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

Dear Mr Forward,

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

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

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

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

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

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

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

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.
Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

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

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

Yours sincerely,

Adrian Spragg

Tuesday, November 21, 2017 - 14:22
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Alex Mateer

Thursday, November 16, 2017 - 08:13
Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Alice Wood

Alice Wood

Wednesday, November 22, 2017 - 20:04
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Alison stubbings

Alison stubbings

Wednesday, November 22, 2017 - 23:14
Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Amanda Drinkwater

Sunday, November 19, 2017 - 14:09
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Amanda Lissarrague

Saturday, November 18, 2017 - 18:34
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Andrew Wills

Sunday, November 19, 2017 - 11:57
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Ann Leahy

Ann Leahy
Saturday, November 18, 2017 - 20:40
From: PAC Enquiries Mailbox
To: Mr Paul Forward
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Tuesday, 21 November 2017 7:24:41 AM

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Anna Ossig

Anna Ossig

Tuesday, November 21, 2017 - 07:24
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.
I will add to this that I own a property in Lithgow, which some would suggest means that I believe in the need for continued coal mining in the area, this could not be further from my position.
I believe that the continued mining of coal for the production of electricity is not of any long term benefit, frankly it is short sighted and dangerous, on so very many levels.
Yours sincerely,
Anthony Cahill

Anthony Cahill

Tuesday, November 21, 2017 - 19:52
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

This is another incredibly significant, long term decision required by our society. Previous versions of these coal mines have sown that do not properly remediate the natural environment in these areas and there is no appropriate “offsetting”. The desperate efforts in coal mining are reaching their limits and these industries need to move on and develop new methods of steel and energy production and resource recovery. Any company that is not doing this does not deserve to any further license for environmental destruction through extractive processes.

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

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

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

Yours sincerely,
Antony LEWIS BE, MBT

Antony LEWIS

Monday, November 13, 2017 - 19:33
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

B King

Monday, November 20, 2017 - 19:03
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

ben harris

Monday, November 20, 2017 - 20:02
Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Beth King

Friday, November 17, 2017 - 17:56
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Beverley Thompson

Friday, November 17, 2017 - 10:59
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Bill Harvey

Wednesday, November 15, 2017 - 15:55
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

I completely oppose any mining in this area.

Bob Head

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

Dear Mr Forward,

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

I completely oppose any mining in this area.

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Bronwyn Rees

Bronwyn Rees

Saturday, November 18, 2017 - 08:00
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Carol Henry

Carol Henry

Saturday, November 18, 2017 - 10:17
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Cathryn Hantos

Sunday, November 19, 2017 - 09:36
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Chelsea Corlett

Saturday, November 18, 2017 - 10:20
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Cheryl Cordery

Cheryl Cordery

Thursday, November 23, 2017 - 07:25
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,  

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

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

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

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

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

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

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

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

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

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

Chia Moan

Monday, November 20, 2017 - 08:29
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Chris Bolenski

Friday, November 17, 2017 - 22:12
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Chris Hudson

Wednesday, November 15, 2017 - 18:47
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Christine Corner
Thursday, November 23, 2017 - 09:27
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Christopher Musgrove

Friday, November 17, 2017 - 17:53
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Colin F Walters

Colin Walters

Wednesday, November 15, 2017 - 14:31
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Damian Davies

---

Sunday, November 19, 2017 - 16:59
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

HANDS OFF COUNTRY!!!!

Sincerely,

D.T. KIND

Danielle Kind

Saturday, November 18, 2017 - 19:59
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

David HUfton

Thursday, November 16, 2017 - 21:39
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

David Hutchinson

Tuesday, November 21, 2017 - 21:53
Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

David ---

Wednesday, November 15, 2017 - 14:20
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Debbie Beckwith

Saturday, November 18, 2017 - 20:02
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Debbie Mitchell-davis

Sunday, November 19, 2017 - 10:05
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Deborah Stone
Monday, November 20, 2017 - 08:47
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Dianne Pells

Dianne Pells
Tuesday, November 21, 2017 - 18:29
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

I have no faith in this process, but because I care I will submit if not for me but for my grandchildren.
At least when the devastation appears in time my name won’t be mentioned as one being the destructive imbecile who gave no thought or duty of care for future generations to experience.

