

Key Issues Report and Response to Submissions

PROPOSED NEW STABLES COMPLEX - NEWCASTLE JOCKEY CLUB

125 CHATHAM STREET, BROADMEADOW NSW 2292
(LOT 13 - 14 DP227704 AND LOT 82 DP1138209)



EJE Architecture

CLIENT: NEWCASTLE JOCKEY CLUB C/- AVID PROJECT MANAGEMENT

DATE: 13 May 2022

PREPARED BY:



ABN 23 104 067 405

7 Canberra Street Charlestown NSW 2290 | PO Box 850 Charlestown NSW 2290

87 Herbert Street Gulgong NSW 2852 | PO Box 232 Gulgong NSW 2852

02 4942 5441 | 02 6374 2911



CONTENTS


1.	INTRODUCTION	1
1.1.	PROJECT DESCRIPTION.....	1
1.2.	PROJECT OVERVIEW.....	2
2.	REQUEST FOR INFORMATION.....	7
2.1.	ARCHITECTURAL AND LANDSCAPE DRAWINGS	7
2.1.1.	ITEMS MARKED FOR RELOCATION.....	7
2.1.2.	ELEVATIONS	7
2.1.3.	MATERIALS.....	7
2.1.4.	RECOMMENDED ACOUSTIC TREATMENTS	7
2.1.5.	ARCHITECTURAL AND LANDSCAPE DRAWING INCONSISTENCIES	8
2.1.6.	LANDSCAPING.....	8
2.2.	AMENITY, BUILT FORM, VISUAL AND STREETSCAPE MATTERS	8
2.3.	CONTAMINATION.....	8
2.4.	FLOODING	9
2.5.	STORMWATER AND WASTEWATER MANAGEMENT	9
2.6.	TRAFFIC, PARKING AND ACCESS	9
2.7.	WASTE AND PEST MANAGEMENT	9
2.8.	NOISE IMPACT ASSESSMENT	10
2.9.	ECOLOGICALLY SUSTAINABLE DEVELOPMENT (ESD).....	10
2.10.	HERITAGE	10
2.11.	SIGNAGE TOWER AND ENTRY TOWER.....	10
2.12.	BUILDING CODE OF AUSTRALIA (BCA)	11
2.13.	GENERAL MATTERS.....	11
2.13.1.	STAGING.....	11
2.13.2.	HOURS OF OPERATION AND STAFFING NUMBERS	11
2.13.3.	UPDATES TO DOCUMENTATION	11
3.	ACTIONS TAKEN DURING AND AFTER EIS EXHIBITION	13
3.1.	ADDITIONAL ENVIRONMENTAL ASSESSMENT	13
3.2.	CONSULTATION ENGAGEMENT ACTIVITIES	13
3.2.1.	USER GROUPS	13
3.2.2.	SCHOOL INFRASTRUCTURE NSW	13
3.2.3.	CITY OF NEWCASTLE	13
4.	RESPONSE TO SUBMISSIONS.....	14
4.1.	AGENCY SUBMISSIONS	14
4.2.	RESPONSE TO SUBMISSIONS BY TOPIC	35
5.	EVALUATION AND CONCLUSION.....	55

APPENDICES

Appendix 1:	Architectural Plans prepared by EJE Architects – Revised
Appendix 2:	Streetscape Renders prepared by Moir Landscape Architects – Revised
Appendix 3:	Landscape Drawings prepared by Moir Landscape Architects – Revised
Appendix 4:	Preliminary and Detailed Contamination Assessment prepared by Qualtest – Revised
Appendix 5:	Stormwater Management Report prepared by MPC – Revised
Appendix 6:	Stormwater Plans prepared by MPC – Revised
Appendix 7:	Operational and Waste Management Plan prepared by NJC – Revised
Appendix 8:	Traffic and Parking Assessment prepared by SECA Solution – Revised
Appendix 9:	Turning Path Plans prepared by MPC – Revised
Appendix 10:	BCA Compliance Statement prepared by NewCert
Appendix 11:	Noise Impact Assessment prepared by Reverb Acoustics – Revised
Appendix 12:	Air Quality and Odour Risk Assessment prepared by Northstar Air Quality – Revised
Appendix 13:	Preliminary Construction Management Plan prepared by Avid Project Management – Revised
Appendix 14:	Statement of Heritage Impact prepared by EJE Heritage – Revised

This document is issued to Newcastle Jockey Club c/- Avid Project Management for the purpose of supporting a development application for state significant development. It should not be used for any other purpose. The report must not be reproduced in whole or in part except with the prior consent of de Witt Consulting and subject to inclusion of an acknowledgement of the source. No information as to the contents or subject matter of this document or any part thereof may be communicated in any manner to any third party without the prior consent of de Witt Consulting.

Whilst reasonable attempts have been made to ensure that the contents of this report are accurate and complete at the time of writing, de Witt Consulting disclaims any responsibility for loss or damage that may be occasioned directly or indirectly through the use of, or reliance on, the contents of this report.

PREPARED BY:	REVIEWED BY:	RELEASED BY:
Name: Samara Jayne Position: Town Planner	Name: Emma Mason Position: Principal Town Planner	Name: Emma Mason Position: Principal Town Planner  Signed: Date: 13/05/22

Copyright: The concepts and information contained in this document are the property of de Witt Consulting. Use or copying of this document in whole or part without the written permission of de Witt Consulting constitutes an infringement of copyright

1. INTRODUCTION

This Key Issues Report and Response to Submissions has been prepared for Newcastle Jockey Club (NJC) c/- Avid Project Management regarding a development application (DA) for a new horse stables complex. As part of this application (SSD-12982045), exhibition occurred from 19 October to 15 November 2021 with the public and relevant agencies invited to provide submissions in response.

31 submissions were received from the public, organisations and various agencies. This included:

- Watch this space promotions
- Australian Blood stock
- Racing NSW
- Doyle Racing
- Lees Racing Pty Ltd
- City of Newcastle Council (CN)
- School Infrastructure NSW (SISNW)
- Public submissions
- Other agencies

In addition, the Department of Planning and Environment (the Department) issued a request for information (RFI) dated 26 November 2021 outlining key matters to be addressed.

The project team has reviewed these submissions as well as the Department's RFI and responded to each item raised. This report provides a written response to the issues raised in the submissions, as required under Section 59 of the Environmental Planning and Assessment Regulation 2021, as well as the RFI.

Note that this report should be read as an addendum to the Environmental Impact Statement (EIS).

1.1. Project Description

The proposal is to construct new stables and associated structures to further support the highly successful Newcastle and Hunter Valley thoroughbred racing industry. The project objectives are to provide on-site stabling, improve training facilities, significantly reduce vehicle movements associated with the transportation of horses to and from NJC from onsite and offsite stables, meet best practice standards for thoroughbred stabling and training, improve environmental and waste management measures and explore sustainable solar and water reuse opportunities at the site.

The proposed development will be located on the south-western corner of the site at the corner of Darling and Chatham Streets, which currently comprises a small number of structures including an equine pool and the former race day tie-up stalls.

The following works will be required to facilitate the proposal:

- Demolition works to accommodate new works
- Services and utilities installation
- Earthworks
- Erosion and sediment control measures
- Tree removal or protection
- Reactivation of existing driveway off Chatham Street
- Signage
- Landscaping and fencing.

The proposed stables complex comprises of seven two storey stable blocks, horse walkers, goods storage, loading zones, equipment shed, parking, stormwater management measures, landscaping, and utilities as described in the EIS.

1.2. Project Overview

Table 1 provides a summary of the key components of the original proposal, including the amendments made since exhibition of the EIS.

