

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 8:31:49 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,
Jen Dustmann

Jennifer Dustmann

[REDACTED]

Sunday, December 3, 2017 - 08:31

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 8:30:00 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,

Simon Nulty

A black rectangular redaction box covering the contact information of Simon Nulty.

Sunday, December 3, 2017 - 08:29

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 8:27:16 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,

Hania Walczowska

Hania Walczowska

[REDACTED]

Sunday, December 3, 2017 - 08:27

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: Sunday, 3 December 2017 8:24:54 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.

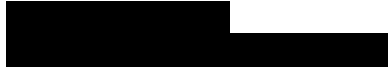
Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

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,
Glen Halliday

Glen Halliday

A black rectangular redaction box covering the signature area.

Sunday, December 3, 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: Sunday, 3 December 2017 8:22:07 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,

Lizzi and John Swatland

Lizzi Swatland

A black rectangular redaction box covering the contact information of Lizzi Swatland.

Sunday, December 3, 2017 - 08:21

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: Sunday, 3 December 2017 8:19:20 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,

David Moore

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 08:19

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: Sunday, 3 December 2017 8:17:49 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,

Jan Friar

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 08:17

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 8:14:50 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. Coal is dead!!!

Yours sincerely,
Jodie Dunning

Jodie Dunning

[REDACTED]

Sunday, December 3, 2017 - 08:14

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 8:11:55 AM

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

Dear Mr Forward,

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

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,
Elaine Hamer

Elaine Hamer



Sunday, December 3, 2017 - 08:11

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: Sunday, 3 December 2017 8:09:08 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 for one certainly pray that this sensitive and Important site remains intact as it is forever and in my opinion it should be mad so under an act of law.

Yours sincerely,
Dianne Wilson

Dianne Wilson

[REDACTED]

Sunday, December 3, 2017 - 08:09

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 8:07:21 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,

Nigel Carter

A black rectangular redaction box covering the signature area.

Sunday, December 3, 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: Sunday, 3 December 2017 8:00:44 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,

Lionel Doolan

Lionel Doolan

A black rectangular redaction box covering the signature area.

Sunday, December 3, 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: Sunday, 3 December 2017 7:53:22 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,

Roland Everingham

[REDACTED]

Sunday, December 3, 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: Sunday, 3 December 2017 7:52:21 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,
Leonardakk

Leonarda Kozdras

[REDACTED]

Sunday, December 3, 2017 - 07:52

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: Sunday, 3 December 2017 7:50:27 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,

Elaine Searle

Elaine Searle

A black rectangular redaction box covering the signature area.

Sunday, December 3, 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: Sunday, 3 December 2017 7:48:53 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,

Anne Collins

A black rectangular redaction box covering the contact information of Anne Collins.

Sunday, December 3, 2017 - 07:48

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 7:44:46 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,
Trevalyn Ward

Trevalyn Ward



Sunday, December 3, 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: Sunday, 3 December 2017 7:42:39 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.

Once our beautiful landscapes are destroyed they CANNOT be rehabilitated.

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

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

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

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

Yours sincerely,

John Couani

John Couani

[REDACTED]

Sunday, December 3, 2017 - 07:42

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 7:41:40 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,

Loris Thurgar

Loris Thurgar

[REDACTED]

Sunday, December 3, 2017 - 07:41

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: Sunday, 3 December 2017 7:40:42 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. Australia's unique and beautiful wild places are our heritage - don't destroy this for our children and their children for all time! Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Kate McIntyre

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 07:40

From: [REDACTED]
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 7:40:36 AM

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

Dear Mr Forward,

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

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

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,

Linda Smith

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 07:40

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: Sunday, 3 December 2017 7:32:51 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 thompson

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 07:32

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: Sunday, 3 December 2017 7:31:24 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,
Rebecca Browning

Rebecca Browning



Sunday, December 3, 2017 - 07:31

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 7:31:07 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,

Mandy Butler

[REDACTED]

Mandy Butler

[REDACTED]

Sunday, December 3, 2017 - 07:30

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 7:29:44 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,
Richard Maude

Richard Maude

[Redacted signature]

Sunday, December 3, 2017 - 07:29

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 7:26:53 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,

Paul Colcheedas

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 07:26

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 7:20:05 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.

