

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Invincible Mine Objection
Date: Wednesday, 6 December 2017 7:31:30 AM

Dear Mr Forward

The Gardens of Stone area, near Lithgow, is an incredible landscape that has been in the making for 250 million years. Home to fragile pagoda rock formations, ancient Aboriginal culture and rare and threatened plants and animals, this area has been recognised for its international geological significance and fragile eco-systems.

I object to the proposed extension of the Invincible Coal mine, now owned by the Manildra Group (Castlereagh Coal). The extension is located within the former Coalpac expansion projects which were rejected by two independent Planning Assessment Commissions (PACs) in 2013 and 2014. I strongly object to open-cut mining being approved in this sensitive part of the Gardens of Stone when the 2014 Commission concluded that "the highest and best use of the area is for conservation purposes". The Commission should uphold its previous decisions.

I object to the Invincible Extension Project (IEP) for the reasons set out below, in summary:

- The IEP ignores the importance of the pagoda land system and only refers to the pagodas. This serious omission demonstrates no understanding of the conservation values of the western part of Ben Bullen State Forest, as recognised by two PACs, Department of Planning and the Office of Environment.
- Both PACs recognised the area was part of the unique pagoda land system comprising the pagodas and cliffs, steep slopes and woodlands. The IEP is part of the woodlands adjoining the pagodas - an integral part of the pagoda land system that supports the plants and animals
- The IEP would allow destructive open cut mining in part of the Gardens of Stone region. Twice the independent Planning Assessment Commission (PAC) has comprehensively rejected open cut mining for parts of this region, including the IEP land, finding that the area should have "the highest level of protection".
- Once open cut mined, the land and its plants and animals are gone. The land cannot restore to its former values and it cannot be rehabilitated
- Approval of the IEP will lead to applications for more open-cut mining in the pagoda land system. Shoalhaven Coal, another company associated with the Manildra group, was granted two new exploration licences around the mine in 2016 (Exploration Licences 8168 and 8169) covering 1368 hectares.
- The IEP would have a big permanent impact for a small amount of nut coal, the primary objective for the modification.
- The IEP would add ugly open cut mining right beside the Castlereagh highway which is the main road to Gardens of Stone area and the tourism destination of Mudgee area. This will make a particularly uninviting impression on tourists to the area.
- DPE's recommendation to approve the IEP will endanger eight threatened species including allowing mining of the habitat for the Squirrel glider and the broad-headed snake.

We call on the Planning and Assessment Commission to recognise the high conservation values of the Gardens of Stone area and reject the Invincible Extension Project.

Yours Sincerely

Jane Dinsdale
[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: Thursday, 7 December 2017 8:26:35 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,

Marcus Bosisto

[REDACTED]

Thursday, December 7, 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: Thursday, 7 December 2017 7:57:23 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,

Claudia Terstappen

[REDACTED]

Thursday, December 7, 2017 - 07:57

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, 7 December 2017 7:45:26 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,

Selina Gibson

Selina Gibson

A black rectangular redaction box covering the contact information of Selina Gibson.

Thursday, December 7, 2017 - 07:44

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: Thursday, 7 December 2017 7:21:04 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.

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,

Georgia Gleeson

A black rectangular redaction box covering the contact information of Georgia Gleeson.

Thursday, December 7, 2017 - 07:20

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, 7 December 2017 6:09:02 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,

John Mackay

John Mackay

[Redacted signature]

Thursday, December 7, 2017 - 06:08

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, 7 December 2017 5:43:44 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,

charles mort

A black rectangular redaction box covering the signature area.

Thursday, December 7, 2017 - 05:43

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: Thursday, 7 December 2017 2:08:05 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,

Elise Henne

[REDACTED]

Thursday, December 7, 2017 - 02:07

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, 6 December 2017 11:58:39 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 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,

Jennie Lloyd

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 23:58

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, 6 December 2017 11:58:00 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,

Pat Wheeldon

[REDACTED]

Wednesday, December 6, 2017 - 23:57

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: Wednesday, 6 December 2017 11:38:15 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)

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,

Matthew Hitch

Matthew Hitch

[REDACTED]

Wednesday, December 6, 2017 - 23:38

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, 6 December 2017 11:27:38 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,

Rachael Nasplezes

[REDACTED]

Wednesday, December 6, 2017 - 23:27

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: Wednesday, 6 December 2017 11:25:51 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)

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,

James Couston

James Couston


Wednesday, December 6, 2017 - 23:25

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: Wednesday, 6 December 2017 11:24:50 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.