Table 1 Summary of Key Aspects of Project		
Aspect	Description – as exhibited	Description – as amended
Project Summary	New stables and associated structures to support the Newcastle and Hunter Valley thoroughbred racing industry. Provide accommodation for up to 520 horses, improve training facilities, significantly reduce vehicle movements associated with the transportation of horses to and from NJC from onsite and offsite stables, meet best practice standards for thoroughbred stabling and training, improve environmental and waste management measures and explore sustainable solar and water reuse opportunities at the site.	<p>The capacity for horses has been reduced to 480, down from 520.</p> <p>Horse walkers repositioned for improved access from stables.</p> <p>Tie-up area introduced for morning trackwork & barrier trials.</p> <p>Proposed trainer's facility overlooking the track.</p> <p>Increased carparking and addressed displacement of race day parking.</p>
Site Preparation	<ul style="list-style-type: none"> Removal of 12 trees as well as shrubs and ground covers Demolition of: <ul style="list-style-type: none"> Existing masonry block and timber race day tie-up stalls Warm up ring Existing equine pool and associated structures Grounds maintenance workshop Machinery sheds adjacent Chatham Street Driveways, hardstand, pathways and fencing Entry feature structure / gates to race day facilities Existing signage at the corner of Chatham and Darling Streets Civil works 	<p>Removal of four additional trees (16 total) as well as shrubs and ground covers.</p> <p>No additional demolition proposed.</p> <p>Civil works footprint extended to include relocated horse walkers (in particular 'B' and 'B2') and additional parking.</p>
Built Form	<p><u>Stables</u></p> <p>Each level of Blocks A – G accommodates 40 stalls, wash bays, staff amenities, office, feed store, general storage / tack and laundry (Block D has stalls and associated facilities at the upper level only). The Blocks are connected by central concourses and separated by landscaped courtyards to improve shading, amenity and ventilation between buildings. The stalls have been designed in accordance with industry best practice for the welfare of the animals and the occupational health and safety of staff.</p> <p><u>Equine Pool, Horse Walkers, Sand Roll and Wash Bays</u></p> <p>Facilities include the indoor equine pool and 13 x 10-horse walkers. The equine pool is located at the ground floor of Block D. Nine horse walkers are located south of the track and four are located east of the goods shed and equipment shed. The horse walkers</p>	<p>Block A has been relocated. The original location has been replaced with tie-up stalls for 98 horses, which will be used for morning trackwork and barrier trials, while waiting entry onto the track through the new marshalling area.</p> <p>Horse walkers A, A2, B, B2, C and C2 have been relocated next to Block B as a result of the relocation of Block A and the rearrangement of this area.</p>

Table 1 Summary of Key Aspects of Project

Aspect	Description – as exhibited	Description – as amended
	<p>are approximately 20.9m in diameter and are approximately 8.1m high.</p> <p>The sand roll and wash bays are associated with the care and maintenance of the horses and are provided in multiple locations throughout the site. Sand rolls are typically 5.4m x 5.425m. Wash bays are typically 7.425m x 5.425m.</p> <p><u>Goods Storage</u></p> <p>Its purpose is to store feed and bedding material upon delivery at site, as well as used bedding and horse waste prior to removal from the site. The feed and bedding will be transported in purpose-designed bins, held in the supplies store, and distributed to the stables. Used material is also transported from the stalls in the same purpose-designed bins, and held in the removal store prior to collection. The stock store is for other consumables.</p> <p>The goods storage shed is 47.5m x 12m (570m²).</p> <p><u>Maintenance Shed</u></p> <p>The maintenance shed is used for storing track maintenance equipment and supplies. Whilst not directly associated with the stables complex, the maintenance shed is essential to the upkeep of the racing and training facilities. The proposed maintenance shed replaces an existing maintenance shed in generally the same location. It includes dedicated store rooms for chemicals and tools as well as equipment. An office and amenities are available at ground floor for staff use. Additional amenities including showers, change room and lockers, are provided on the first floor.</p> <p>The maintenance shed is 25.36m x 20.9m (530m²).</p> <p><u>Site Office and Equipment Shed</u></p> <p>The site office will house staff involved with day-to-day administration of the stables complex.</p> <p>Tools and equipment required for the operation and maintenance of the stables complex will be stored within the equipment shed. This would include hoses, pressure cleaners, forklifts, a mobile sweeper and hand-held tools such as brooms, rakes etc. Roller doors provide access to the equipment shed. There are no other openings to the northern internal wall shared with the office, or eastern or western (external) facades.</p> <p>The site office has dimensions of 15m x 9m (135m²) and the equipment shed is 12m x 17.99m (216m²).</p> <p><u>Other Features</u></p> <p>A goods lift adjacent the equipment shed facilitates the movement of feed and bedding to the upper-level stalls.</p>	

Table 1 Summary of Key Aspects of Project

Aspect	Description – as exhibited	Description – as amended
	<p>An entry tower adjacent an existing building east of the development site as a replacement for the existing tower to be demolished. It provides pedestrian access from Darling Street to the public race day facilities.</p> <p>General waste is to be stored in a dedicated enclosure within the equine and goods drop off / pick up zone, near the Darling Street frontage. The location enables general waste bins to be easily transported to the street for collection.</p> <p>The existing track access will be retained in its current location. The track access is an essential element linking the stables with the training surface.</p>	
Landscaping	<p>Extensive landscaping is proposed throughout the proposed stables complex. The Landscape Plan proposes 123 new trees to be planted. Proposed species include Red Flowering Iron Bark, Crepe Myrtle, Brush Box, Little Gen Southern Magnolia, Capital Flowering Pear and Water Gum. Mass plantings of shrubs, grasses, ground covers and basin plants are proposed.</p> <p>Landscaping will substantially screen views to the site from residences on Chatham Street and Darling Street.</p>	<p>Landscaping has been extended around and within the additional parking area.</p> <p>Street trees are provided along the Chatham Street frontage</p>
Entry and Signage	<p>A signage tower is proposed at the corner of Chatham Street and Darling Street. The eastern, western and southern faces of the signage tower will promote NJC upcoming events. Each signage panel has an area of 2.5m x 3.2m (8m²). The signage tower has a height of 10.75m.</p>	<p>There are no changes to the signage tower on the corner of Chatham Street and Darling Street.</p> <p>Details of the proposed entry tower and signage are provided in the architectural plans and addressed in this correspondence.</p>
Utility Infrastructure	<p>The development will require electrical, sewer, water and communications services. Specialist services engineers have been appointed to consider these connections, and the relevant authorities have been consulted as required. All relevant utilities and services will be provided at the site preparation stage. Water, sewer, and an electrical substation will be provided to the development area.</p>	<p>The anticipated location for the electrical substation is shown on the architectural plans. This will be subject to approval by Ausgrid during the detailed design phase of the project.</p>
Site Area	48.33ha	No change
Uses	Horse stable complex	No change
Access	<p>The proposal seeks to reactivate an existing driveway off Chatham Street at the northern end of the proposed facility. The 12.020m wide driveway will be used exclusively for vehicles associated with track maintenance. The maintenance drop off / pick up zone has been designed to accommodate two-way movements, manoeuvring, and all turn movements into and out of the site.</p>	<p>There are no changes to the vehicle access arrangements for the proposed maintenance drop off - pick up zone or the equine and goods drop off – pick up zone.</p> <p>An existing driveway will be utilised on Darling Street to service the</p>

