:52:41 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Will Whitfeld

Will Whitfeld

[REDACTED]

Monday, November 20, 2017 - 10:52

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 9:13:15 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Xanthe Alton-Edwards

A black rectangular redaction box covering the contact information of Xanthe Alton-Edwards.

Saturday, November 18, 2017 - 21:12

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Saturday, 18 November 2017 2:00:20 PM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

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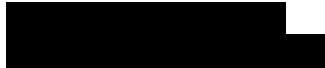
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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Yasmin Hannouf

A black rectangular redaction box covering the contact information of the sender.

Saturday, November 18, 2017 - 13:59



**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Friday, 17 November 2017 7:00:53 AM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining is not appropriate in the unique pagoda landscape of the Gardens of Stone region and must not be allowed to recommence.

In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

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The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Yuri Bolotin

[REDACTED]

Friday, November 17, 2017 - 07:00

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 21 November 2017 2:56:33 PM

---

Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

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Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below

them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Yvonne and Richard Lollback

[REDACTED]

Tuesday, November 21, 2017 - 14:56

**From:** [REDACTED]  
**To:** [PAC Enquiries Mailbox](#)  
**Subject:** Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07\_0127 Mod 5 (D490/17)  
**Date:** Tuesday, 14 November 2017 10:24:25 AM

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Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07\_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra's 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

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Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Zelda Graham

[REDACTED]

Tuesday, November 14, 2017 - 10:23