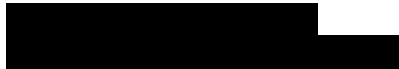
Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any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

Please conserve our wilderness heritage for our great children . We need to consider the consequences of our actions ipon Earth. Our planet is a living breathing incredible eco system . There is great opportunity to support renewable energies in NSW.

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

Yours sincerely,
Catherine Shead

Catherine Shead



Sunday, December 3, 2017 - 07:19

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: Sunday, 3 December 2017 7:15:06 AM

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Candace Coughlan

Candace Coughlan

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 07:14

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 7:10:29 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,

Paulp Horne

A black rectangular redaction box covering the contact information of Paulp Horne.

Sunday, December 3, 2017 - 07:10

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: Sunday, 3 December 2017 7:09:47 AM

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

Dear Mr Forward,

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

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,

Dai Fleming

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 07:09

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: Sunday, 3 December 2017 7:08:57 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.

Please protect the beautiful Gardens of Stone and surrounding forests for future generations!
Solar power is a more sustainable & cleaner option for future sources of power in Australia!

Yours sincerely,

Susanne Braun

Susanne Braun

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 07:08

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: Sunday, 3 December 2017 7:05:28 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.

We are lucky to have such a beautiful environment. Let's protect it.

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

Yours sincerely,

Patou Clerc

Patou Clerc

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 07:05

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: Sunday, 3 December 2017 6:59:41 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.

For all the reasons below and because coal has less and less of a place in power generation.

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,

Carla Billinghamurst

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 06:59

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: Sunday, 3 December 2017 6:56:01 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,

Janneia Searle

[REDACTED]

Sunday, December 3, 2017 - 06:55

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: Sunday, 3 December 2017 6:52:48 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,

Sally Wolfhagen

A black rectangular redaction box covering the signature area.

Sunday, December 3, 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: Sunday, 3 December 2017 6:52:46 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,

Sally Wolfhagen

A black rectangular redaction box covering the signature area.

Sunday, December 3, 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: Sunday, 3 December 2017 6:51:20 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.

I want my children to have the opportunity to see this beautiful landscape unscathed. We are but custodians of this land it is our job to protect and nurture it for the benefit of future generations.
The Commission may publish my name and this submission but not my location.
Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Fionna Rosso

Fionna Rosso

[REDACTED]

Sunday, December 3, 2017 - 06:51

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: Sunday, 3 December 2017 6:47:43 AM

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

Dear Mr Forward,

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

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,

Fariba Niktavakoli

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 06:47

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: Sunday, 3 December 2017 6:44:05 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,
Jennie Roddenby

Jennie Roddenby



Sunday, December 3, 2017 - 06:43

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: Sunday, 3 December 2017 6:43:25 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,

Marilyn Schroeder

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 06:43

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: Sunday, 3 December 2017 6:38:49 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.l

Yours sincerely,

June Treloar

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 06:38

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: Sunday, 3 December 2017 6:37:22 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

Kristina Cabala

Kristina Cabala

[REDACTED]

Sunday, December 3, 2017 - 06:37

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 6:31:34 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,

Michelle Sharma

Michelle sharma

[REDACTED]

Sunday, December 3, 2017 - 06:31

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 6:29:09 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,

Sue Watts

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 06:28

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: Sunday, 3 December 2017 6:27:26 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,

Fiona Nux

[REDACTED]

Sunday, December 3, 2017 - 06:27

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: Sunday, 3 December 2017 6:24:34 AM

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

Dear Mr Forward,

When we know that the world is already in a critical condition why are you even thinking about allowing this beautiful place into
A a disaster area.

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,

Tahira Lewis

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

Sunday, December 3, 2017 - 06:24

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 6:18:51 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,

Jo McKenzie

[REDACTED]

Sunday, December 3, 2017 - 06:18

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: Sunday, 3 December 2017 6:10:37 AM

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

Dear Mr Forward,

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

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. We have seen the environmental destruction that has occurred in the Hunter Valley, both landscape and water table and river systems , have been iraversably damaged beyond repair. The now heritage listed farm of Peter Andrews also being under threat from the Government and coal mines. Isn't any of our unique landscape free from the destruction of coal mining ?

