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The Secretary  
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## **MOUNT PLEASANT OPTIMISATION PROJECT ENVIRONMENTAL IMPACT ASSESSMENT**

Godolphin Australia Pty Ltd ("Godolphin") is the largest integrated breeding and racing operation in Australia.

We object to the Mount Pleasant Optimisation Project.

### **Godolphin**

Godolphin is part of a global breeding business, which operates around the world, including Australia's Hunter Valley, Newmarket in the UK, County Kildare in Ireland, Kentucky USA, Hokkaido, Japan and the United Arab Emirates.

Largest Australian Breeding and Racing Operation.

In Australia, Godolphin employs in the region of 300 people (over 150 in the Hunter Valley) and has 6 main operational sites (3 stud farms and 3 training facilities):

- NSW: 2 farms (Woodlands and Kelvinside in the Hunter Valley) and 2 training facilities (Warwick Farm & Agnes Banks);
- Victoria: 1 farm (Northwood Park) and 1 training facility (Flemington).

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 then largest integrated breeding and racing operation, Ingham Bloodstock, which included the 6,000-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, where it stood 7 Stallions for the 2020 Season.

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

Godolphin owns in excess of 800 horses with over 300 horses in training or racing from its two training bases in Warwick Farm and Agnes Banks (Western Sydney), and a Victorian training base at Flemington racecourse in Melbourne, Victoria.

Godolphin's business model is to "breed to race and race to breed". All of its progeny are bred from the finest thoroughbred bloodlines, building their reputation and credentials on the racetrack, and retired to stud to produce future elite athletes of the turf.

Godolphin employs some 150 employees 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, in normal circumstances, over 4,000 clients and visitors annually to our stud farms at Kelvinside and Woodlands.

It is important to understand that stallion farms are at the heart of the thoroughbred breeding business model. The stallion farms attract and support broodmare farms and other equine support industries, which ultimately form the equine critical industry cluster.

The Kelvinside Stud farm, which houses our premier stallion bloodstock, is a principal reason why thoroughbred clients and investors are attracted to the Hunter Valley and why over 100 broodmare farms and many more equine support industries are co-located in the Hunter.

Our Kelvinside Stud is the closest stud to the proposed Mount Pleasant Optimisation project.

It is our shop front, our client interface. It is where we showcase our operations and our stallions, and where our clients bring their broodmares for cover by our Stallions.

Aberdeen and its surrounds are home to many of our staff and their families. It is where we host thousands of clients, visitors, racing fans and tourists.

Our business relies on a pristine environment, which is clearly visible to our clients, visitor and tourists.

Open cut coal mining is highly visually, physically and environmentally intrusive and completely contrary to every message we send to our clients.

Open cut coal mining and international scale thoroughbred breeding are fundamentally incompatible land uses that cannot coexist in close (including visually close) proximity.

## Mount Pleasant Optimisation Project

MACH Energy's Environmental Assessment is deficient and either does not adequately assess or does not address many of the impacts of the proposed development, including the potential project specific and cumulative impacts on the nearby towns, communities, and the equine industry cluster.

We concur and support the submission lodged by the Hunter Thoroughbred Breeders Association. We particularly concur with the need for a full cumulative impact assessment to be undertaken on the Upper Hunter's air quality and water security impacted by this and other mining operations and proposals in the Upper Hunter as a matter of urgency.

In particular, we submit the following:

- The Mount Pleasant Optimisation Environmental Impact Statement (EIS) displays similar shortcomings to the economic analysis of this project, which are biased in favour of this project. These shortcomings (underestimating or ignoring the costs and over-estimating the benefits) are becoming all too familiar with mining proponent's economic analyses in the Hunter.
- Air quality, dust and associated pollution has significantly worsened in the Upper Hunter since the commencement of the Mount Pleasant operations. It is an unsustainable situation that this rural area has the most polluted postcodes in NSW.
- The Mount Pleasant Optimisation project, with a doubling of production over a further 22 years, will exacerbate this situation, resulting in greater levels of exceedances imposing greater health risks to residents, landholders, and livestock.
- This situation is further aggravated by air quality data sets presented by the Proponent on a project alone basis, based on flawed background air quality parameters and demonstrating no consideration or assessment of the cumulative air quality impacts of this project in addition to currently operating mines and future mining proposals – contrary to NSW Government guidelines and the Secretary's Environmental Assessment Requirements.
- It is of significant concern that this proposal will emit between 4,000 to 7,000 tonnes Total Suspended Particles each year for the life of this mine. This in addition to some 12,000 tonnes of TSP emitted annually by each of the surrounding mines. We contend that this is not a fair, reasonable, or safe sharing of the Upper Hunter's air shed.
- Water is the lifeblood of our industry and our operations. MACH Energy's surface and groundwater assessment is completely deficient, and in some cases (such as Mine Water Dams, Fines Emplacement Area and Tailings Dams) entirely fails to assess their impacts on the Hunter's vulnerable water systems.
- Further we note potentially significant dewatering drawdowns resulting from this proposal (in excess of 100meters) with cumulative predicted drawdowns potentially exceeding 200 meters. For surrounding landholders, water users, and the community this is completely unacceptable.

- Given the critical importance of water security to our region's sustainability it is critical that a cumulative assessment of mining impacts (current and proposed) on the Upper Hunter's water resources is conducted prior to the approval or commencement of any further mining.
- The Mount Pleasant Optimisation project will fundamentally alter the character and landscape of the Upper Hunter. This is the first mine that is advancing to the north and profoundly altering the landscape of rural towns and hitherto scenic areas previously undisturbed and unaffected by coal mining. The viewpoints assessed, in particular from the Aberdeen area are either completely inadequate or ignored, heightening the inadequacy of the assessment. Even so, the fundamental nature of the impact and alteration to the landscape is confronting, irreversible and unacceptable.
- The Proponent has ignored the visual and environmental impacts on the Kelvinside stud due to increased mining activity, blast plumes, dust deposition, noise and blasting, sulphur smells, vibration, night lighting and increased mining traffic in the area.
- Given the above and noting the total lack of a cumulative impact assessment, we submit that the Department must insist on cumulative impact assessments be undertaken to ensure appropriately informed findings are made on the merits of the proposal.
- It is clear that mapped equine critical industry cluster land is both within the project boundary, abuts the project boundary and is in close proximity to the proposed Mount Pleasant Optimisation project. However, MACH Energy has not undertaken any serious assessment of the impacts of its proposal on the ECIC which is earmarked for heightened protection by the NSW Government.
- It is our strongly held view that this proposal does not align with the principles of Ecologically Sustainable Development, would not promote social and economic welfare of the community and a better environment as articulated by the Objects of the E&A Act, presents unacceptable environmental and visual impacts, will fundamentally and permanently alter the landscape and character of the Upper Hunter and is against the public interest. It should be refused.

Yours sincerely



**Ross Cole**

Director of Corporate Services