

Ms Carolyn McNally  
Secretary  
NSW Department of Planning and Infrastructure  
GPO Box 39  
Sydney NSW 2001



2 February 2018

## **MOUNT PLEASANT COAL MINE - MODIFICATION 4 RAIL INFRASTRUCTURE**

The Hunter Thoroughbred Breeders Association (HTBA) represents over 150 industry participants including thoroughbred breeders and suppliers of equine support services. The Hunter Valley's Thoroughbred Breeding Industry is Australia's premier multi-billion dollar breeding industry, representing over half of all thoroughbreds produced in Australia. It is Australia's largest producer, supplier and exporter of premium thoroughbreds and acknowledged as one of only three international centres of thoroughbred breeding excellence in the world. It is an important employer of hundreds of thousands Australians (directly and indirectly) throughout our value chain regionally, in NSW and across the nation.

The HTBA notes that this modification has been on exhibition for a 2 week period during the Australian summer holidays. In our view, it is unreasonable and totally unacceptable to expect rural communities to digest and obtain considered advice on mine plan modifications of this significance given the substantial potential impacts on the surrounding community, agricultural landholders and the environment – particularly the Upper Hunter's increasingly compromised air quality. In releasing this Modification Environmental Assessment in the Australian summer holiday period and then providing only a 2 week exhibition period, the Department of Planning does itself, and all affected communities and landholders, a serious disservice.

HTBA objects to the Mount Pleasant modification 4 proposal. This modification is an integral part of Mount Pleasant Modification 3. As such the environmental impacts should be assessed as one process rather than imposing unnecessary confusion, work and expense on rural landholders and communities through multiple processes.

Given the very short exhibition period and the significant implications and impacts of the modifications proposed to the Mount Pleasant mine, we have not had an opportunity to fully evaluate this modification. We reserve the right to lodge a supplementary submission on this matter should that be necessary. Our opposition however stands on the basis of the integral nature of this modification to Mount Pleasant Modification No 3 and the significant community, industry and environmental impacts caused by any modification to the Mount Pleasant Development Authority as outlined in our submission of July 2017.

### **The Thoroughbred Breeding Industry**

The Hunter Valley's Thoroughbred Breeding Industry is 1 of only 3 Thoroughbred Breeding Centres of Excellence in the world alongside Kentucky in the USA and Newmarket in the UK. This in itself is an important fact attesting to the international and national significance of the industry.

The industry is vertically integrated, interdependent and concentrated in a critical mass in the Upper Hunter Valley. It contributes over \$5billion to the national GDP and \$2.6 billion to NSW economy every year. It is a significant regional, state and national industry and employer and the largest agricultural industry and employer in the Hunter Valley<sup>1</sup>.

The impacts of this proposed mine (direct and indirect, static and dynamic) will impact the nearby towns of Muswellbrook and Aberdeen, the local landscape and topography, adding to the cumulative impacts of mining in this area, including its environment, character and reputation.

<sup>1</sup> See also IER 2014 Report *Size and Scope of the NSW Racing Industry*, commissioned by the NSW Government  
[http://www.olgr.nsw.gov.au/pdfs/racing/NSWRacingStudy\\_lowres.pdf](http://www.olgr.nsw.gov.au/pdfs/racing/NSWRacingStudy_lowres.pdf)



The global thoroughbred breeding industry is extremely competitive and investment is highly mobile. Reputation and brand are paramount to attracting investment and retaining clients. This is reflected in every aspect of a world scale stud's appearance and operation – from the approaches, surrounds, locality and throughout every acre of the stud's operation.

The production of elite equine athletes requires a unique operating environment combining scenic landscape, plentiful clean water, rich soils and a varied undulating terrain to produce and develop young equine athletes into the champions of the future.

Many studs and broodmare farms, including Godolphin's Kelvinside stud farm, are located in the Upper Hunter Valley, including the Segenhoe Valley, where all of the above characteristics are present. Any threat to this environment (perceived or real) will threaten the fundamental basis of the business model upon which this industry is based.

Five (5) previous PACs have recognised the vulnerability of the industry to the threat of mining<sup>2</sup> with a recent PAC<sup>3</sup> recommending appropriate protections be put in place to safeguard our important industry (including through appropriate buffers, exclusion zones or preservation orders).

### Mount Pleasant Modification

The HTBA objected to the Mount Pleasant modification (3) proposal given the potential and significant impacts on:

1. the Upper Hunter's water systems which are the lifeblood of the Upper Hunter's agricultural industries, including the equine industry;
2. the reputation, operation and future of the Upper Hunter's equine critical industry cluster – particularly those operations that are located in the vicinity including those that are the gateway to the critical cluster operations in the Segenhoe Valley;
3. air, noise, dust and other mining impacts in the Upper Hunter and the lack of appropriate cumulative environmental and mining assessments undertaken with respect to this proposal;
4. air and noise exceedances, conceded by the Proponent, and the impacts of those exceedances on the town of Muswellbrook and the health and wellbeing of the local community;
5. the serious and irreversible impacts on Aboriginal and non-Aboriginal heritage associated with this mining application;
6. Strategic Agricultural lands (including biophysical strategic agricultural land "BSAL") and the equine and wine critical industry clusters
7. visual amenity for the local community, particularly given its close proximity to the town of Muswellbrook, for the equine and wine critical industry clusters and tourism (both current and future).

As Mount Pleasant Rail Infrastructure Modification 4 is an integral part of the Mount Pleasant operations and Modification 3, our opposition remains.

A copy of our submission to Mount Pleasant Modification 3 is appended.

Yours sincerely



Cameron Collins  
President

<sup>2</sup> Bickham Coal Project, Review PAC (2010); Drayton South Review PAC (2013); Drayton South Determination PAC (2014); Drayton South Review PAC (2016); Drayton South Determination PAC (2017).

<sup>3</sup> Drayton South Review PAC (2016).