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

Yours sincerely,

Fred Haskins

[REDACTED]

Sunday, December 3, 2017 - 06:10

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: Sunday, 3 December 2017 6:07:25 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.

This is an amazing ecosystem a garden of unique nature that we are privileged to be able to visit.

Please do not destroy this area the wildlife that habit this area and take away the opportunity for our children to experience

Yours sincerely,

Kate C

Catherine Clissold

[REDACTED]

Sunday, December 3, 2017 - 06:07

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: Sunday, 3 December 2017 6:03:50 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.

Yours sincerely,

Wendy Carr

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 06:03

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: Sunday, 3 December 2017 6:01:30 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,

Peter Sinclair

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 06:01

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: Sunday, 3 December 2017 5:56:24 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)

We will lose a significant part of our state's natural heritage and I therefore object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive and unique 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 a sad loss for future outdoor activities and 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.

As a scout leader I see the loss of great areas to train and challenge our young people completing adventurous activities. 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 and adventurous activity 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.

Please protect irreplaceable natural places for our grandchildren. 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.

This could be a significant area in our natural wilderness. 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.

I wonder how we can afford to lose more natural landscapes for recreational and leisure use. 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.

Now is the time to act to support wider community access for generations. 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 and the time you have taken considering this proposal which is against the interests of our future generations.

Yours sincerely,

Linda Soars

Linda Soars

[REDACTED]

Sunday, December 3, 2017 - 05:56

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: Sunday, 3 December 2017 5:54:03 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,

Janelle de Soza

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 05:53

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: Sunday, 3 December 2017 5:53:05 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,

Susie Ashton

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 05:52

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: Sunday, 3 December 2017 5:29:48 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,
Di Westaway

Diane Westaway

[REDACTED]

Sunday, December 3, 2017 - 05:29

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 5:04:53 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,

James Caspar

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 05:04

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: Sunday, 3 December 2017 3:49:01 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 strongly object to the proposed modification of the Invincible coal mine. 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. Therefore, isn't it obvious that open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. Seriously, why is it necessary to keep begging to save these beautiful, parts of our country?

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,
Natalie Samuels

Natalie Samuels

[REDACTED]

Sunday, December 3, 2017 - 03:48

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 2:31:53 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,

Heather Rogalski

[REDACTED]

Sunday, December 3, 2017 - 02:31

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 2:27:45 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.

Please preserve our wilderness for future generations.

Sincerely,

R Erby

Ruth Erby

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 02:27

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: Sunday, 3 December 2017 2:27:43 AM

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

Dear Mr Forward,

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

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.

Please preserve our wilderness for future generations.

Sincerely,

R Erby

Ruth Erby

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 02:27

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: Sunday, 3 December 2017 2:01:26 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.

Yours sincerely,

Helen Reynolds

[REDACTED]

Sunday, December 3, 2017 - 02:01

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: Sunday, 3 December 2017 1:54:17 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 is wrong to increase coal mining anywhere at all, let alone in such a precious place. 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 any where goda 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 Robinson
[REDACTED]

[REDACTED]
Sunday, December 3, 2017 - 01:54

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 1:24:36 AM

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

Dear Mr Forward,

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

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

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,

Bobbi Lochtenberg

[REDACTED]

Sunday, December 3, 2017 - 01:24

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 12:51:46 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,

Ian Harley

[REDACTED]

Sunday, December 3, 2017 - 00:51

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: Sunday, 3 December 2017 12:51:02 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,

Byron Golby

[REDACTED]

Sunday, December 3, 2017 - 00:50

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: Sunday, 3 December 2017 12:49:20 AM

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

Dear Mr Forward,

Given the need to transition to renewables and the current problems with climate change- we should not damage this amazing environment for a dead mine. J

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.

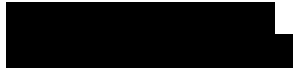
Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

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, Lyn Bender

Lyn Bender

A black rectangular redaction box covering the contact information of Lyn Bender.