Table 1 Summary of Key Aspects of Project

Aspect	Description – as exhibited	Description – as amended
	<p>The existing main access from Chatham Street to the hardstand area and access to the previous tie-up stalls and the track crossing will be closed. The kerb shall be reinstated allowing for additional parking in this area.</p> <p>Delivery vehicles and horse floats will enter the site via a 12m wide, one-way (ingress only) driveway via Chatham Street (southern entrance) and exit the site via a one-way (egress only) driveway off Darling Street. Both driveways will allow for left and right turns and shall allow for the movement of heavy vehicles including semi-trailers associated with feed and bedding deliveries and waste removal.</p>	administration staff carpark and general staff carpark.
Car parking	<p>The proposal includes the formalisation of parking for 94 staff vehicles via a 6.2m wide replacement driveway on Darling Street. The parking area will incorporate landscaping, fencing and lighting. The driveway will allow for two-way movements into the site and all turn movements out of the site.</p>	<p>The number of staff car parking increased to 121 and 6 motorbike spaces.</p> <p>A new formalised carpark is provided in front of the administration building for 40 car spaces and 2 motorbike spaces.</p> <p>The extent of the Event Day taxi and bus zones are now shown and are in the same location as the existing scenario.</p>
Bicycle parking	<p>Bicycle parking facilities were to be investigated during the detailed design stage.</p>	<p>Bicycle parking is introduced throughout the site. In addition, each stable building features showers and toilet facilities which can be used as end of trip facilities.</p>
Hours of operation	<p>Hours of operation will be dictated by the horses' training schedule. Trackwork will occur 6 days a week (Monday to Saturday). The track will be open on the Public Holidays which do not fall on a Sunday. Trackwork will commence at 3:30am and will generally be complete by 8:30am. Following trackwork, a small number of staff will be on site to assist with general stable maintenance etc. A small number of stable hands will be on site on Sundays for feeding, mucking out stables etc.</p> <p>Deliveries of goods and materials to the site would generally commence between 9:00am to 9:30am and be completed by 5:00pm.</p>	<p>There is no change to the morning trackwork and general day time operations (3:30am to 5:00pm). The Operational Management Plan and this report clarifies that at all other hours (5:00pm – 3:30am) there may be occasional visits required by NJC staff, trainers, stablehands and vets, however this will be infrequent. There will be minimal activity during these hours, with all horses securely stabled and resting.</p>
Community use	<p>N/A – The proposed development is for private use.</p>	No change
Construction hours	<p>The normal hours of construction work will typically be in accordance with the conditions of consent issued by Council but are assumed to be 7:00am to 6:00pm,</p>	No change

Table 1 Summary of Key Aspects of Project

Aspect	Description – as exhibited	Description – as amended
	Monday to Friday, 7:00am to 1:00pm Saturdays and no work on Sundays or public holidays.	
CIV	More than \$30 million	No change

2. REQUEST FOR INFORMATION

On 26th November 2021, the Department of Planning and Environment issued a Request for Information. Below is the applicant's response to the issues raised in this Request.

2.1. Architectural and Landscape Drawings

2.1.1. Items Marked for Relocation

The existing trackwork supervisors hut is proposed to be relocated to the area north of the maintenance / drop off area.

It is anticipated that the booster assembly will need to be relocated to the area south of the new entry tower (this will be confirmed during the detailed design period).

Both items are indicated on the amended Architectural plans in **Appendix 1**.

The octagonal horse trough is proposed to be relocated from its current position at the centre of the now redundant Warm-Up Ring, to the centre of the recently constructed warm-up ring near Lowe Street. The Statement of Heritage Impact (**Appendix 14**) supports the relocation as it enables the horse trough to be retained in its practical context despite the new location. The proposed location is outside the development footprint (approximately 300 metres (m) east) and therefore is not shown on the plans. A condition of consent may be imposed requiring the trough relocation.

No other items are proposed for relocation.

2.1.2. Elevations

The elevations for the maintenance facility and horse walkers are provided in the amended Architectural plans (Sheet A28) (**Appendix 1**).

2.1.3. Materials

The material schedule is provided on Sheet A32 of the Architectural plans and described below:

- Main body walls, columns and feature walls: Various paint colour finishes to concrete / masonry substrate
- Trims: Powder-coated aluminium windows, door frames, & infill corrugated cladding, roofing fascias, gutter & downpipes finished in Dulux 'monument' or similar colour
- New Roofing: 'Trim-Dek' or similar sheet metal roofing
- Stable door and shutters: Vertical timber cladding, stained cedar or similar

The colour schedule is consistent with the original plans.

2.1.4. Recommended Acoustic Treatments

The recommended acoustic treatments are shown on the amended Architectural plans (**Appendix 1**). The treatments are indicated with the following notations:

- '2400 high 'Hebel' acoustic fence on ground level to acoustic engineer's details. Paint finish to match main wall body colour' shown adjacent the maintenance drop off – pick up zone
- '1200 high enclosed balustrade to curved ramp external edges to acoustic engineer's details (concrete walls – paint finish to match columns' show on the Darling Street side of Ramp 01 and the Chatham Street side of Ramp 02.

The 2400 high acoustic fence is also noted on Landscape plan Sheet LP07 in **Appendix 3**. The acoustic treatment to ramp balustrades are not shown on the Landscape plan as this is considered an architectural feature.

In addition to the above acoustic treatments, further noise control recommendations are identified in Section 4 of the Noise Impact Assessment (**Appendix 11**). The direct need for these measures will be determined at the detailed design stage when the noise emissions of specific plant and equipment is known. Therefore, it is not necessary to identify other acoustic treatments on the Architectural or

Landscape plans. Instead, compliance with the recommended acoustic treatments identified in the Noise Impact Assessment can be imposed as a condition of development consent.

2.1.5. Architectural and Landscape Drawing Inconsistencies

Coordination has occurred between the amended Architectural and Landscape plans to resolve any previous inconsistencies.

2.1.6. Landscaping

Substantial landscaping is proposed within the subject site to provide visual screening. Screening hedges and trees are proposed within the Chatham Street and Darling Street setbacks. In addition, screening hedges, trees and shrubs are proposed along the car park perimeter and along the eastern and northern extents of the building footprint.

The planting schedule on Landscape plan Sheet LP08 (**Appendix 3**) identifies the pot size and minimum height of trees and shrubs at planting. Pot sizes have been increased from the original Landscape plans submitted with the EIS.

Street trees are provided in accordance with City of Newcastle's (CN's) street tree requirements.

2.2. Amenity, Built Form, Visual and Streetscape Matters

New Streetscape Renders in **Appendix 2** show the proposed built form comparative to / in the context of, the surrounding residential development as much as practicable considering the separation provided by Chatham Street and Darling Street.

However, the even more substantial separation distance between the proposed development and the educational establishment makes properly conveying a visual comparison between them ineffective, as the only items opposite the site are playing courts with no structures in close proximity to the road reserve. To this end, streetscape renders showing the proposed built form comparative to the educational establishment are not provided.

The proposed electrical substation is shown on the amended architectural plans (**Appendix 1**), noting the final location is subject to Ausgrid approval. The position behind the street facing landscaping and fencing screens the substation from view. Once the final location is known it will be shown on the detailed landscape drawings at construction certificate stage.

Should it be determined as a requirement during the detailed design phase, the relocated booster assembly is shown south of the new entry tower on the amended Architectural plan Sheet A05 (**Appendix 1**) and Landscape plan Sheet LP05 (**Appendix 3**). The relocated booster assembly will be partially screened from view by the existing street tree *Callistemon viminalis*. Additional screening is not considered to be appropriate as it may impede access to the booster assembly in the event of an emergency.

The Landscape plans (both amended and original) show a mix of 1.2m high slat fencing and 2.1m high palisade fencing behind the signage tower and landscaping at the corner element. The use of lower height slat fencing on the boundary provides an appropriate level of territorial reinforcement in accordance with Crime Prevention through Environmental Design principals. The slat fencing also provides visual interest and articulation from the palisade fence proposed along the remaining boundary lengths. The higher palisade fence located behind the corner signage tower and landscaping is required for safety and security.

Fencing is depicted on the amended Architectural plans in **Appendix 1**, the Streetscape Renders in **Appendix 2** and the amended Landscape plans in **Appendix 3**.

2.3. Contamination

It is noted that State Environmental Planning Policy (SEPP) 55 – Remediation of Land referred to in the Request for Information has since been repealed and replaced with Chapter 4 of State Environmental Planning Policy (SEPP) (Resilience and Hazards) 2021. The SEPP primarily concerns consolidating former SEPP 55 – Remediation of Land, SEPP 33 – Hazardous and Offensive Development and SEPP

(Coastal Management) 2018. As this report is to be read as an addendum to the EIS, the consideration of the former SEPP 55 in the EIS requires no further amendments save reference to the new SEPP.

The Preliminary and Detailed Contamination Assessment (**Appendix 4**) has been updated and now addresses SEPP (Resilience and Hazards). Ultimately, based on the results of the Preliminary and Detailed Contamination Assessment, it is considered the site is suitable for the proposed redevelopment, from a contamination perspective, in accordance with SEPP (Resilience and Hazards).

2.4. Flooding

An amended Stormwater Management and Soil and Water Management Report (**Appendix 5**) has been prepared in response to CN's submission. Flooding is addressed within Sections 4.5 and 4.6 of the report. The response to CN's submission is discussed in further detail in Section 4.1 below.