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,

Janene Theol

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 23:24

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: Wednesday, 6 December 2017 10:47:40 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)

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 look forward to your response.
Please notify me what action will be taken to handle?

Yours Sincerely,
Paul Vonwiller

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

Yours sincerely,
Paul Vonwiller

Paul Vonwiller



Wednesday, December 6, 2017 - 22:47

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: Wednesday, 6 December 2017 10:43:26 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)

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. When will this destruction of our beautiful country stop? This is regressive and economically unviable. You must cease pandering to the interests of a minority and consider the long-term ramifications of coal usage. Environmentally speaking this proposal is vandalism of unimaginable stupidity, economically speaking the whole world is moving away from coal use and there is no market for this product and politically this move will be suicide for any government who condones it. Thank you for the opportunity to comment on this submission.

Yours sincerely,
Tiffany Paterson.

Tiff Paterson

[REDACTED]

Wednesday, December 6, 2017 - 22:43

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: Wednesday, 6 December 2017 10:23:46 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,

Virginia Mutchell

Virginia Mitchell

[REDACTED]

Wednesday, December 6, 2017 - 22:23

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, 6 December 2017 10:20:54 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,

Astra Jerebine

[Redacted signature]

Wednesday, December 6, 2017 - 22:20

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: Wednesday, 6 December 2017 10:05:28 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)

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 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. 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.

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

Yours sincerely,

Julie Bishop

[REDACTED]

Wednesday, December 6, 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: Wednesday, 6 December 2017 9:33:25 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.

This is another disgusting assault on our land and our planet. We are past peak oil. We can be 100% renewable and lead the world but our governments are too stupid. That is why my children do not vote and one has left Australia for good. HECS debts and stupid policies. They can't get work here. One daughter has a mental illness and is homeless. YES we have over 100,000 homeless people in this country - 1/4 being Aboriginal Australians. SHAME. I am ashamed to be Australian even though my family were refugees. Now I am ashamed of how this Government treats our most vulnerable people and this land. It is truly shameful. LISTEN to the people. LISTEN to us. LISTEN to Aboriginal Australians and refugees. LISTEN to unemployed, homeless and people with mental health issues. LISTEN!

Yours sincerely,

Michele Margolis

[REDACTED]

Wednesday, December 6, 2017 - 21:33

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: Wednesday, 6 December 2017 9:15:21 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.

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,

Francesca Hanlon

Francesca Hanlon

[REDACTED]

Wednesday, December 6, 2017 - 21:15

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: Wednesday, 6 December 2017 9:08:24 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
- 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,
Simon Reece

Simon Reece

[Redacted signature]

Wednesday, December 6, 2017 - 21:08

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: Wednesday, 6 December 2017 8:54:39 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 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,

Monika Boros

[REDACTED]

Wednesday, December 6, 2017 - 20:54

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, 6 December 2017 8:54:37 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)

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.

Considering the rest of the world is closing its coal mines in favour of transitioning to 100% renewable energy technology, it is absurd for us to be opening new coal mines, especially in such sensitive area as this.

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 short term gain for a few greedy people is not worth the long term damage this will bring about.

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

Yours sincerely, Ian Rose

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.

Considering the rest of the world is closing it's coal mines in favour of transitioning to 100% renewable energy technology, it is absurd for us to be opening new coal mines, especially in such sensitive area as this.

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 short term gain for a few greedy people is not worth the long term damage this will bring about.

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

Yours sincerely, Ian Rose

Ian Rose



Wednesday, December 6, 2017 - 20:54

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, 6 December 2017 8:41:27 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)

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,

Jennifer Gill

[REDACTED]

Wednesday, December 6, 2017 - 20:41

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: Wednesday, 6 December 2017 8:35:47 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,

Ariane Brose

Ariane Brose

A black rectangular redaction box covering the contact information of Ariane Brose.

Wednesday, December 6, 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: Wednesday, 6 December 2017 8:33:46 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,

Marion Meier

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 20:33

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: Wednesday, 6 December 2017 8:26:10 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)

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,

Geoff Capper

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 20:26

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: Wednesday, 6 December 2017 8:18:57 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,

Brian Mckeown

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 20:18

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, 6 December 2017 8:15:01 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,
Liz Childs

Liz Childs



Wednesday, December 6, 2017 - 20:14

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: Wednesday, 6 December 2017 8:10:01 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,

Lenka Uvirova

Lenka Uvirova

A large black rectangular redaction box covering the contact information of Lenka Uvirova.