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

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

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.
Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

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

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

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

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

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

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

Yours sincerely,

Dinna Upton

Wednesday, November 15, 2017 - 05:46
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Don Thompson

Don Thompson
Saturday, November 18, 2017 - 11:15
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Elaine Trotman

Saturday, November 18, 2017 - 19:03
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Libby Gahl

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

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

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

Elisabeth Gahl

Monday, November 20, 2017 - 08:50
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Eliza Allan

Tuesday, November 14, 2017 - 05:15
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Eloise Fisher

Eloise Fisher

Friday, November 17, 2017 - 18:06
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Emily Brayshaw

Emily Brayshaw
Sunday, November 19, 2017 - 16:49
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Emmalie Sanders

Tuesday, November 21, 2017 - 20:56
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely

Fiona Chappell

Wednesday, November 22, 2017 - 01:54
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward  

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Fiona Sim

Monday, November 20, 2017 - 15:44
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Gabrielle Richardson

Friday, November 17, 2017 - 19:24
Mr Paul Forward 
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Gemma Matteson

Sunday, November 19, 2017 - 23:02
Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Geoff Mosley

Tuesday, November 14, 2017 - 10:57
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Geoffrey Fox

Geoffrey Fox

Sunday, November 19, 2017 - 16:25
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small  
area of which the woodlands affected by the proposed Invincible open-cut  
mining operation is a key part. The modification proposal is a key part of  
the only area where grassy tableland woodlands adjoin pagodas. This woodland  
is an integral part of this pagoda landscape and its loss will compromise  
this beautiful pagoda landscape.
The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

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

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

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

Yours sincerely,
Gerarda mader.

Gerarda Mader

Tuesday, November 21, 2017 - 22:56
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07.0127 MOD 5 (D490/17)

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

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

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

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

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

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

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

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

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

Grahame Edwards

Monday, November 13, 2017 - 17:29
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Grahame Coote

Grahame Coote

Tuesday, November 21, 2017 - 20:27
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Gregory Olive

Tuesday, November 21, 2017 - 17:49
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
H Shields

H Shields

Sunday, November 19, 2017 - 00:42
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,  

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

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

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

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

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

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

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

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

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.
The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

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

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

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

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

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

Yours sincerely,

Helene

Helene Zampetakis

Friday, November 17, 2017 - 16:58
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Heng K Tey

Monday, November 20, 2017 - 20:15
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Honor McGregor

Tuesday, November 21, 2017 - 18:36
Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Wednesday, November 22, 2017 - 17:21
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Isabel Robinson

Saturday, November 18, 2017 - 07:45
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Janet Mayer

Tuesday, November 21, 2017 - 23:03
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Janine

Janine Nielsen

Tuesday, November 21, 2017 - 10:37
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Jason Edwards

Tuesday, November 21, 2017 - 12:32
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

J Robertson

Jeanette Robertson

Thursday, November 16, 2017 - 12:20
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,
Jenni Warren

Jenni Warren
Sunday, November 19, 2017 - 21:10
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

Dear Mr Forward,

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely,

Jeremy Gordon

Tuesday, November 21, 2017 - 21:40
Dear Mr Forward,

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

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

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

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Jesse Baravykas

Jesse BARAVYKAS
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape. Having bushwalked in this amazing landscape, I have had personal experience of the uniqueness of this landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

John Park

John Park

Tuesday, November 21, 2017 - 15:26
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

Please uphold the previous decisions of the PAC and refuse consent for the proposed Invincible mine, modification 5. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape. It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest.

I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368
hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

John Pettit

Monday, November 20, 2017 - 13:55
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I do not consider it appropriate that after the previous determination a substantially similar mine proposal has been submitted. The area will have outstanding conservation values, until a single approval is approved. If there are multiple applications then the risk to the area is the sum of the applications. As such once an application has been denied this determination should apply to further applications.

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut
mining operation is a key part. The modification proposal is a key part of
the only area where grassy tableland woodlands adjoin pagodas. This woodland
is an integral part of this pagoda landscape and its loss will compromise
this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed
2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the
surrounding woodlands that are proposed to be mined. The buffer debate was
part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed
biodiversity offsets do not replace the unique Ben Bullen pagoda landscape.
The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or
Departmental analysis has come forward that could overturn the last PAC
determination. Refuse consent for the proposed Invincible mine, modification
5 as the applicant and Department of Planning and Environment have not
provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you
for the opportunity to comment on this mining proposal.

