

Mining and Industry Projects

NSW Department of Planning & Infrastructure

GPO Box 39 Sydney NSW 2001

Dear Sir/Madam,

**Part 3A Modification 4 – Invincible Mine Extension (07_0127 MOD 4)
and Part 3A Modification 2 – Cullen Valley Mine Extension (DA 200-5-
2003 MOD 2)**

Though living in Canberra for many years, I have visited the pagoda landform complexes in the Great Dividing Ranges North of Sydney on several occasions and regard them as fascinating, unique and fragile – worthy of permanent, inalienable conservation in the national estate and of international significance.

It is for this reason in particular that I strongly object to the proposed modifications to the **so-called** Invincible and Cullen Valley coal mines. The proposed expansions will adversely impact the internationally significant pagoda landform complex located on the western edge of the Great Dividing Range in Ben Bullen State Forest. This public forest should be fully protected from open-cut mining in a state conservation area.

The coal in this proposal is of poor quality and there are better quality substitute resources that can provide at least 25 years electricity generation by the two power plants in the Lithgow Region. The claim of increased costs to electricity consumers if the Coalpac proposal does not proceed is a wild exaggeration. As highlighted in a recent ABC TV program, 51% of the current cost of electricity is ascribable to network charges. These networks have been unjustifiably expanded in recent years because of the funding formula used by the national regulator. Nearby underground mines have provided for local electricity power plants for over 20 years.

The proposal will destroy by open-cut mining the unique biodiversity, scenery and geological values associated with the pagoda landform complex. Its outstanding values include a Grassy Box Woodland – a nationally endangered ecological community. The area also subtends many nationally endangered Clandulla geebung shrubs and some 2,300

threatened Capertee Stringybark trees. The Planning Assessment Commission recommendation for an independent vegetation study should not have been ignored.

The proposal fails to provide the 300 metre minimum buffer recommended by the Planning Assessment Commission from the base of the pagoda rock formations and the open-cut area. The buffer provides protection for wildlife including many Lyre Birds and the threatened broad headed snake. If such a buffer were provided, there would be no mine.

The proposal is less than two kilometres from Cullen Bullen and dust from this project will lead to increased morbidity and mortality in the community from respiratory and cardiovascular disease. Noise, truck movements and blasting will also adversely impact on residents. The proposal intends to vastly increase water extraction from underground workings from 26Ml/year to 750Ml/year, but fails to address the ongoing fires underground and in waste heaps. Where 2Ml/day of water pumped from old workings is to be released is not explained.

The Aboriginal cultural heritage assessment lacks credibility because it did not find a cave art site in the proposed disturbance area for the Cullen Valley Mine. Previous studies had missed other important Aboriginal cave art sites in the area.

Despite Coalpac's claim ecosystems cannot be replanted on farmland and especially after open-cut mining. No mature woodland has ever been established in mine rehabilitation. The biodiversity offsets are inadequate, and cannot replace a Gardens of Stone Stage 2 reserve. The Environmental Assessment does not deal with cumulative impacts either from Pine Dale and Neubecks Creek open-cut proposals or from future stages by Coalpac after this mine proposal is completed in four years. These proposals will further degrade an intact environment.

The pagodas, cliff and cave overhangs are susceptible to subsidence hazards yet Coalpac did not protect these features from high wall mining as recommended by the Planning Assessment Commission.

Please refuse consent to both proposed modifications and stop open-cut mining in the Gardens of Stone region.

Sincerely

Dierk von Behrens
30 April 2014