Sunday, December 3, 2017 - 00:49

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 12:47:43 AM

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

Dear Mr Forward,

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

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,

Jodi Honnor

[REDACTED]

Sunday, December 3, 2017 - 00:47

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: Sunday, 3 December 2017 12:45:39 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,

Lindsay Warden

[REDACTED]

Sunday, December 3, 2017 - 00:45

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: Sunday, 3 December 2017 12:43:53 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.

This area is so unique and special it must not be destroyed by mining, it would be criminal in my view as it should be untouched for future generations to enjoy .

Yours sincerely,
Brian Elliott

Brian Elliott

[REDACTED]

Sunday, December 3, 2017 - 00:43

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: Sunday, 3 December 2017 12:43:31 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,
Laurie Atlee

laurie atlee

[REDACTED]

Sunday, December 3, 2017 - 00:43

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: Sunday, 3 December 2017 12:40:09 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,

Margot Ayres

[REDACTED]

Sunday, December 3, 2017 - 00:39

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: Sunday, 3 December 2017 12:37:01 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,

Marr Leigh-Jones

[REDACTED]

Sunday, December 3, 2017 - 00:36

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 12:33:58 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,
Linda

Linda Swinfield

[REDACTED]

Sunday, December 3, 2017 - 00:33

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: Sunday, 3 December 2017 12:30:46 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,

Katia Falco

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 00:30

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 12:29:28 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,

Melinda Sheldon

[REDACTED]

Sunday, December 3, 2017 - 00:29

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 12:28:51 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,

Susan Wedd

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 00:28

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: Sunday, 3 December 2017 12:25:10 AM

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

Dear Mr Forward,

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

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 Duigu

Gabrielle Duigu

[REDACTED]

Sunday, December 3, 2017 - 00:25

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 12:23:36 AM

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

Dear Mr Forward,

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

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

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 Edmondstone

[REDACTED]

Sunday, December 3, 2017 - 00:23

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: Sunday, 3 December 2017 12:14:51 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.

Mining the coal is a short term solution for whatever the planned usage of it is going to be, work out a long term solution & leave the landscape as it is

for future generations to enjoy & the native fauna to live amongst. Look at the Hunter Valley for instance, the ugliness of the open cut mines, the filth of the air. What will the Great Barrier Reef be like if/when the mine goes ahead there, I can only imagine. Shame shame shame the almighty dollar speaks again, those that make the decisions aren't looking at the long term outcome of the landscape, the beauty of the area, what future generations are potentially going to miss out on, the next 200, or 500 years, only the money that can be made at this very moment, what a shame.

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,

Allison Mann

A black rectangular redaction box covering the signature area.

Sunday, December 3, 2017 - 00:14

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 12:14:24 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,

Narelle Oliver



From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 3 December 2017 12:11:14 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,

Edmund Roberts

[REDACTED]

Sunday, December 3, 2017 - 00:11

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: Sunday, 3 December 2017 12:05:51 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,

Susan Doyle

[REDACTED]

Sunday, December 3, 2017 - 00:05

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: Sunday, 3 December 2017 12:05:09 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,

Edwina Walton

[REDACTED]

Sunday, December 3, 2017 - 00:04

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: Saturday, 2 December 2017 11:54:46 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,

Annette Walton

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 23:54

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: Saturday, 2 December 2017 11:50:21 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.

Having previously worked in mining I have seen the destruction of the environment and the toxic legacy of these operations first hand. There is no justification to allow this to happen in such a beautiful and ecologically sensitive area for such a small short term gain for a very few people. Surely common sense and sanity dictates that the money available to develop such a blight on the land would be much, much better spent marketing the area as a tourist destination with its proximity to Sydney and developing the opportunities to advance the indigenous people and their knowledge.

Yours sincerely,
Glenn Gerrard

Glenn Gerrard

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 23:50

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: Saturday, 2 December 2017 11:50:19 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.

