



**NSW INC1301129**

**POSTAL ADDRESS**

PO Box 4096  
KOGARAH BAY NSW 2217

**PHONE/FAX**

(02) 9546-7221

**EMAIL**

[nswheritage@outlook.com](mailto:nswheritage@outlook.com)

**WEB**

[www.facebook.com/nswheritage](http://www.facebook.com/nswheritage)

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)**

The conservation of the Blue Mountains is of great importance to all people, at all levels in all areas of New South Wales. Scientific research and public opinion strongly support the strategies by the Commonwealth and State governments to arrest land degradation, and co-operative and concerted efforts with committed community groups have made this a national environmental priority.

This letter is to register the NSW Heritage Network's strongest possible objection to these proposed modifications to the Invincible and Cullen Valley coal mines because it will adversely impact on 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 for nature conservation, recreation and tourism.

The coal in this proposal is of poor quality and there are better quality substitute resources that can provide for 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. Nearby underground mines have provided for local electricity power plants for over 20 years.

The proposal of open-cut mining, will destroy 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, many nationally endangered *Clandulla* Geebung shrubs and 2,300 threatened *Capertee* Stringybark trees. Given the importance of the natural environment, the Planning Assessment Commission recommendation for independent vegetation study should not have been ignored by *Coalpac* in its current environmental assessment.

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 26MI/year to 750MI/year, but fails to address the ongoing fires underground and in waste heaps. Where 2MI/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* rehabilitation claims, ecosystems cannot be replanted on farmland or after open-cut mining native forests. No mature woodland has ever been established through mine rehabilitation. The biodiversity offsets are inadequate, and cannot replace a Gardens of Stone Stage 2 reserve over Ben Bullen State Forest.

Protecting a wide variety of landscapes, ecosystems, plants, animals and birds, plus an outstanding tourism and recreational resource, the logic for refusing open-cut mining in this area is unassailable. Our Network urges the refusal of both proposed modifications, and in accord with The Blue Mountains community and advocate groups across the State, we implore the NSW Government to stop open-cut mining in the Gardens of Stone region.

I declare that no donations to political parties have been made by our Network in the last year.

Yours faithfully,

Leesha Payor, on behalf of *NSW Heritage Network Inc.*  
2 May 2014

*NSW Heritage Network Inc. acknowledges assistance in the preparation of this submission by*  
**The Blue Mountains Conservation Society, Colong Foundation for Wilderness**  
and the **Lithgow Environment Group** which form the Gardens of Stone Alliance (GoSA)