Yours sincerely,

John Robens
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object and equally oppose the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation. So why is even being put forward.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Julie Favell

Wednesday, November 22, 2017 - 07:18
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Julie Whittlam

[Signature]

Wednesday, November 22, 2017 - 12:28
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Karin Steininger

Karin Steininger
Friday, November 17, 2017 - 18:37
Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

kate Girdwood

Tuesday, November 21, 2017 - 18:17
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation. It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Katherine.

Katherine littlewood

Wednesday, November 22, 2017 - 18:24
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Katrina

Katrina Khoupongsy

Friday, November 17, 2017 - 18:43
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Katriona herborn

Katriona Herborn

Tuesday, November 21, 2017 - 18:13
Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, 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,

Kelly Ost

Monday, November 20, 2017 - 09:57
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

In an era where the world is rapidly migrating to renewable energy production and storage in an attempt to avoid catastrophic climate change the approval of new or expanded coal mines is morally and ethically perverse in the extreme. Apart from damage & potential damage in and near the mine area adding more carbon into an already overloaded environment is madness. It will contribute to our Pacific & Indian Ocean neighbours literally disappearing under the waves, mass forced migration of billions of people, destruction of agricultural land through drought and flood accompanied by global food and freshwater shortages. An increase in numbers and area tropical diseases, more deaths from heat in the world's most populous areas and $10s of trillion in infrastructure damage globally will also occur. Due to our geographic location Australia will be among the worst affected.

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.
Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Ken Dally

Monday, November 20, 2017 - 11:55
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Ken Foster
Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Kerrie Pierce

Monday, November 20, 2017 - 10:30
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Ms Kim Mckay

Kim Mckay
Monday, November 13, 2017 - 19:59
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

Whilst I concede this is a form letter, reading through it, I could not word it any better myself. I therefore request you accept this as an individual submission.

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise
this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Lachlan Garland

Thursday, November 16, 2017 - 16:20
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Lawrence Tynan Curran

Sunday, November 19, 2017 - 21:13
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Leanne Jones

Sunday, November 19, 2017 - 11:12
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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 Brett

Broadbere

Wednesday, November 22, 2017 - 06:19
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Lynette Cox

Tuesday, November 21, 2017 - 21:10
Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Lynne Chillemi.

Lynne Chillemi

Thursday, November 16, 2017 - 15:08
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

This area is too magnificent to carelessly destroy for short term profit. The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Maranne Sear

Thursday, November 16, 2017 - 21:45
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Maria Lang

Wednesday, November 15, 2017 - 17:17
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

It is really distressing that this company cannot take the previous PAC ruling seriously and still wants to over ride previous decisions. when will they realise this is land which should be conserved?

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Marie Morris

Wednesday, November 15, 2017 - 14:35
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The timing is wrong with overwhelming objection to further pollution by fossil fuels, the overwhelming objection of big successful corporations like Manildra that refuse to respect the environment & conserve its unique & finite attributes, in this case The Gardens of Stone, I believe there should be mature guidance by our protective (supposedly) agencies to deter any negative impacts to such exceptional landscapes to preserve what is and will be what is of value now & for future generations. Rather than merely supporting the short term greed that does & will do little to sustain us in the long term. Instead we will be left with denuded & barren landscapes robbed of significant groundwater that maintains all ecological communities Time to change attitudes & act before it is too late Manildra has done a deal with the government, something of which we are well aware & this must not sway the ultimate decision.

Yours sincerely,
Mary Thirlwall

Mary Thirlwall

Wednesday, November 15, 2017 - 21:00
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matt Bradshaw

Friday, November 17, 2017 - 18:17
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Open cut coal mining will destroy the landscape on a far greater scale than the footprint of the mine itself. The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matthew Bell

Saturday, November 18, 2017 - 20:35
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matthew Cafe

Thursday, November 16, 2017 - 18:42
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,  

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)  

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.  

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.  

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.  

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.  

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.  

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.  