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, 6 December 2017 8:03:51 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)

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,

Chris Kulper

[REDACTED]

Wednesday, December 6, 2017 - 20:03

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: Wednesday, 6 December 2017 7:09:26 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)

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,
Lesley Orchiston

Lesley Orchiston

[REDACTED]

Wednesday, December 6, 2017 - 19:09

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, 6 December 2017 6:44:34 PM

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

Dear Mr Forward,

My Submission opposing the Department of Planning's recommendation - Re: Invincible Extension Project 07_0127 MOD 5 (D490/17)

As the PAC has previously rejected open-cut coal mining in this woodland, I am at a loss to understand any recommendation to approve the proposed modification of the Invincible coal mine.

As a consequence I am strongly opposed to any extension to open-cut coal mining in this sensitive curtilage of the Gardens of Stone region. It was as recent as October 2014 that the Commission, in its wisdom, determined that the "highest and best use of the area is for conservation purposes" and that ruling should, I believe, be strongly adhered to.

Thus, it would be inappropriate to rescind the 2013 and 2014 decisions, of the Commission, that had previously rejected applications for open-cut mining in this 50 ha area, together with other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and the proposal to continue coal mining for eight years. The Commissioners' would, doubtless, appreciate approval of this modification is likely to lead to further 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.

Furthermore, Manildra 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. And, when the modification is read in this context it appears that it is not a different proposal to the proposals previously rejected for this mine site.

It appears that 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.

Any approval of Manildra's 50 hectare open-cut proposal will likely impose adverse environmental outcomes upon this outstanding natural area. Thus, the real cost of damage to the natural environment could never be compensated for, by offsets, contrary to the assertions made by the Department.

Moreover, 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 adjoins pagodas. Clearly, this woodland is an integral part of this pagoda landscape and its

loss will compromise this beautiful pagoda landscape.

The PAC correctly determined in 2012 and confirmed again 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. And, the buffer debate was part of the previous PAC review and determination that refused consent.

Further, all would be aware that ecosystems can never be replanted after open-cut mining. And, the proposed biodiversity offsets could never replace the unique Ben Bullen pagoda landscape. The proposed offsets are meaningless in terms of the conservation of the pagoda landscape.

I strongly believe that the previous determinations of the PAC should be adhered to. There has not been any new compelling reason(s) advanced nor new evidence such as Departmental analysis provided supporting grounds that could reverse the earlier PAC determination.

In conclusion, I urge the Department to refuse consent for the proposed Invincible mine, modification 5, as the applicant and Department of Planning and Environment have not provided any new reason(s) to reverse the standing, earlier, judicious decision in this matter.

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

Yours sincerely,

John Boyle

[REDACTED]

Wednesday, December 6, 2017 - 18:44

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: Wednesday, 6 December 2017 6:16:44 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,

Robert Boekel

[REDACTED]

Wednesday, December 6, 2017 - 18:16

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: Wednesday, 6 December 2017 6:15:10 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)
I can't understand that it's even a proposal....
An area as beautiful as this....!
To me it's truly a crime . Such beauty ought to be preserved at all costs.

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,
Michele Alberth

Michele Alberth



Wednesday, December 6, 2017 - 18:14

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: Wednesday, 6 December 2017 5:59:24 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 - 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,

Rachel Hannan

[Redacted signature]

Wednesday, December 6, 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, 6 December 2017 5:40:33 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)

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,

Jamieson Best

A black rectangular redaction box covering the contact information of the sender.

Wednesday, December 6, 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: Wednesday, 6 December 2017 5:31:25 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,

Scott Hartvigsen

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 17:31

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: Wednesday, 6 December 2017 5:22:43 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,

Stephen Curtain

A black rectangular redaction box covering the contact information of Stephen Curtain.

Wednesday, December 6, 2017 - 17:22

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: Wednesday, 6 December 2017 4:59:11 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)

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 mine could invest in wind and power, retrain their mining workforce which could include tourism by closing the mine and provide tours of old technology. Please think about the future and what it should look like.

Thanks for your time if you got to the last paragraph,

Narelle.

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

Yours sincerely,

Narelle Wilson

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 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: Wednesday, 6 December 2017 4:56:41 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.

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

Yours sincerely,

Alex Delaney

Alex Delaney

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 16:56

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, 6 December 2017 4:53:18 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)

I 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.

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 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. I sincerely hope that it will be prevented from going ahead.