2.5. Stormwater and Wastewater Management

An amended Stormwater Management and Soil and Water Management Report (**Appendix 5**) has been prepared in response to CN's submission. Stormwater and wastewater management measures are addressed in Sections 4.7-4.10 of the report and reflected in the amended Stormwater Management Plan (**Appendix 6**). The response to CN's submission is discussed in further detail in Section 4.1 below.

2.6. Traffic, Parking and Access

An amended Traffic and Parking Assessment (**Appendix 8**) has been prepared in response to points 5-8 of CN's submission. The response to CN's submission is discussed in further detail in Section 4.1 below.

The indicative staging relates to the construction phase only, as outlined in Section 2.13.1 of this report. All parking will be available at the operational phase of the development. In this regard, the matter is not required to be addressed in the amended Traffic and Parking Assessment.

Drainage modifications are proposed (**Appendix 5 and 6**) in order to accommodate the proposed new driveways on Chatham Street and Darling Street. As mentioned in CN's submission the impacts of driveways on CN's drainage infrastructure can be managed and resolved as part of an application under Section 138 of the *Roads Act 1993*. A condition of consent may be imposed to this effect.

2.7. Waste and Pest Management

Section 5 of the amended Operational and Waste Management Plan (OWMP) (**Appendix 7**) outlines the proposed management of flies and scavenging birds:

The regular mucking out of stables by stablehands and placement into lidded bins, and regular removal of lidded bins will reduce the opportunity for rodents and flies to be attracted to the facility. Precast concrete walls will not allow rodents to breed, as can be the case with cavity walls. Citronella control has been proven to be a successful deterrent to flies and mosquitos in other stables facilities, and can be implemented at this facility if necessary.

The post-DA detailed design of the facility shall ensure that roosting opportunities for birds are avoided, and where they cannot be avoided, control measures such as bird spikes or sonic bird control shall be introduced.

In addition – standard practices for pest control (as per Appendix Four) will be applied. An ongoing contract with a suitable pest control company (such as Advanced Pest Control) shall be implemented. The pest control company shall carry out a proactive pest control regime, visiting the facility to check and replace baits and control measures prior to any issues becoming identified, rather than being engaged on a reactive basis to remove pests after they have had a chance to establish within the facility. The pest control company shall provide NJC with a written report after each visit.

The amended OWMP states that should any neighbouring residences or organisations be affected by pests generated from the facility, the Complaints Handling Procedure in Section 8 of the OWMP shall be followed.

2.8. Noise Impact Assessment

The amended Noise Impact Assessment (**Appendix 11**) identifies that noise associated with site activities and equipment will generally be compliant with the criteria during all time periods at all nearby receivers, providing acoustic treatment detailed in Section 4 of the Assessment is implemented. Sleep arousal during the night period from 10:00pm-7:00am is not expected to be an issue, as the facility will be quiet during these times, with very little activity, except for the occasional attendance by vets/stable staff, etc.

2.9. Ecologically Sustainable Development (ESD)

This report reiterates the proponent's intention to incorporate a solar photovoltaic system into the development. No further details are required at the development application stage. The system will be documented at the detailed design stage.

2.10. Heritage

The amended Statement of Heritage (SoHI) (**Appendix 14**) considers the proposed Entry Tower works, noting:

The entry tower and gate structure proposed is similar to that which exists on the site already and references the ticket booths and turnstiles which existed in the 1940s being square in plan with a pointed pyramid roof. The proposed tower and gate will carry on the racegoers experience of entry to the venue into the future.

In relation to the proposed Entry Tower works, and the matters raised in CN's submission, the SoHI concludes:

The proposed works, despite their size, have been designed to minimise their impact upon the existing significant buildings by increasing setbacks, managing scale and proportion and using subdued colours. These efforts allow an increase of space around the significant buildings for interpreting their significance and appreciating their design, material and detail.

The proposed works have the potential to enhance the significance of the historic buildings and the Broadmeadow Racecourse Item by attracting better trainers, jockeys and horses, therefore creating better competition and enhancing the spectacle of race days. When approaching the site from the southwest, which is common, the proposed works have the potential to enhance the excitement of coming to the races thus having a corresponding enhancement to social significance.

Once inside the gates of the racecourse, and especially from within the grandstands, the proposed works will not diminish the focus of visitor to the site from the historic buildings or from the racetrack where the action is taking place.

The SoHI adequately addresses the Entry Tower works and CN's submission in relation to heritage impacts.

2.11. Signage Tower and Entry Tower

It is noted that State Environmental Planning Policy (SEPP) No.64 – Advertising and Signage referred to in the Request for Information has since been repealed and replaced with Chapter 3 of State Environmental Planning Policy (SEPP) (Industry and Employment) 2021. The assessment criteria are now listed in Chapter 5 of the SEPP.

Chapter 3 of the SEPP states a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:

- (a) that the signage is consistent with the objectives of this Policy as set out in section 3.1(1)(a), and
- (b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5 of the SEPP.

Schedule 5 requires an assessment of the signage in relation to specific criteria in relation to character of the area, special areas, views and vistas, streetscape, setting or landscape, site and building, associated devices and logos with advertisements and advertising structures, illumination and safety.

The proposed Entry Tower signage is 2.8m x 2.5m and has an area of 7m² (**Appendix 1**). The signage is consistent with the criteria in Schedule 5 of the SEPP. The signage has been designed to integrate with the facility and not dominate the views to the site. The scale and proportion are consistent with the characteristics of the site, having a height that is between the single storey built form elements and the stables blocks. The lower portion is of open construction to reduce the overall visual bulk, and the tower includes a pitched roof element to tie in with the proposed development at site. The proposed Entry Tower signage assists with wayfinding. The proposal is consistent with the SEPP.

There is no lighting, moving and or electronic components proposed.

2.12. Building Code of Australia (BCA)

A BCA Compliance Capability Statement has been prepared by NewCert (**Appendix 10**) which states that the proposal is capable of complying with the BCA requirements.

2.13. General Matters

2.13.1. Staging

The proposed staging is an indicative *construction* staging line only. It is the proponent's intent to construct the facility in 2 stages to ensure the existing training operations can remain active for as long as possible. The development will only become operational at the completion of Stage 2. Further clarification is provided in the updated Preliminary Construction Management Plan (**Appendix 13**).

2.13.2. Hours of Operation and Staffing Numbers

The hours of operation have been updated in the amended Traffic and Parking Assessment, OWMP and Noise Assessment. To summarise:

- Morning trackwork occurs between 3:30am and 8:30am
- General day time hours of operation are from 8:30am to 5:00pm
- From 5:00pm – 3:30am there may be occasional visits required by NJC staff, trainers, stablehands and vets, however this will be infrequent. There will be minimal activity during these hours, with all horses securely stabled and resting.

Staff numbers have been updated in Section 6 of the OWMP and amended Traffic and Parking Assessment. To summarise, the following staff numbers are anticipated:

- 107 strappers/stable hands, 35 jockeys, 10 trainers and 2 NJC track supervisors will be required for the morning trackwork
- 30 stablehands on duty during the general daytime hours
- There may be occasional visits required by NJC staff, trainers, stablehands and vets during the evening hours however this will be infrequent

The amended Noise Impact Assessment confirms that deliveries and pickup of horses is only permitted during the day and evening (7:00am-10:00pm). No delivery or pickup will be conducted at night (10:00pm-7:00am).

2.13.3. Updates to Documentation

The relevant documents have been updated to reflect the Department's Request for Information, CN's submission, and the issues raised in the agency and public submissions. Per Section 2 above, the following amended documents have been prepared:

- Architectural plans
- Streetscape Renders
- Landscape plans
- Preliminary and Detailed Contamination Report
- Stormwater Management and Soil and Water Management Report
- Stormwater Management Plans
- Civil and Turning Path Plans
- Operation and Waste Management Plan



- BCA Compliance Statement
- Noise Impact Assessment
- Air Quality and Odour Risk Assessment
- Preliminary Construction Management Plan
- Traffic and Parking Assessment
- Statement of Heritage Impact

In addition, the mitigation measures identified in the EIS have been amended to reflect the updated information.