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matthew Minnett

Friday, November 17, 2017 - 22:44
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Matthew Myles

Tuesday, November 21, 2017 - 12:57
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut
coal mining should not recommence in this sensitive part of the Gardens of
Stone region. In October 2014 the Commission said that the “highest and
best use of the area is for conservation purposes” and that ruling is not
changed by the Department of Planning and Environment's (the Department's)
recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions
that had rejected open-cut mining in this 50 hectare area, as well as other
areas of public forest. I strongly oppose this Department's recommendation to
expand the open-cut area and continue coal production for eight years. As
Commissioners' would appreciate, approval of this modification is likely to
lead to incremental mine development, and the Department of Planning and
Environment is opposed to a series of incremental increases in open-cut coal
mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while
at the same time it has applied for access to coal resources in 1,368
hectares around the proposed mine site. Manildra has applied for coal
exploration licences No. 5289 and 5290 over much of the Ben Bullen State
Forest that is of high conservation value. When the modification is read in
this context it is obvious that it is not a different proposal from the
proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in
terms of overall costs, when the environment is taken into account, than coal
from existing operating mines that can meet the requirements of Manildra's
Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse
environmental outcomes upon this outstanding natural area. The true cost of
damage to the natural environment cannot be compensated by offsets, contrary
to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small
area of which the woodlands affected by the proposed Invincible open-cut
mining operation is a key part. The modification proposal is a key part of
the only area where grassy tableland woodlands adjoin pagodas. This woodland
is an integral part of this pagoda landscape and its loss will compromise
this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed
2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Maxine McKinley

Thursday, November 16, 2017 - 06:00
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tablerland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Meg Thompson

Saturday, November 18, 2017 - 11:12
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,
Merryn Campbell

Merryn Campbell

Wednesday, November 22, 2017 - 11:52
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Dear Paul,
As a frequent walker in this area and a lover of nature I recommend that this area of outstanding natural beauty be saved for future generations to enjoy. It cannot ever be properly restored to its original unique nature.

Yours sincerely,
Michael Holt

Michael Holt

Tuesday, November 21, 2017 - 13:37
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

If there are to be public hearings I would like to register to speak, amplify on this submission and present new material

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Michael Keats OAM
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Michael Macdonald

Tuesday, November 21, 2017 - 10:41
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,  

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)  

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Michael Shea

Michael Shea
Friday, November 17, 2017 - 08:25
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Michelle Jonkers

Sunday, November 19, 2017 - 20:16
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Mike Stacey

Sunday, November 19, 2017 - 07:55
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

The Gardens of Stone region must be protected. As such, I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Narelle Jarvis

Narelle Jarvis

Wednesday, November 22, 2017 - 17:40
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Nasus Selams

Saturday, November 18, 2017 - 08:09
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,
Neil Stevenson

Neil Stevenson

Wednesday, November 22, 2017 - 10:51
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut
col mining should not recommence in this sensitive part of the Gardens of
Stone region. In October 2014 the Commission said that the “highest and
best use of the area is for conservation purposes” and that ruling is not
changed by the Department of Planning and Environment's (the Department's)
recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions
that had rejected open-cut mining in this 50 hectare area, as well as other
areas of public forest. I strongly oppose this Department's recommendation to
expand the open-cut area and continue coal production for eight years. As
Commissioners' would appreciate, approval of this modification is likely to
lead to incremental mine development, and the Department of Planning and
Environment is opposed to a series of incremental increases in open-cut coal
mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while
at the same time it has applied for access to coal resources in 1,368
hectares around the proposed mine site. Manildra has been granted coal
exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State
Forest that is of high conservation value. When the modification is read in
this context it is obvious that it is not a different proposal from the
proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in
terms of overall costs, when the environment is taken into account, than coal
from existing operating mines that can meet the requirements of Manildra's
Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse
environmental outcomes upon this outstanding natural area. The true cost of
damage to the natural environment cannot be compensated by offsets, contrary
to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small
area of which the woodlands affected by the proposed Invincible open-cut
mining operation is a key part. The modification proposal is a key part of
the only area where grassy tableland woodlands adjoin pagodas. This woodland
is an integral part of this pagoda landscape and its loss will compromise
this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed
2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Nicholas Hood

Nick Hood

Monday, November 20, 2017 - 10:54
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the
surrounding woodlands that are proposed to be mined. The buffer debate was
part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed
biodiversity offsets do not replace the unique Ben Bullen pagoda landscape.
The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or
Departmental analysis has come forward that could overturn the last PAC
determination. Refuse consent for the proposed Invincible mine, modification
5 as the applicant and Department of Planning and Environment have not
provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you
for the opportunity to comment on this mining proposal.