Yours sincerely,
Brigid Dowsett

Brigid Dowsett



Wednesday, December 6, 2017 - 16:52

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: Wednesday, 6 December 2017 4:45:00 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,

Rosie Wood

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 16:44

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: Wednesday, 6 December 2017 4:34:15 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)

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
Kay Callaghan

Kay Callaghan

A black rectangular redaction box covering the contact information of Kay Callaghan.

Wednesday, December 6, 2017 - 16:33

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: Wednesday, 6 December 2017 4:29:02 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,

Jazzlyn

Jazzlyn Breen

[REDACTED]

Wednesday, December 6, 2017 - 16:28

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: Wednesday, 6 December 2017 4:23:50 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.

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,

Macey Starr

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 16:23

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, 6 December 2017 4:23:41 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.

I have visited this area on a number of occasions, and am always struck by its natural beauty and the aesthetics of this landscape. The vital importance of properly natural buffer zones and the inadequacy of any planted replacement are prime considerations in conserving the values of this area. Any further mine expansion would destroy the quiet and beauty of this fabulous place and I am entirely opposed to more mining here.

Yours sincerely,
Georgina San Roque

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

Yours sincerely,
Georgina San Roque

Georgina San Roque

[REDACTED]

Wednesday, December 6, 2017 - 16:22

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: Wednesday, 6 December 2017 3:26:43 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,
Ian Tanner Colong Foundation for Wilderness Limited non exec director

Ian Tanner

A large black rectangular redaction box covering the contact information of Ian Tanner.

Wednesday, December 6, 2017 - 15:25

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: Wednesday, 6 December 2017 3:22:33 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)

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,

Maranne Sear

This place must be preserved for our grandchildren

Maranne Sear

[REDACTED]

Wednesday, December 6, 2017 - 15:22

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: Wednesday, 6 December 2017 3:22:01 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,

Ewan Caldwell

[REDACTED]

Wednesday, December 6, 2017 - 15:21

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, 6 December 2017 3:17:03 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,

Sharyn Lunn

Sharyn Lunn

[Redacted signature]

Wednesday, December 6, 2017 - 15:16

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: Wednesday, 6 December 2017 3:15:01 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,
Andrena Grayling

Andrena Grayling

A black rectangular redaction box covering the contact information of the sender.

Wednesday, December 6, 2017 - 15:14

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: Wednesday, 6 December 2017 3:11:57 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.

These landscapes and ecosystems cannot be replacedthey are something to be preserved for our children and their children . Extending a coal mine lease at a time when the world should be moving away from fossil fuel use to renewables is a really bad idea and cannot be justified !

Yours sincerely,
Liz Nurthen

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

Elizabeth Nurthen

[REDACTED]

Wednesday, December 6, 2017 - 15:11

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, 6 December 2017 3:10:26 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)

I am bewildered that any serious body would still consider extending ANY existing coal mines, or approving new ones. The evidence is overwhelming that the demand for coal is in decline, the age of coal is finished. Apart from the obvious environmental damage and destruction caused by mining, the pollution and health effects on people, the impact of climate change, or global warming is obvious and undeniable. For the sake of our children and grandchildren we must not approve any extension to any coal mine.

I specifically write this to 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,

Warren Birkinshaw

[REDACTED]

Wednesday, December 6, 2017 - 15:09

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, 6 December 2017 2:39:05 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 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,

Jenifer Nicholas

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 14:38

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, 6 December 2017 2:39:03 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,

Jenifer Nicholas

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 14:38

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, 6 December 2017 2:33:10 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)

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,

Ryde Hunters Hill Flora and Fauna Preservation Society

[REDACTED]

Wednesday, December 6, 2017 - 14:32

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: Wednesday, 6 December 2017 2:25:06 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.

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,

Bridget Caldwell

A black rectangular redaction box covering the contact information of the sender.

Wednesday, December 6, 2017 - 14:24

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: Wednesday, 6 December 2017 2:22:32 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,
Leo Tregret

Leo Tregret

[REDACTED]

Wednesday, December 6, 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: Wednesday, 6 December 2017 2:15:06 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.