Having previously worked in mining I have seen the destruction of the environment and the toxic legacy of these operations first hand. There is no justification to allow this to happen in such a beautiful and ecologically sensitive area for such a small short term gain for a very few people. Surely common sense and sanity dictates that the money available to develop such a blight on the land would be much, much better spent marketing the area as a tourist destination with its proximity to Sydney and developing the opportunities to advance the indigenous people and their knowledge.

Yours sincerely,
Glenn Gerrard

Glenn Gerrard

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 23:50

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: Saturday, 2 December 2017 11:38:27 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 are 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,

Dorothy Hoddinott

Dorothy Hoddinott

[REDACTED]

Saturday, December 2, 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: Saturday, 2 December 2017 11:36:18 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 object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the "highest and best use of the area is for conservation purposes" and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

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

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

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

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

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

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

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

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

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

This planet is ours and we should take care of it, protect nature and environment. We cannot go on to disturb everything just for profit.

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

Yours sincerely,

Lisa Natterer

[REDACTED]

Saturday, December 2, 2017 - 23:36

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 11:36:13 PM

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Bron Montgomery

bron Montgomery

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 23:36

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 11:34:03 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,

Kelly Manchee

[REDACTED]

Saturday, December 2, 2017 - 23:33

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 11:26:28 PM

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

Dear Mr Forward,

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

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

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.

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,
Marc Kiho.

Marc Kiho

[REDACTED]

Saturday, December 2, 2017 - 23:26

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: Saturday, 2 December 2017 11:24:52 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.

I live in this area and I am angry to think that you are willing to allow the destruction of this unique area. It cannot be rehabilitated when the coal company is finished destroying it. There is no other place like the Gardens of Stone. When will politicians realize that coal is past its use by date. Look to the future stop destroying Australia.

Debra Cook

[REDACTED]

Saturday, December 2, 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: Saturday, 2 December 2017 11:21:18 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)

Please leave this region untouched!

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 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,

Nicholas Mariette

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 23:21

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 11:18:16 PM

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Karina Pettigrew

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 23:17

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 11:13:13 PM

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Elizabeth Holt

[REDACTED]

Saturday, December 2, 2017 - 23:12

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 11:10:53 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,

Karin Hackl

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 23:10

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: Saturday, 2 December 2017 11:04:31 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,

Anne Sinclair

Anne Sinclair

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 23:04

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: Saturday, 2 December 2017 11:03:37 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.

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Kate Cummins

[REDACTED]

Saturday, December 2, 2017 - 23:03

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:58:07 PM

Dear Mr. Forward,

Please find below my formal letter in obligation to the approval of such a travesty.

Australia has been destroying it's natural beauty and is contributing to the production of green house gases in an age where we should have the intelligence to realise that this is all we have. Once the resources have been depleted beneath us, it wont matter for renewables, because the acceleration of weather disruption and temperature increase will be out of control.

Please ask yourself what sort of a world you would want to see for your family. If you can remember a time as a young child finding peace and wonder in a natural setting, please draw on that memory of beauty and connectedness to save what you have the influence to save.

Stop killing our host planet.

Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
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,
KRISTINA MARKOS

Kristina Markos

[REDACTED]

Saturday, December 2, 2017 - 22:57

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:55:05 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,
Zanee Cushway

Zanee Cushway

[REDACTED]

Saturday, December 2, 2017 - 22:54

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: Saturday, 2 December 2017 10:53:10 PM

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

Dear Mr Forward,

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

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this area. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years.

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 and irreplaceable. The proposal will affect 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.

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.

Lets acknowledge the value of these sites before they are gone!

Yours sincerely,
Naomi Grice

Naomi Grice
[REDACTED]

Saturday, December 2, 2017 - 22:52

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:43:08 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 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 Nau

[REDACTED]

Saturday, December 2, 2017 - 22:42

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:42:07 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,
Angie stephenson

Angie Stephenson

[REDACTED]

Saturday, December 2, 2017 - 22:41

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: Saturday, 2 December 2017 10:41:29 PM

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

Dear Mr Forward,

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

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

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

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

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

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

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

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,

Dominic Stone

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 22:41

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: Saturday, 2 December 2017 10:39:09 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.