Yours sincerely,

Nicolas Rasmussen

Wednesday, November 22, 2017 - 15:01
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,  

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)  

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.  

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.  

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.  

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.  

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.  

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.  

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

I ask each member of the commission to consider the legacy you will leave your grandchildren and their descendants. Will it be the pristine Gardens of Stone or large areas of holes in the ground and museums of what it used to look like. They may ask why did they destroy it.

Please consider carefully.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Noel Rath

Noel Rath

Tuesday, November 21, 2017 - 07:36
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I most strongly object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation. I have heard no convincing argument as to why the Department believes conservation is no longer the highest and best use of this priceless area.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.
The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Norman Sage

Wednesday, November 22, 2017 - 10:26
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment’s (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

I have visited the area where the proposed mine is planned for and the area offers many different experiences to what is offered elsewhere in the Blue Mountains. The pagodas are unique to the area and are the result of leaching of minerals from the basalt which covered the area millions of years ago into the sandstone. Erosion of the sandstone has produced rock formations not found elsewhere in the Blue Mountains. The pagodas warrant World Heritage Protection which other parts of the Blue Mountains have in place.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Paul McCann

Paul McCann

Sunday, November 19, 2017 - 18:37
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Pawel Hanasz

Pawel Hanasz

Monday, November 20, 2017 - 19:15
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

After having taken more than one premier or environment minister to this area decades ago and having been given assurances that the area was to be protected it is very frustrating to know that the government is still considering to collaborate in its destruction. I implore you to uphold previous decisions to protect the area.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Peter Maslen

Thursday, November 16, 2017 - 19:04
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Peter Morris

Monday, November 13, 2017 - 20:34
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Phillip Arundell

Sunday, November 19, 2017 - 15:15
Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the project approval for the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes”. I agree. The recommendation by the Department of Planning and Environment (the Department) is not consistent with that ruling, and the Department's recommendation should be rejected.

The Commission should adhere to its 2013 and 2014 decisions that rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose the Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment should be opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal adversely affects the only area where grassy tableland woodlands adjoin pagodas. This woodland area is an integral part of the pagoda landscape and its loss will severely compromise the beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed...
in 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets (and payments) are irrelevant to conservation of this unique pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5, as neither the applicant nor the Department has provided any basis to overturn the past decisions regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely

Phillip Cornwell

Tuesday, November 21, 2017 - 17:58
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

This proposal has a very short mine life and is extremely disproportionate to the long lasting environmental damage it will cause. Manildra could draw on reserves around the Wollongong region for it's south coast operations. Apart from these immediate concerns consider the fact that Manildra must some time in the next 8 - 10 years address alternative energy sources apart from coal. Compelling time frames would surely consign this project to the 'uneconomic basket' of national priorities. The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely, Phil Niciak

Phillip NICIAK

Wednesday, November 22, 2017 - 19:06
Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Prudence Sky
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I very strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed in 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Please refuse Manildra's proposed mine expansion and prevent further open-cut mining in the Gardens of Stone region as this proposal will destroy a valley woodland area of conservation significance and should therefore be rejected. We need to protect our pristine unique environmental areas for the generations to come. Please don't let them down.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Richard Madigan
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

Dear Mr Forward,

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC and refuse Manildra's proposed mine expansion and prevent further open-cut mining in the Gardens of
Stone region.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Rima D'Arcy
The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Rima D'Arcy

Thursday, November 16, 2017 - 11:10
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Rob Jones

Wednesday, November 22, 2017 - 03:21
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Robert Tilley

Tuesday, November 21, 2017 - 18:00
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Further, I would like to add my personal view that coal-fired power is a phenomenon of the past and, even if narrow economic considerations were to be the sole criterion for assessment of this proposal, the long-term gains to be achieved from retaining the area in its current state and using it for ecotourism will far outweigh the short-term gains to be obtained by a wrong-headed act of ecological vandalism.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Rowan Holmes

Friday, November 17, 2017 - 22:05
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Ruby Stephens

Ruby Stephens
Saturday, November 18, 2017 - 07:33
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Samantha Howe

Saturday, November 18, 2017 - 13:46
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

Please do the right thing, and admit that the continued promotion of fossil fuel mining is an industry that the rest of the world is trying to phase out. Australia should be leaders in phasing it out because we have much scope for renewable resources which will also promote employment and not damage the environment or human health.