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,

Kareann Lindenberg

Kareann Lindenberg

[REDACTED]

Wednesday, December 6, 2017 - 14:14

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: Wednesday, 6 December 2017 2:14:52 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,

Harrison Lloyd

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 14:13

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, 6 December 2017 2:01:48 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 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,

Bridget Harilaou

Bridget Harilaou

[REDACTED]

Wednesday, December 6, 2017 - 14:01

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: Wednesday, 6 December 2017 2:00:11 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)

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,

Gwendal Guery

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 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: Wednesday, 6 December 2017 1:59:36 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,

Nancy Ainsworth

[REDACTED]

Wednesday, December 6, 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: Wednesday, 6 December 2017 1:59:19 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)

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,

Benjamin Hammond

[REDACTED]

Wednesday, December 6, 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: Wednesday, 6 December 2017 1:57:11 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)

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 read each word before adding my name to this submission. The open-cut coal mine is not justified, as the previous PAC decision already determined.

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

Yours sincerely,

Chris Bilsland

[Redacted signature]

Wednesday, December 6, 2017 - 13:57

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: Wednesday, 6 December 2017 1:55:52 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 passionately object to the proposed modification of the Invincible coal mine. There should be NO open-cut coal mining in this or any other 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 such a wrong to the people of the area, present and future, to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, and or in ANY area of public forest. I cannot tell you how strongly I oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. NO! And no to any incremental mine creep!

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.

As the price of coal tumbles, the economic arguments in favour of this proposal fall over. This is especially so if you take the environmental outcomes into account. These will affect my children and their children into the future - 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. Please take the time to look at any of Gary Hayes' amazing aerial photography of the area and you will see at once how precious and irreplaceable it is.

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. The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them.
STOP IT NOW PLEASE!

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,
Claire Hooker

Claire Hooker

[REDACTED]

Wednesday, December 6, 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: Wednesday, 6 December 2017 1:55:08 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 strongly 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.

We are so fortunate in Australia to still have pockets of wild areas, unlike in most places in the world. These should be treasured and protected AS A PRIORITY, as a precious natural resource to be protected at all costs. Once gone, they are gone forever.

Thank you for the opportunity to comment on this proposal and please listen to the people.

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

Yours sincerely,

Susan Hutchins

Sue Hutchins


Wednesday, December 6, 2017 - 13:54

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, 6 December 2017 1:48:23 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,

Patrícia Blemith

[REDACTED]

Wednesday, December 6, 2017 - 13:47

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: Wednesday, 6 December 2017 1:40:55 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)

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,
Ida

Ida Jaros

[REDACTED]

Wednesday, December 6, 2017 - 13:40

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: Wednesday, 6 December 2017 1:40:32 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,

Elizabeth Grace & Vic Val

Elizabeth Grace

[REDACTED]

Wednesday, December 6, 2017 - 13:40

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: Wednesday, 6 December 2017 1:39:57 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,

Gabrielle Richardson

Gabrielle Richardson

A black rectangular redaction box covering the signature of Gabrielle Richardson.

Wednesday, December 6, 2017 - 13:39

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: Wednesday, 6 December 2017 1:39:45 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 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,

Cathy Merchant

[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: Wednesday, 6 December 2017 1:34:42 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)

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,
Winnie Fu

Winnie Fu

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 13:34

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: Wednesday, 6 December 2017 1:33:23 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,

Anthony Cahill

[Redacted signature]

Wednesday, December 6, 2017 - 13:32

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: Wednesday, 6 December 2017 1:28:09 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,

Diah Hendarwan

[REDACTED]

Wednesday, December 6, 2017 - 13:27

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: Wednesday, 6 December 2017 1:19:21 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.

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,

Geoff Sellman

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 13:19

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: Wednesday, 6 December 2017 1:05:40 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)

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,
Ingrid Russell

Ingrid Russell



Wednesday, December 6, 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: Wednesday, 6 December 2017 12:41:35 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,

Tiffany Knappenberger

[REDACTED]

Wednesday, December 6, 2017 - 12:41

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: Wednesday, 6 December 2017 12:41:05 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 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, Nikki McLeod

Nikki McLeod

[REDACTED]

Wednesday, December 6, 2017 - 12:40

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: Wednesday, 6 December 2017 12:35:26 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)

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,
Merren Dargan

Merren Dargan

[REDACTED]

Wednesday, December 6, 2017 - 12:35

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, 6 December 2017 11:58:32 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)

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.

This must stop, I live in the Latrobe Valley and I have seen firsthand what three open cuts can do it when you mine for coal. Please Please don't do this to this beautiful land.

Rita Gardam

Rita Gardam



Wednesday, December 6, 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: Wednesday, 6 December 2017 11:22:30 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)

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,

Tim Cunningham

[REDACTED]

Wednesday, December 6, 2017 - 11:22

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: Wednesday, 6 December 2017 11:20:06 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.