3. ACTIONS TAKEN DURING AND AFTER EIS EXHIBITION

3.1. Additional Environmental Assessment

Following exhibition, a number of additional assessments / addendums to reports were carried out and are provided as appendices to this report.

3.2. Consultation Engagement Activities

3.2.1. User groups

On 14 December 2021 a workshop was held by the project manager (Avid Project Management), project architect (EJE), Newcastle Jockey Club staff and end user groups including trainers. The workshop provided an opportunity to review and discuss the feedback received during exhibition, discuss options to further mitigate impacts and ensure proposed changes meet the needs of the end users.

A number of changes resulted from the review of submissions and the workshop including:

- Provision of additional staff parking
- Reduction in the number of horses stabled on site from 520 to 480
- Provision of a dedicated tie-up and marshalling area close to the track entry and shielded by development from surrounding neighbours
- Improvements to functionality (for example, travel distances between stables and horse walkers was reduced by relocating Block A)

The changes are documented throughout this report and in the amended plans and reports in **Appendices 1-14**.

3.2.2. School Infrastructure NSW

A meeting with SINSW occurred on 16th March 2022. Matters discussed include the provision of a formalised footpath along the site's Chatham Road frontage to improve pedestrian safety and efficiency in proximity to the educational establishment. The footpath is now shown on the Architectural plans (**Appendix 1**). Clarification was provided by the project team that peak traffic movements associated with the proposed stables complex will not coincide with the school drop-off peak.

SINSW identified the need for a Construction Traffic Management Plan to be prepared in accordance with the Transport for NSW Traffic Control at Work Sites by the contractor as part of the construction certificate for the project. A Preliminary Traffic Construction Management Plan is appended to the Construction Management Plan (**Appendix 13**).

SINSW raised concern that the Noise Impact Assessment did not accurately reflect the location of administration buildings and classrooms and their relationship to the site. The Assessment was amended (**Appendix 11**) to accurately reflect the proximity of school buildings to the site.

Finally, SINSW requested the Air Quality Report to be amended to reflect the proximity of the school to the site when considering the school's sensitivity to air quality impacts. The Report was amended (**Appendix 12**) to accurately reflect the distance between the school and the development site.

3.2.3. City of Newcastle

A meeting with City of Newcastle occurred on 16th March 2022. Matters discussed at the meeting are also addressed in the response to submission in Section 4.1 below.

4. RESPONSE TO SUBMISSIONS

A response to submissions is provided in *Table 4.1: Agency submissions* and *Table 4.2: Response to matters raised in public submissions and authority submissions (by topic)*. Each issue raised in the submissions received are addressed in this section.

4.1. Agency Submissions

Submissions were received from the following agencies and organisations:

- Subsidence Advisory NSW
- Biodiversity Conservation Division
- City of Newcastle
- Department of Planning, Industry and Environment – Water
- Department of Planning, Industry and Environment – Crown Land
- School Infrastructure NSW
- Heritage NSW
- Heritage NSW – Aboriginal Cultural Heritage
- Hunter Water
- Transport for NSW

Table 4.1: Agency submissions

ISSUE	RESPONSE	REFERENCE
Subsidence Advisory NSW		
Subsidence Advisory NSW refer to the Notice of Determination previously issued in relation to the proposed development.	No further action required.	N/A
Biodiversity Conservation Division		
BCD has reviewed the EIS, including relevant appendices, in relation to impacts on biodiversity (including matters of national environmental significance [MNES] under the Environment Protection and Biodiversity Conservation Act 1999) and flood risk. A biodiversity development assessment report waiver was issued for the project on 8 September 2021 and no further biodiversity assessment is required. BCD is satisfied with the flooding and flood risk assessment in the EIS and no further flooding assessment is required.	No further action required.	N/A
City of Newcastle		
Strategic planning		
CN are undertaking precinct planning for the Broadmeadow Catalyst Area in alignment with the Greater Newcastle Metropolitan Plan (GNMP) and Local Strategic Planning Strategy (LSPS). Higher density residential and commercial development is expected to occur within the Broadmeadow Catalyst Area Precinct. Assessment of the proposal should ensure that the amenity of the surrounding residential environment is not adversely affected, so as not to potentially limit the ability to increase densities on surrounding land in the future to meet the needs of the growing city.	The proposal has been carefully formulated to minimise impacts to the amenity of surrounding residential land. The proposal in no way limits future development of surrounding land to higher density development. The proposed improvement of an existing recreation facility (major) will support the growth of the City's population by providing additional recreation and employment opportunities close to residential areas.	N/A
Streetscape / visual impact		
Inconsistency between landscape plans and architectural plans. Fencing details missing.	Coordination has occurred between the amended Architectural and Landscape plans to resolve any previous inconsistencies.	Revised Architectural and landscape plans

ISSUE	RESPONSE	REFERENCE
<p>Reliance on the proposed street trees to significantly mitigate the visual impacts of the development. Additional advanced screening tree species on site to be included in the landscape design.</p>	<p>Fencing details are accurately shown on the Landscape plan and Architectural plan.</p> <p>Substantial landscaping is proposed within the subject site to provide visual screening. Screening hedges and trees are proposed within the Chatham Street and Darling Street setbacks. In addition, screening hedges, trees and shrubs are proposed along the car park perimeter and along the eastern and northern extents of the building footprint. The planting schedule on Landscape plan Sheet LP08 (Appendix 3) identifies the pot size and minimum height of trees and shrubs at planting. Advanced planting is proposed, pot sizes have been increased from the original landscape plans submitted with the EIS.</p> <p>Street trees are provided in accordance with City of Newcastle's (CN's) street tree requirements.</p> <p>New Streetscape Renders show the proposed built form comparative to / in the context of, the surrounding residential development as much as practicable considering the separation provided by Chatham Street and Darling Street.</p> <p>However, the even more substantial separation distance between the proposed development and the educational establishment makes properly conveying a visual comparison between them ineffective. To this end, streetscape renders showing the proposed built form comparative to the educational establishment are not provided.</p>	
Flood management		
<p><u>Flood Planning Level:</u></p> <p>CN recommended the "Goods Storage Shed" and the "Equipment Shed" be set with a floor level of RL 6.850m AHD, based on anecdotal data from the 2007 "Pasha Bulka" storm.</p>	<ul style="list-style-type: none"> MPC Consulting Engineers (MPC) has relied on the Flood certificate from CN (Ref: FL2019/00101, dated 22 May 2019) in the design of flood management for this development. MPC sought and received confirmation from CN's Mr Alastair Peddie on [4:29pm, Wednesday 30 September 2020] that the above-mentioned flood certificate was still current and relevant for this development. 	<p>Revised Stormwater Management Report</p>

ISSUE	RESPONSE	REFERENCE
	<ul style="list-style-type: none"> The flood certificate states a 1% AEP flood level in the South West corner of the NJC site (i.e. in the area of this proposed Stables development) of RL 6.35m AHD. The Goods Storage Shed and Equipment Shed are non-habitable buildings (similar risk to a garage structure) with a design floor level of RL 6.500m AHD, which is 150mm higher than the 1% AEP flood level in that location. Given that the Goods Storage Shed and Equipment Shed areas with floor levels at RL 6.500m AHD are not habitable areas, and are 150mm above the 1% AEP flood level, it is reasonable to maintain the currently proposed floor level of RL 6.500m AHD. 	
<p><u>Flood Storage:</u></p> <p>CN request additional analysis of flood storage potential impacts on adjacent properties.</p>	<p>MPC has estimated that fill placed on the entire footprint of the 1%AEP flood storage area within the proposed development, up to the 1% AEP flood level (which is very conservative), would displace in the order of 1,300m³ of flood storage. Analysis of the flood maps included with the flood certificate indicate a flood storage (within the vicinity of this proposed development) for the current 1% AEP flood storage surface area would be in the order of 190,000m². Subsequently, if the 1,300m³ was displaced from the NJC site then the worst case would be an increase in flood levels in the order of 7mm. Noting that this is a conservative scenario, the potential for a 7mm increase in 1% AEP flood level is considered negligible, and subsequently MPC is satisfied that there would be no adverse impact on the neighbouring properties.</p>	<p>Revised Stormwater Management Report</p>
<p><u>Refuge Provision:</u></p>	<p>No additional information was requested by CN regarding provision for flood refuge in the development.</p>	<p>N/A</p>
<p><u>Flood Risk Management:</u></p> <p>CN recommended that a Flood Management Plan be prepared due to the intention to rely on surface on-site detention of stormwater in the car parks.</p>	<p>MPC has designed the car parks with numerous localised temporary on-site surface detention storage areas. These locations generally coincide with “rain gardens” in the carpark and have been designed to limit the depth of storage of surface water to 200mm so as to comply with the Council DCP requirements in this regard.</p>	<p>Revised Stormwater Management Report</p>