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

Yours sincerely,

Thea Eves

Thea Eves

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 22:39

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: Saturday, 2 December 2017 10:38:42 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 Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Jessica Douglas -Henry

Jessica Douglas-Henry

[REDACTED]

Saturday, December 2, 2017 - 22:38

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: Saturday, 2 December 2017 10:30:43 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,

Vanessa Lake

Vanessa Lake

[REDACTED]

Saturday, December 2, 2017 - 22:30

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:29:08 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 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 Aconley

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 22:29

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:25:52 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,

Suzie Holmes

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 22:25

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: Saturday, 2 December 2017 10:22:01 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.

We must protect our environment for future generations. I want my young grand children to enjoy the beauty of this area just like I have. Please No more coal mining.

Yours sincerely,
Marie Richards

Marie Richards



Saturday, December 2, 2017 - 22:21

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:20:58 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,

Genevieve d'Ament

A black rectangular redaction box covering the signature area.

Saturday, December 2, 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: Saturday, 2 December 2017 10:19:02 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.

As a former resident of the Blue Mountains for over 20 years, and currently a frequent visitor to this unique pagoda country I vigorously oppose this submission for an open-cut coal mine. The potential for seriously damaging the unique environment of the surrounding, World Heritage area is too great and would be a serious failure on the part of decision-makers in this regard.

Thank you for the opportunity to comment.

Yours sincerely,

Luke Mulders

Luke Mulders

[REDACTED]

Saturday, December 2, 2017 - 22:18

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: Saturday, 2 December 2017 10:18:32 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,
Lisa hurkstone

Lisa Hurlstone



Saturday, December 2, 2017 - 22:18

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: Saturday, 2 December 2017 10:16:30 PM

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

Dear Mr Forward,

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

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,

Pamela Hoban

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 22:16

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: Saturday, 2 December 2017 10:15:17 PM

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

Dear Mr Forward,

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

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 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. I urge you to 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,

Sue Young

Sue Young

[REDACTED]

Saturday, December 2, 2017 - 22:15

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:13:45 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,

Brioney Ferguson

[REDACTED]

Saturday, December 2, 2017 - 22:13

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: Saturday, 2 December 2017 10:07:59 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,

robbie robinson

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 22:07

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:07:56 PM

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

Dear Mr Forward,

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

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,

Dave Hunter

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 22:07

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:07:11 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. If, 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 - then why is this matter still in the spotlight?

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. It is a no-brainer to maintain the precinct around the Gardens of Stone - they are a RARE and PRECIOUS natural feature in Australia.

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.

WHY DO GOVERNMENTS NEVER TAKE WHOLE OF OPERATIONS (including legacy restorative operations) INTO ACCOUNT?

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.

WHY DO GOVERNMENTS NEVER LOOK AT THE RISK THAT COMPANIES WILL NOT COMPLY WITH

OPERATIONAL CONDITIONS - the fines are so petty, it is worth the financial risk for companies - BUT IT IS NOT WORTH THE ENVIRONMENTAL RISK.

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,

Barbara M Junghans

Barbara Junghans

[REDACTED]

Saturday, December 2, 2017 - 22:07

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:05:37 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.

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,

Peter Chouque

A black rectangular redaction box covering the contact information of Peter Chouque.

Saturday, December 2, 2017 - 22:05

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:05:22 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,

Matt Dowdney

A black rectangular redaction box covering the signature area.

Saturday, December 2, 2017 - 22:05

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 10:04:16 PM

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Monica Redden

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

Saturday, December 2, 2017 - 22:04

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: Saturday, 2 December 2017 9:50:35 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,
Michelle Kelly

Michelle Kelly

[REDACTED]

Saturday, December 2, 2017 - 21:50

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: Saturday, 2 December 2017 9:45:13 PM

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Tony Black

[REDACTED]

Saturday, December 2, 2017 - 21:45

From: [REDACTED]
To: [PAC Enquiries Mailbox](#)
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Saturday, 2 December 2017 9:44:50 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,

Greg Blundell

[REDACTED]

Saturday, December 2, 2017 - 21:44

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: Sunday, 3 December 2017 8:34:02 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,

Nyarie Hassal-Abbey

[REDACTED]

Sunday, December 3, 2017 - 08:33