

Ms Carolyn McNally  
Secretary  
NSW Department of Planning

Sent by email:  
cc: Mr Matthew Sprott [matthew.sprott@planning.nsw.gov.au](mailto:matthew.sprott@planning.nsw.gov.au)

17 July 2017

Dear Ms McNally

**RE: MOUNT PLEASANT MODIFICATION 3 ENVIRONMENTAL IMPACT ASSESSMENT**

The Scone Equine Hospital appreciates the opportunity to make this submission to the Department on Mount Pleasant Modification 3 Environmental Impact Assessment.

Our submission provides information on our business, its place in the regional community, our dependence on the Hunter Valley's thoroughbred breeding industry and our concerns about, and opposition to, the proposed Mount Pleasant Modification.

The Scone Equine Hospital

The Scone Equine Hospital is a local business with a world class reputation. It is the largest veterinary practice in Australia, and indeed the Southern Hemisphere. We employ over 100 people (7 specialists, 30 veterinarians, 70 support staff) in a practice that in itself is recognised as a world class centre of equine health and research excellence. We have a proud history of over fifty years servicing our clients in Scone and the Upper Hunter.

We provide veterinary care for the second largest horse population in the world, the Hunter Valley's thoroughbred breeding industry. As a result of our specialist and world recognised work in the Hunter Valley, we also provide veterinary referral services across Australia's eastern seaboard and internationally.

The Scone Equine Hospital has strong research relationships with leading universities in Australia and around the world and is sought after to field veterinary specialist and expert advice and speakers at national and international conferences.

In addition to our veterinary care, we provide practical training for 40 veterinary students and 60 veterinary nurses each year.

In the Upper Hunter region, we are a large employer of professionals and skilled workers. Our staff and their families are long term residents and proud contributors to our local communities. Our practice sponsors and supports over fifty community groups and organizations and is a sponsor of major horse related events in the Upper Hunter.

## Our Future – Inextricably linked to the Thoroughbred Breeding Industry

The Scone Equine Hospital has substantial plans to invest and grow. These plans include:

- building a State-of-the-Art Veterinary Hospital (an investment in excess of \$12m resulting in construction and on-going employment opportunities);
- increasing the equine-related training and research opportunities available in the local area;
- investing in diagnostic equipment and infrastructure to draw horses and horse people to the area and enhance Scone's reputation as the Horse Capital; and
- expanding and increasing our support of local horse organizations and events.

However, our future is tied inextricably with the future of the Hunter Valley's thoroughbred breeding industry. 90% of our business depends on the Thoroughbred industry. If the Thoroughbred industry does not exist in the Upper Hunter, our practice does not exist.

For some years now our investment plans have been on hold as the future of the Hunter's thoroughbred breeding industry remains uncertain. Decades of bad planning decisions and the issuance of explorations licences for individual mining projects that have the potential to devastate an entire industry have forced us to put on hold our investment in the region. This uncertainty is having a negative effect on investment and the future of our industry.

The Hunter Valley's thoroughbred breeding industry, its critical mass and the benefits that flow from it, including to the network of support industries like our own, cannot be replicated or relocated as a whole. Mining and Gas extraction are relatively short term activities, they take the resources and move on. The Thoroughbred industry has been a sustainable land use for nearly 200 years and counting.

The Scone Equine Hospital firmly believes that the Hunter Valley's horse industry is a major, sustainable contributor to the economy and the amenity of the area. The Hunter Valley is recognised as the "Horse Capital" of Australia – a brand that has been developed on a clean and green image which in turn attracts investment, industry, tourism and residents to the area.

The cumulative effects of mining and resource extraction in the rest of the Hunter have pushed the area to a tipping point which if allowed to further expand will destroy the Thoroughbred industry here and cause the area to lose its international identity and reputation.

## The Mount Pleasant Proposal

The Scone Equine Hospital has serious concerns about, and is opposed to, the Mount Pleasant modification proposal.