ISSUE	RESPONSE	REFERENCE
	Subsequently, with surface storage of stormwater being limited to discreet low-points in the car parks, with water depths not exceeding 200mm, MPC does not consider there to be a need for additional flood planning as a result of the proposed surface stormwater detention.	
Stormwater management		
<p><u>Assessment Philosophy:</u></p> <p>CN made reference to the publication by Sydney Water Catchment Authority and the NSW Government titled “Horse Property Developments in the Sydney Drinking Water Catchment” and recommended the development proposal be considered in the context of this document as well as the DCP.</p>	<p>MPC has reviewed the document and confirms that the stormwater management provisions recommended in the civil engineering design are:</p> <ul style="list-style-type: none"> • Consistent with the recommended principles in the “Horse Property Developments in the Sydney Drinking Water Catchment” document. • Consistent with the stormwater management design philosophy that was prepared for the recent NJC “Tie-Up Stalls” development, which previously received development approval from CN. • Consistent with stormwater management systems that MPC has designed for large scale equine developments in Western Sydney (Darley Australia Equine Training Facilities), in Moss vale NSW (Bong Bong Farm Stud and Training Facility), in the Hunter Valley (Godolphin Horse Stud, Kia Ora Stud) and Victoria (Yu Long Stud). 	N/A
<p><u>Impact from Horse Waste:</u></p> <p>CN raised concerns for the potential for horse waste to discharge into the Hunter Water of CN drainage systems.</p>	<p>Surface rainwater from parking areas, internal vehicular access and horse walkways will be directed to Gross Pollutant Traps and/or on-site bioretention basins for treatment prior to discharge.</p> <p>The NJC facility will have systems and procedures in place for management of horse waste within the site. These are described in further detail by other consultants as part of the approval documentation.</p> <p>A large portion of the proposed development (the north-east corner) drains to the existing dam in the centre of the track, so replicates the pre-existing drainage philosophy for that area.</p>	Revised Stormwater Management Report

ISSUE	RESPONSE	REFERENCE
	All of these systems in place will effectively manage the risk of the potential for horse waste to discharge into the Hunter Water of CN drainage systems.	
<p><u>Stormwater Design Comments:</u></p> <p>CN raised concern that Bioretention Basins BRB2 and BRB3 were close to the property boundary (within 4m of the boundary for a clay site).</p>	<p>The requirement to have a basin more than 4m from a property boundary is generally to prevent abnormal ground moisture conditions from having an adverse impact on footings of adjacent structures on neighbouring properties. For this particular development, the basins are proposed to be located close to the street frontage boundary and not adjacent to a neighbouring private property. Subsequently, there are no structures that would be adversely impacted by the proposed basin locations.</p> <p>The proposed BRB2 and BRB3 basin locations (close to the Darling Street boundary) are consistent with the proximity of similar basins that were approved by CN for the NJC "Tie-Up Stalls" project fronting onto Darling Street.</p> <p>Subsequently, there is no need to relocate the basins 4m from the proposed locations.</p>	Revised Stormwater Management Report
CN raised concern that Bioretention Basin BRB2 was close to the Goods Storage Building (within 4m of the building for a clay site).	The possible impacts of abnormal soil conditions from the basin BRB2 on the Goods Storage Building can easily be managed through good structural design of the building. MPC does not have any concerns regarding the proposed proximity of the basin BRB2 to the Goods Storage Building.	Revised Stormwater Management Report
CN requested On-Site Detention locations be clearly marked on the stormwater plans and typical sections.	<p>Stormwater Basins have been clearly marked on the stormwater plans. Typical basin details are included on the Section on Drawing 16-548-1-C03.50 (Section 1).</p> <p>Rain gardens in the car parks have been hatched on plan, and typical details (confirming the maximum Extended Detention depth of 200mm) are included on Drawing 16-548-1-C03.50.</p>	Revised Stormwater Management Report
CN raised concern that bio-retention basins located along Darling Street could be impacted by extreme weather events.	MPC confirms that the bio-retention basins have been designed for the 1% AEP storm event. The basin is designed to not rely on the emergency spillway unless the outlet pipes from the basin are fully blocked (which is	Revised Stormwater Management Report

ISSUE	RESPONSE	REFERENCE
	<p>extremely unlikely due to the configuration of the GPT into the basin and the outlet pits from the basin) just prior to a 1% AEP storm event occurring. The base of the basins are specified to be vegetated which also minimised the risk of re-mobilization of materials during extreme weather events. Subsequently MPC is satisfied that this concern has been addressed.</p>	
<p><u>Covenant on 90 Darling Street</u></p>	<p>The covenant is noted within deed 2339-880. De Witt Consulting's Registered Surveyor makes the following notes:</p> <ul style="list-style-type: none"> • The deed refers to a conveyance between the Commissioner for Railways and Tramways and the Jockey Club whereby the Jockey Club has sold the land for 1 pound to the Commissioner for Railways and Tramways bk1102 No553 29/12/1916 • Furthermore, the deed explains that if the land is not required by the Commissioner for Railways and Tramways for tramway purposes the land is to be reconveyed to the Jockey Club. • The deed states that the Commissioner for Government Transport acknowledges the land is no longer required for the purpose above and the Jockey club has requested the land to be purchased back in fee simple and the Commissioner has agreed. <p>This is followed by a metes and bounds description which excludes a portion of land for Cottage Creek.</p> <p>This conveyance is not noted on the title for 14/227704 but it is for 82/1138209 in terms of the land excluding minerals referred to in the old system conveyance.</p> <p>As this conveyance appears to be transferring land back to the Jockey Club in fee simple, it is de Witt Consulting's opinion that it not will have any impact to the development.</p> <p>No further consideration is required.</p>	<p>N/A</p>

ISSUE	RESPONSE	REFERENCE
<p><u>Stormwater Discharge Connections – Impact on CN Drainage Infrastructure:</u></p> <p>CN requested that further demonstration be provided showing the proposed design meets CN's design requirements (including Hydraulic Grade Lines for stormwater pipes in Chatham and Darling Streets).</p>	<p>The new stormwater pipes in Darling Street have been nominated away from the nominal kerb line so as to line up with the existing CN drainage infrastructure in the road reserve. The existing CN pipes in Darling Street along the NJC frontage are not located under the kerb and gutter so are not conventional. MPC determined that it is a better outcome for the stakeholders to maintain the current drainage pipe positions to manage risk of damage or disruption to in-ground services in the road reserve. Also, this approach has already been approved by CN for the "Race Day Tie-Up Stalls" project in Darling Street for the NJC site.</p> <p>MPC has included the existing CN stormwater pits, pipes and road gutters in the DRAINS model of the development and found that, due to the extensive amount of on-site detention being provided in the development, there will not be an adverse impact on the existing CN stormwater drainage infrastructure as a result of the proposed development. Pipe long-sections with hydraulic grade lines for the existing pipes are included in Appendix D of the Stormwater Management report (Stormwater Calculations).</p>	<p>Revised Stormwater Management Report</p>
Traffic management		
<p>The impact on intersections and further traffic SIDRA modelling is required to understand short and long-term impacts.</p>	<p>As discussed in consultation with CN, and described in the amended Traffic and Parking Assessment, the proposed stabling complex could generate:</p> <ul style="list-style-type: none"> • an additional 26 light vehicle movements outbound in the AM peak hour with less in the PM peak hour). Departures spread across several hours. • 8 truck movements (4 inbound and 4 outbound) per day. Not all of these are additional. • 3 additional horse float movements outbound in the AM and peak and retuning in the PM peak. • Removal of 76-115 existing traffic movements due to the relocation of the stables and the reduction in horses being "floated in" for daily training. 	