Yours sincerely, Barry

Barry McDonald

A black rectangular redaction box covering the signature of Barry McDonald.

Wednesday, December 6, 2017 - 11:19

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: Wednesday, 6 December 2017 11:02:56 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)

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,

Anita Hayler

[REDACTED]

Wednesday, December 6, 2017 - 11:01

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: Wednesday, 6 December 2017 10:19:26 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,

Celia Trevethan

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 10:19

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: Wednesday, 6 December 2017 10:18:28 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.

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,

Sascha Perry

[REDACTED]

Wednesday, December 6, 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: Wednesday, 6 December 2017 10:09:20 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,

Carolyn Butler

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 10:09

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, 6 December 2017 10:03:42 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,

Chandra Easton

Chandra Easton

A black rectangular redaction box covering the signature of Chandra Easton.

Wednesday, December 6, 2017 - 10:03

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: Wednesday, 6 December 2017 9:51:49 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,

David Noble

[Redacted signature]

Wednesday, December 6, 2017 - 09:51

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: Wednesday, 6 December 2017 9:33:22 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,

Marion Meier

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 09:32

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: Wednesday, 6 December 2017 9:32:41 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)

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,

Laura Murray

A black rectangular redaction box covering the contact information of the sender.

Wednesday, December 6, 2017 - 09:31

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: Wednesday, 6 December 2017 9:04:44 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.

Yours sincerely,
Ian

Ian Reed

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 09:04

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, 6 December 2017 8:58:58 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,

Anna Micalos

[REDACTED]

Wednesday, December 6, 2017 - 08:58

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, 6 December 2017 8:56:28 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.

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 Geappen

[REDACTED]

Wednesday, December 6, 2017 - 08:56

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, 6 December 2017 8:28:59 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,

Maggie May

[REDACTED]

Wednesday, December 6, 2017 - 08:28

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: Wednesday, 6 December 2017 8:24:22 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,

Kylie Sylvester

[REDACTED]

Wednesday, December 6, 2017 - 08:24

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: Wednesday, 6 December 2017 8:22:50 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)

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.

I have family here, some day I will want to visit. It astounds me people need to voice to you the concern for the earth and it's benefits while cared for, not pillaged.

Yours sincerely,
Laurie Bowser

Laurie Bowser

[REDACTED]

Wednesday, December 6, 2017 - 08:22

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: Wednesday, 6 December 2017 8:13:58 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,

Heather Shimmen

[REDACTED]

Wednesday, December 6, 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, 6 December 2017 8:11:14 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.

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,

Stefanie Hasleton

Stefanie Hasleton

[REDACTED]

Wednesday, December 6, 2017 - 08:10

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, 6 December 2017 8:07:09 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 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 e Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Surely no civilised country would countenance the destruction of such a unique landscape and its surroundings for short term gain

Yours sincerely,

Paul Wheeler's

Paul Wheeler

[Redacted signature]

Wednesday, December 6, 2017 - 08:07

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, 6 December 2017 8:02:53 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.

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,

Pauline Leister

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 08:02

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, 6 December 2017 8:01:26 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.

Are you fucking insane? No, really. Are you?

Yours sincerely,

David Every

[REDACTED]

Wednesday, December 6, 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: Wednesday, 6 December 2017 7:54:01 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.

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,
Elizabeth Oates

elizabeth Oates

[REDACTED]

Wednesday, December 6, 2017 - 07:53

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, 6 December 2017 7:51:09 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 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,
Elizabeth Vesely

elizabeth Vesely

[REDACTED]

Wednesday, December 6, 2017 - 07:50

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: Wednesday, 6 December 2017 7:43:39 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,

Bianca Mackail

[REDACTED]

Wednesday, December 6, 2017 - 07:43

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: Wednesday, 6 December 2017 7:02:53 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.

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,

Amanda Hood

A black rectangular redaction box covering the contact information of Amanda Hood.

Wednesday, December 6, 2017 - 07:02

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, 6 December 2017 6:52:29 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)

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,

Pauline Cannata

A black rectangular redaction box covering the signature area.

Wednesday, December 6, 2017 - 06:52

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: Wednesday, 6 December 2017 6:46:00 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,
Terri Ward

Terri Ward

A black rectangular redaction box covering the contact information of Terri Ward.

Wednesday, December 6, 2017 - 06:45

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: Thursday, 7 December 2017 8:27:25 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,
Lorna McKenzie

Lorna McKenzie



Thursday, December 7, 2017 - 08:27