Thank you for your consideration
Sandra Shergill

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Sandra Shergill

Saturday, November 18, 2017 - 16:38
Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,
Sarah Daniel

Sarah Daniel

Wednesday, November 22, 2017 - 19:03
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed in 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Natural stone features and the protected landscapes they shelter can not easily be replicated if they are destroyed. This sort of environmental damage would be a loss of important heritage values.

Yours sincerely,
Sarah Gunn

Sarah Gunn

Thursday, November 16, 2017 - 01:33
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,  

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)  

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.  

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.  

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.  

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.  

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.  

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.  

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the
surrounding woodlands that are proposed to be mined. The buffer debate was
part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed
biodiversity offsets do not replace the unique Ben Bullen pagoda landscape.
The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or
Departmental analysis has come forward that could overturn the last PAC
determination. Refuse consent for the proposed Invincible mine, modification
5 as the applicant and Department of Planning and Environment have not
provided any basis to overturn the past decision 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,

Sean Corrigan

Tuesday, November 21, 2017 - 17:22
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Sheila zaman

Sheila Zaman

Tuesday, November 21, 2017 - 12:22
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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 Alexander

Sunday, November 19, 2017 - 12:24
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Simon Grover

Thursday, November 16, 2017 - 19:18
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Stephanie

Stephanie Rowley

Tuesday, November 21, 2017 - 16:34
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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 Daley

Sue Daley

Tuesday, November 21, 2017 - 13:02
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission.

This unique environment and heritage must be better protected.

Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Susan Ambler

Wednesday, November 15, 2017 - 15:03
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Tam Hanson

Saturday, November 18, 2017 - 08:37
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may NOT publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Tania Kayrala

Tuesday, November 21, 2017 - 13:05
Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra's open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The PAC has previously rejected open-cut coal mining in this woodland. This proposal will also destroy a valley woodland area of conservation significance and should be rejected.

Please refuse Manildra’s proposed mine expansion and prevent further open-cut mining in the Gardens of Stone region.

The Commission may publish my name, location and this submission.

Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Thaïs Turner

Thaïs Turner

Monday, November 20, 2017 - 22:06
From: PAC Enquiries Mailbox
To: Mr Paul Forward
Subject: Submission opposing the Department of Planning and Environment's assessment of Invincible Colliery 07_0127 Mod 5 (D490/17)
Date: Sunday, 19 November 2017 9:18:04 AM

Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

This is one of the world most amazing places to explore and visit, and needs to be saved for future generations, I often take my children out there, for hikes, and camping.

Yours sincerely,
Tim Griffiths

Tim Griffiths
Sunday, November 19, 2017 - 09:17
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

One has to ask how many time we the public have to write submissions to protect this important area that has international world heritage values it is not just the Australian public but the world is now watching what will happen here!

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland
is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The State and Federal Governments need to protect the special area for international values it contains.

Thank you for the opportunity to comment

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Timothy Bidder

Monday, November 13, 2017 - 19:53
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Tommy Wiedmann

Wednesday, November 15, 2017 - 19:42
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Tor Land

Tuesday, November 21, 2017 - 20:35
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

PLEASE READ MY COMMENT ABOUT - YOUR CHILDREN -- FOLLOWING BELOW.

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.
The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

MR FORWARD, I AM APPALLED THAT YOU ARE EVEN CONTEMPLATING YOUR PLAN.

YOUR CHILDREN - AND THEIR CHILDREN WILL NEVER FORGIVE YOU!

Yours sincerely,

Trevor Giblin

Tuesday, November 21, 2017 - 11:38
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Vanessa Macedo

Vanessa Macedo

Friday, November 17, 2017 - 22:42
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Vicki Harriss

Wednesday, November 22, 2017 - 17:26
Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal. All mining must be stopped, we cannot put our water and farmland at risk. Our government is extremely short sighted and only interested in making money.