ISSUE	RESPONSE	REFERENCE
	<p>The number of additional traffic movements is negligible in the context of the local road network. In this regard, further SIDRA modelling is not required.</p> <p>These trips are distributed to generally to the north (14) and south (8) with the impact of these additional trips able to be accommodated on the local roads in a similar manner to the existing situation with minimal impact to the operation of the Chatham Street/Darling Street intersection and less impact on other intersections in the surrounding area. The removal of horse movements currently being floated into the track each day for trackwork will see a reduction in float and transporter traffic through this intersection.</p> <p>The long-term traffic demands associated with the future development of the broader Broadmeadow/Adamstown area is a matter for Council to address as part of its future planning for this precinct.</p> <p>No further assessment required.</p>	
<p>The intersection of Chatham Street and Darling Street is already congested during race days and a roundabout as an immediate road infrastructure device is required to manage both traffic on race days and that generated by the proposed development. Traffic signals may be required as a long-term solution. The provision of these devices will impact on the design of the development, in particular the proposed Signage Tower, Basin 1 and Goods Storage Shed. At a minimum, a splay will be required on the south-west corner of the development site similar in dimensions to that on the northwest corner of the intersection. It is recommended the applicant submit amended design plans.</p>	<p>The negligible increase in peak traffic generated by the proposed development does not warrant the introduction of a roundabout or traffic signals on the corner of Chatham and Darling Streets.</p> <p>It should also be noted that prior to preparing the DA, and during post-exhibition consultation with CN, the project team requested CN share their modelling of intersection performance (as it was assumed that the comments in the submission were based on traffic studies) and to identify any proposed plans for upgrades that should be addressed in the design. CN advised that no traffic modelling had been undertaken and no plans were available for a roundabout. In this respect, and having regard to the negligible impact the proposed development has on the intersection during peak periods, no further action will be taken to address CN's comments.</p> <p>Race days at the Broadmeadow track are not the subject of this development application. Notwithstanding this, measures to manage race day traffic may be subject of discussion between NJC and CN, outside of this development application.</p>	<p>N/A</p>

ISSUE	RESPONSE	REFERENCE
<p>Concerns are also raised at the likely impacts of the additional traffic generated by the development on the Glebe Road and Chatham Street intersection, and the Koree Road, Brunner Road and Chatham Street interface, and the Darling Street and Beaumont Street intersection.</p>	<p>During post- exhibition consultation between CN and the project team, CN confirmed that the concern around these intersections relates to the increase in residential density and other developments in the general area. CN was unable to provide traffic data to support the statement in the submission. As demonstrated above and in the amended Traffic and Parking Assessment, the proposed development will generate negligible additional traffic movements in the peak periods. There is no clear nexus between traffic generated by this development and any existing congestion of intersections referenced in the submission.</p> <p>Again, the long-term traffic demands associated with the future development of the broader Broadmeadow/Adamstown area is a matter for Council to address as part of its future planning for this precinct.</p> <p>No further assessment required.</p>	<p>N/A</p>
<p>Staff numbers on site will significantly increase as result of the development. Therefore, a thorough analysis of staffing numbers, including overall site, and demand for parking and other facilities for staff in the short and long term is required.</p>	<p>The proposed reduction in the number of horses stabled on site from 520 to 480 will also reduce the number of staff and associated parking requirements. However, in response to CN's submission and submissions received from the public, the proponent has increased the number of formalised off-street parking spaces available on site to 161 plus 16 bicycle spaces and 8 motorcycle spaces. The parking provision is considered to more than adequately service the proposed staffing numbers.</p>	<p>Revised Architectural plans.</p>
<p>Events such as barrier trials and other similar events should be analysed to understand the regularity of these events and expected changes to local traffic and parking in the area. The proposed stable complex itself may lead to more owners potentially attending the premises for training and trial sessions.</p>	<p>Barrier trials and race day events are not the subject of this application.</p> <p>Notwithstanding this, the proponent has confirmed that barrier trials are capped at a maximum of 100 horses per trial day. This number will not change as a result of the proposed stables development. As a result, it is reasonable to suggest that the number of owners attending barrier trials will not increase as a result of the proposed development.</p> <p>No further assessment required.</p>	<p>N/A</p>

ISSUE	RESPONSE	REFERENCE
It is noted most morning horse training operations associated with the development are generally undertaken within the hours of 6am – 10am, with an associated increase in peak hour traffic. An analysis of the afternoon travel patterns indicates the travel time between 3:00pm and 5:00pm of the development which coincide with the general traffic peak, including the school pick up times of the nearby by Merewether High School. It is recommended the applicant provide an Event Day traffic, pedestrian, and transport management plan to understand the operational requirements of the development.	CN's assumptions around peak traffic generation are incorrect. Refer to amended Traffic and Transport report for further information. Furthermore, race days at the Broadmeadow track are not the subject of this development application. Notwithstanding this, event day traffic management measures are proposed to assist minimise traffic and parking. Additional pedestrian facilities are proposed along the Chatham and Darling Street frontages to better manage pedestrian movement and safety.	Revised Traffic and parking assessment.
End user facilities (Bicycle parking, storage, change rooms and shower for staff and users of the facility) have not been provided.	End user facilities are provided within each of the stable blocks, the maintenance amenities and the dedicated trainers facility. Bicycle parking is now documented throughout the development.	Revised Architectural plans and revised Traffic and parking assessment
A pedestrian movement analysis to/from the car parking and transport hubs to the Entry Point is required. This should include safety analysis from transport hubs.	Again, this comment is mostly likely directed towards race day events which are outside the scope of this DA. No further assessment required.	N/A
A noise impact analysis is required due to the likely increase in pedestrian movements on local roads.	As above.	N/A
An overall cumulative traffic analysis is required. This analysis is to incorporate the traffic generated during event days, together with the traffic generation of the development and traffic from the existing road as a case scenario.	As above.	N/A
Parking demand		
<u>On-Street parking</u> On street parking analysis should identify the current parking and restrictions on race days and identify likely changes generated by the development.	This comment is mostly likely directed towards race day events which are outside the scope of this DA. Notwithstanding, restricted areas are shown on the amended Architectural plan. Furthermore, the amended Traffic and Parking Assessment recommends potential traffic and parking management measures on busier race days such as the Newcastle Cup and The Hunter.	N/A

ISSUE	RESPONSE	REFERENCE
Off street parking for horse floats and commercial vehicles	The off street parking shown within the Equine & Goods Drop Off – Pick Up zone is suitable to cater for the anticipated, very low demand for delivery and other commercial vehicles utilising the site – these will enter the site, load / unload goods and exit the site. It is also anticipated that very few horse floats will require parking at site. Those that do can park in the dedicated parking area located adjacent the recently constructed tie up stalls to the east of the development footprint.	N/A
<u>Off street car parking provisions</u> The on-site car parking count as indicated in the TIA does not appear to accurately reflect the current number of car parking spaces on site. The loss of off-street parking due to the proposal will have a significant impact on the surrounding local area by generating additional demand for the available on street parking. Race patrons seeking on-street parking spaces further away from the racecourse will create a need for additional infrastructure.	The amended Traffic and Parking Assessment provides detailed assessment of the parking demand generated by the development and the associated parking provision. Whilst the proposed staff numbers have decreased since the original DA submission, the parking provision on site has increased to 161 plus bicycle and motorbike parking. Although CN refers to the loss of parking, this area has never been formally used or line marked, acting as overflow for race day events. As well as better formalising the available overflow parking on race days, the proponent has identified an opportunity to utilise infield parking, serviced by a shuttle bus to bring racegoers to the entry gate on busier race days such as The Hunter and Newcastle Cup where there is typically higher patron attendance.	Revised Traffic and parking assessment
<u>Motorbike Parking</u> Concern is raised that the development has not provided any off-street motorbike parking spaces.	Eight (8) motorbike parking spaces are now provided.	Revised Architectural plans
<u>Bicycle Parking and End User Facilities</u> Concern is raised that the development has not provided any facilities for secured bicycle parking for staff and any end user facility such as showers, storage and change rooms.	Twelve (12) bicycle parking spaces are provided throughout the development footprint. End of trip facilities are provided within each stable block, the maintenance amenities and the trainers facility.	Revised Architectural plans
<u>Drop-Off and Pick-Up Zones</u>	Drop-off/pick-up and bus / coach parking areas along the Darling Street frontage have been retained and are noted on the amended Architectural plan.	Revised Architectural plans

