



Ms Carolyn McNally
Secretary
NSW Department of Planning and Infrastructure
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25 July 2018

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**GODOLPHIN AUSTRALIA SUBMISSION
DARTBROOK MODIFICATION 7- ENVIRONMENTAL ASSESSMENT.**

Dear Ms McNally,

Godolphin Australia Pty Ltd supports the submission lodged by the Hunter Thoroughbred Breeders and opposes the Dartbrook Modification 7.

Godolphin

Godolphin is HH Sheikh Mohammed bin Rashid Al Maktoum's global breeding business which operates in six countries around the world, including Australia's Hunter Valley, Newmarket in the UK, County Kildare in Ireland, Kentucky USA and Hokkaido, Japan. HH Sheikh Mohammed is ruler of Dubai and Vice President of the United Arab Emirates.

Godolphin established its commercial breeding operation in the Hunter Valley in 2001 (trading under the Darley Australia name) in recognition of Australia's growing force in international thoroughbred breeding and racing.

In 2003 we purchased the 1,700-acre Kelvinside Stud in Aberdeen in the Hunter Valley. The property has since been developed into a world-class facility with capacity to stand 17 stallions, comprehensive mare, racehorse spelling and rehabilitation and yearling facilities and a world class education and training operation.

In 2008 we also purchased Australia's largest integrated breeding and racing operation, Ingham Bloodstock, which included the 6,500-acre Woodlands Stud at Denman. In addition to its Hunter Valley farms Godolphin operates a Victorian breeding operation from its stud Northwood Park, at Seymour Victoria.

Our Kelvinside and Woodlands properties operate as one integrated operation in the Hunter Valley.

Godolphin also owns in excess of 1,000 horses with over 400 horses in training or racing from its two training bases in Western Sydney, and a Victorian training base at Flemington racecourse in Melbourne, Victoria. It is estimated that Godolphin's ownership of elite thoroughbred racehorses amounts to some 10 per cent of all racehorses competing in metropolitan Sydney.

Godolphin employs some 360 people in Australia, including up to 150 in the Hunter Valley across its two stud farms. These include horse handlers, bloodstock experts, gardeners, and others working in corporate functions including administration, finance, human resources, IT, and marketing and sales. Godolphin hosts over 4,000 clients and visitors annually to our stud farms at Kelvinside and Woodlands.

During the Southern Hemisphere breeding season the value of bloodstock under Godolphin's stewardship is in the order of \$250 million, with in excess of \$200 million located in the Hunter Valley.

The Kelvinside property has a rich and continuous pastoral history since the 1800's. It was carved from the Segenhoe Estate in the late 1800's by John King Fleming who named it Kelvinside after a property in Scotland. The Kelvinside homestead was built in 1898, is one of the iconic historic homesteads of the district and is a classic example of Australian colonial architecture. The building is set on high ground with views of the Hunter and Pages rivers.

Dartbrook Modification 7

The Dartbrook underground mine has been in care and maintenance since 2006 – some 12 years. The previous owner of the Dartbrook underground mine (Anglo American) sold the mine to Australian Pacific Coal in May 2017 for some \$25 million and the sale was completed with a vendor loan from Anglo American of over \$7 million.

It is of serious concern that the Environmental Assessment accompanying this modification:

1. does not contain a social impact assessment – contrary to the NSW Department of Planning requirement:
 - a. which was published by the Department of Planning in September 2017 and is *"intended to provide a clear, consistent and rigorous framework for identifying, predicting, evaluating and responding to the social impacts of State significant resource project as part of the overall environmental impact assessment process"* and *"support informed decision making by strengthening the quality and relevance of information and analysis provided to the consent authority."*
2. does not adequately assess all the costs associated with the Modification proposal – including the mine's capital and operating costs, environmental costs associated with significant numbers of truck haulage (192 movements per day, 5 days a week) and externality costs. This is a significant inadequacy which underestimates the costs of the Modification and biases the economic analysis in favour of the

Project;

3. provides inadequate information on the risks associated with the mine, production and operating plan, understates the Project's capital costs (at \$15m compared to \$162 estimated by the HTBA expert and \$258m as assessed in the Proponent's 2017 JORC report), presents unsupported assumptions about the coal price, fails to address the need for stockpiles and assess their environmental impacts and assumes productivity levels that are "aggressive and difficult to maintain on a regular basis";
4. fails to properly assess the ground and surface water and flood impacts of the Modification and is non-compliant with the NSW Government's Aquifer Interference Policy and the Water Management Act 2000;
5. will result in air quality exceedances and lacks any consideration and assessment of cumulative air quality impacts;
6. will result in exceedances of project noise limits;
7. provides no assessment of historical heritage and no conflicting analyses of Aboriginal heritage assessments which suggests that these assessments are incorrect;
8. will result in unacceptable visual impacts on nearby residences (which have been underestimated and omitted from serious analysis), the surrounding landscape, nearby rural town of Aberdeen and for travelers and tourists to the region.

We agree with the HTBA's position that, as the Proponent does not intend to clean the coal, there is no use, and should be no option, for a washery now or in the future. This is consistent with the fact that the Proponent has not included any environmental assessment of disturbed land, which has been rehabilitated by the former owner, Anglo American, at the Department's request.

In conclusion, this Modification proposal lacks appropriate environmental and socio-economic assessment. The significant increase in truck haulage movements will create an indelible mark on the landscape, negatively impact the environment, increase congestion and risk public safety.

Independent assessments of both the mine and mine operating plans, by both HTBA and the Proponent's own consultants, verify that this underground mine proposal will return a negative NPV and is not justified as a stand alone project. By the Proponent's own admission, this modification is a pre-cursor to a further application for an open cut coal mine.

On these grounds there is no justification for the Modification to proceed and the Department should recommend against it.

Yours sincerely



Ross Cole.