Yours sincerely,

Vicki Jenkins

Friday, November 17, 2017 - 18:58
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below...
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Wayne Barrott

Tuesday, November 21, 2017 - 21:21
Mr Paul Forward
Chairperson
Planning Assessment Commission
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision 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,

Will Whitfeld

Monday, November 20, 2017 - 10:52
Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Xanthe Alton-Edwards

Saturday, November 18, 2017 - 21:12
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Yasmin Hannouf

Saturday, November 18, 2017 - 13:59
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining is not appropriate in the unique pagoda landscape of the Gardens of Stone region and must not be allowed to recommence.

In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed
2014 that the pagoda landscape consists of the pagodas and woodlands below them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Yuri Bolotin

Friday, November 17, 2017 - 07:00
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000  

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation  
- Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners' would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has been granted coal exploration licences Nos. 8618 and 8619 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Yvonne and Richard Lollback

Tuesday, November 21, 2017 - 14:56
Mr Paul Forward  
Chairperson  
Planning Assessment Commission  
Level 3, 201 Elizabeth Street  
Sydney NSW 2000

Dear Mr Forward,

Submission Opposing the Department of Planning and Environment recommendation - Invincible Extension Project 07_0127 MOD 5 (D490/17)

I object to the proposed modification of the Invincible coal mine. Open-cut coal mining should not recommence in this sensitive part of the Gardens of Stone region. In October 2014 the Commission said that the “highest and best use of the area is for conservation purposes” and that ruling is not changed by the Department of Planning and Environment's (the Department's) recommendation.

It would be inappropriate to reverse the Commission's 2013 and 2014 decisions that had rejected open-cut mining in this 50 hectare area, as well as other areas of public forest. I strongly oppose this Department's recommendation to expand the open-cut area and continue coal production for eight years. As Commissioners would appreciate, approval of this modification is likely to lead to incremental mine development, and the Department of Planning and Environment is opposed to a series of incremental increases in open-cut coal mining in the Ben Bullen State Forest.

Manildra (Castlereagh Coal) has made the open-cut proposal small (50ha) while at the same time it has applied for access to coal resources in 1,368 hectares around the proposed mine site. Manildra has applied for coal exploration licences No. 5289 and 5290 over much of the Ben Bullen State Forest that is of high conservation value. When the modification is read in this context it is obvious that it is not a different proposal from the proposals previously rejected for this mine site.

Coal from Manildra’s open-cut Invincible mine will be more expensive in terms of overall costs, when the environment is taken into account, than coal from existing operating mines that can meet the requirements of Manildra's Bomaderry plant.

Approving Manildra’s 50 hectare open-cut proposal will impose adverse environmental outcomes upon this outstanding natural area. The true cost of damage to the natural environment cannot be compensated by offsets, contrary to the assertions made by the Department.

The Ben Bullen pagoda landscape is unique, irreplaceable and covers a small area of which the woodlands affected by the proposed Invincible open-cut mining operation is a key part. The modification proposal is a key part of the only area where grassy tableland woodlands adjoin pagodas. This woodland is an integral part of this pagoda landscape and its loss will compromise this beautiful pagoda landscape.

The Planning Assessment Commission correctly observed in 2012 and confirmed 2014 that the pagoda landscape consists of the pagodas and woodlands below
them. The pagoda rock features cannot be considered in isolation from the surrounding woodlands that are proposed to be mined. The buffer debate was part of the previous PAC review and determination that refused consent.

Further, ecosystems cannot be replanted after open-cut mining. The proposed biodiversity offsets do not replace the unique Ben Bullen pagoda landscape. The proposed offsets are irrelevant to conservation of this pagoda landscape.

Please uphold the previous decisions of the PAC. No new evidence or Departmental analysis has come forward that could overturn the last PAC determination. Refuse consent for the proposed Invincible mine, modification 5 as the applicant and Department of Planning and Environment have not provided any basis to overturn the past decision regarding these matters.

The Commission may publish my name, location and this submission. Thank you for the opportunity to comment on this mining proposal.

Yours sincerely,

Zelda Graham

Tuesday, November 14, 2017 - 10:23