## Incompatible Land Uses

*"The thoroughbred industry in the Upper Hunter Valley is a very significant contributor to the regional, state and national economies and a major source of employment. The structure of the industry makes it particularly vulnerable to threats based on image and the introduction of coal mining in the Upper Hunter Valley is strongly identified as such a threat. The available evidence supports the view that open-cut coal mining and a viable international scale thoroughbred breeding enterprise are incompatible land uses."*

The Scone Equine Hospital acknowledges and supports the conclusions of the Bickham Planning Assessment Commission relating to the vulnerability of the equine industry to

threats based on image (including reputation and visual amenity) and the incompatibility of open cut coal mines and viable international scale thoroughbred breeding enterprises.

We also acknowledge and support the findings of four previous PACs which also concluded that:

- mining and thoroughbred breeding enterprises cannot co-exist in close proximity; and
- the Hunter's thoroughbred breeding industry should be protected through the establishment of appropriate buffers, exclusion zones or preservation measures.

For the Department's reference the Hunter Valley's Equine Industry Cluster is only Centre of Thoroughbred Breeding Excellence in the world that is not protected by its Government. Both the Kentucky USA and Newmarket UK equine clusters are recognised and protected from the incursion of incompatible land use.

The proposed Mount Pleasant operation received consent in 1999 but has not commence any mining operations on site to this day. Given the age of the original mining proposal and underpinning assessments, it is reasonable to expect that a new application and/or a new and full set of environmental impact assessments reflecting today's government policies, environmental standards and planning guidelines would be required.

This proposed mine is close proximity thoroughbred breeding studs and broodmare farms in the Upper Hunter and is creeping closer to local townships and rural residences. It is inconceivable that any reasonable modern day assessment of the full impact of this mining project would not be required by the Department and undertaken by the new owner and Proponent

#### *Air Quality and Human Health Effects*

The Scone Equine Hospital recognises that the science regarding the environmental and human health effects of coal mining and coal seam gas extraction is currently inadequate. The Mount Pleasant modification proposal does not properly address the cumulative impacts (both air quality and health effects) of mining in the region.

Research conducted by the University of Sydney has raised serious concerns on the human health effects and social impacts of coal mining on communities – issues that are particularly relevant to communities in the Hunter Valley. As the University of Sydney research notes the Hunter Valley has more than 30 mostly open cut coal mines and six active coal-fired power stations. The University of Sydney's international, peer reviewed, research has highlighted the serious health impacts for communities living near coal mines and coal combusting power stations.

Human health problems identified by this research include children and infants with impaired growth, neurological development, high blood levels of heavy metals, higher prevalences of birth defects, greater chance of low birth weight which is also a risk factor for future obesity, diabetes and heart disease. Adults have shown to have higher rates of death from lung cancer and chronic heart, respiratory and kidney disease. There are also changes of developing other cancers and hypertension. Some studies have also shown higher rates of miscarriages and stillbirths.

This research reveals highly alarming results, results that should be seriously tested through a human health study in the Hunter Valley. There is a duty of care that this Government has on the Hunter Valley communities and the research conducted by the Sydney University cannot and should not be ignored.

More recent health impact reports support these findings. It is of serious concern therefore that this modification starts with the premise of exceedances in air quality, exacerbating conditions already prevalent in the Upper Hunter and placing at risk the health and wellbeing of the Hunter community.

#### Other Environmental Impacts

We note with concern the environmental impacts outlined through preliminary analysis in the Hunter Thoroughbred Breeders Association submission – particularly those relating to water and noise impacts, visual amenity and reputational impacts to the thoroughbred industry, and irreversible risks to the Upper Hunter's cultural heritage and landscape.

The fact that these risks are not acceptable has been established by at least 5 PACs (including the Bickham PAC in 2010 and 4 separate PACs on the Drayton South proposal).

#### Conclusion

It is with extreme concern and frustration that there is no certainty or protection for the thoroughbred industry in the Upper Hunter and operations like ours so that we can invest, grow and prosper with confidence.

It is also concerning that the Department would allow the assessment of a modification to an out-dated mine plan which is some 20 years old, without the need for either a new application or a full environmental impact assessment.

We trust that you will hear our concern and either reject the modification or require the Proponent to submit a full environmental impact assessment so that it can be properly and fulsomely assessed.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'A. Adkins', written on a light yellow rectangular background.

Dr Angus Adkins  
Director  
Scone Equine Hospital