ISSUE	RESPONSE	REFERENCE
The development has not considered the availability of drop-off/pick-up areas within the site for use by alternative transport operations such as Taxi, Uber, and the like. Similarly, no provision has been made for bus/coach parking.		
<u>Disabled Parking Provision</u> The location of the required accessible carparking referred to in the Access Report is not indicated on the architectural plans.	Two disabled parking spaces are now indicated on the plans.	Revised Architectural plans
<u>Emergency Management</u> The new public entry appears to be secured. Emergency management vehicle access for ambulance, police and fire services is required to be considered as part of this proposal.	Emergency management access is available in several locations across the NJC site including at the track crossing via Chatham Street. Appropriate access control system will be implemented during detailed design. The driveway leading to the Public Facilities Precinct (between the existing Administration building and the new Entry Tower) is not secured and is available for use by emergency vehicles.	N/A
Pedestrian management		
It is recommended the development provide footpaths along the Chatham Street and Darling Street frontages and associated pedestrian infrastructure such as pedestrian refuge, ramps and Local Area Traffic Management devices linking the site to the surrounding streets.	There is no clear nexus between the proposed development and increased pedestrian activity. Notwithstanding this, pedestrian footpaths are now proposed along the development footprint's frontage to Chatham Street and Darling Street. Additional pedestrian infrastructure is not considered to be warranted in respect of the proposed stables complex. CN may wish to use Section 7.11 contributions received from the proposed development for the construction of new pedestrian infrastructure which is more likely to be utilised by local residents and school students than staff of the proposed stables complex.	Revised Architectural plans
Vehicular Access, Driveway Design and Crossing locations		

ISSUE	RESPONSE	REFERENCE
<p>Two new driveways are proposed from Chatham Street, including the access to the Maintenance Drop Off area. The latter is of concern given it will be used by heavy rigid vehicle and is in a 40km/h restricted school zone.</p> <p>Three additional driveways are proposed on Darling Street frontage of the site. There are currently two driveways located in front of the Darling Street childcare centre and a new driveway has been constructed on the east of the childcare as part of the approved development application DA2019/01082.</p>	<p>The proposed driveway crossing servicing the Maintenance Drop Off Zone replaces two existing crossings and is therefore considered to be a positive outcome for the street. The extensive sign distances make the location eminently suitable for the proposed purpose. No further assessment required.</p> <p>The proposed driveway crossing servicing the Equine and Goods Drop Off Zone replaces an existing driveway crossing in use approximately 50 metres to the north. Again, clear sight distances are available making the location suitable for the proposed crossing. No further assessment required.</p> <p>Only one additional driveway on Darling Street is proposed – this is the Equine Goods Drop Off - Pick Up Zone exit driveway. The two remaining driveways for the staff and administration car park are existing.</p> <p>The driveways for each Pick Up – Drop Off zone have been designed in accordance with AS2890.2 with suitable width to allow for the entry and egress of the necessary vehicles that will service the development. Swept paths have been included in the amended plan set (Appendix 9). No further assessment required.</p>	<p>Revised Traffic and Parking Assessment and revised Vehicle Turning Path plans</p>
<p>Gates are proposed at the entry and exit. It is recommended that information is provided by the applicant in relation to the operation and management of these gates to ensure that traffic movements on Darling Street are not adversely impacted on.</p>	<p>The gates shall operate automatically via a managed access control system and are necessary for the safety and welfare of horses and staff on site.</p> <p>The gates are setback 5.5m from the property boundary in accordance with CN's advice.</p>	<p>Revised Architectural plans</p>
<p>Concern is raised that the proposed staff carpark comprising 94 spaces is only accessible via a single combined entry/exit driveway to Darling Street.</p>	<p>The staff carpark now caters for 161 spaces and is serviced by an existing driveway adjacent the proposed entry tower as suggested by CN.</p>	<p>Revised Architectural plans</p>
Public domain		

ISSUE	RESPONSE	REFERENCE
<p>Having regards to the above engineering aspects the following public domain works will be required in connection with the development, and will be subject to separate approval under Section 138 of <i>Roads Act 1993</i>:</p> <ul style="list-style-type: none"> • Construct new pedestrian footpath across site frontages linking to existing footpath on Chatham Rd and Darling St linking to Lowe St. • Construction of a roundabout or traffic signal at Intersection of Darling St/Chatham Rd – potential land dedication as road reserve at north-western corner of the site for road widening and sightlines. • Additional traffic works if required via SIDRA modelling. • Additional pedestrian structures such as kerb blisters and pedestrian refuge at appropriate locations. • Reconstruct kerb and gutter and drainage infrastructure. • New driveways and removal of redundant driveways. • Streetscape and street lighting. 	<p>The proposal involves the construction of new footpaths along the development's frontage to Chatham Street and Darling Street.</p> <p>As discussed above, there is no nexus between the proposed development and the need for a roundabout or traffic signal at the intersection of Darling Street / Chatham Street.</p> <p>There is no nexus between the proposed development and the need for land dedication as road reserve.</p> <p>The proposed development has demonstrated a negligible increase in traffic movements. There is no additional SIDRA modelling or traffic works warranted.</p> <p>There is no nexus between the proposed development and the need for pedestrian infrastructure such as kerb blisters or pedestrian refuge. CN may wish to utilise development contributions generated by the development for this purpose.</p> <p>The proposed development will reconstruct kerb and gutter where required as a result of drainage works.</p> <p>The proposed development will construct new driveways and remove redundant driveways where relevant.</p> <p>Street trees will be planted in accordance with CN requirements.</p> <p>No upgrade to the existing street lighting is proposed or considered necessary as a result of the proposed stables complex.</p>	<p>Section 138 approval for relevant works to be obtained at detailed design stage.</p>
Street trees		
<p>CN's City Greening Team have provided comments regarding the existing and proposed street trees.</p>	<p>CN's advice has been adopted, with the proposed changes incorporated into the amended Landscape plan.</p>	<p>Revised Landscape plan</p>
Heritage		

ISSUE	RESPONSE	REFERENCE
<p>The proposed development has the potential to impact the setting of the heritage item.</p>	<p>The amended SoHI provides a detailed assessment of the proposed works in the context of the overall site and concludes the following:</p> <p><i>The proposed works, despite their size, have been designed to minimise their impact upon the existing significant buildings by increasing setbacks, managing scale and proportion and using subdued colours. These efforts allow an increase of space around the significant buildings for interpreting their significance and appreciating their design, material and detail.</i></p> <p><i>The proposed works have the potential to enhance the significance of the historic buildings and the Broadmeadow Racecourse Item by attracting better trainers, jockeys and horses, therefore creating better competition and enhancing the spectacle of race days. When approaching the site from the southwest, which is common, the proposed works have the potential to enhance the excitement of coming to the races thus having a corresponding enhancement to social significance.</i></p> <p><i>Once inside the gates of the racecourse, and especially from within the grandstands, the proposed works will not diminish the focus of visitor to the site from the historic buildings or from the racetrack where the action is taking place.</i></p> <p>No further assessment required.</p>	<p>Revised SoHI</p>
Pest management		
<p>It is recommended the management plan and pest control recommendations be expanded to discuss and address fly control and 'feral' birds.</p>	<p>The OWMP has been amended to address these issues. The matter is also discussed in Section 2.7 above.</p>	<p>Revised OWMP.</p>
Waste water management		

ISSUE	RESPONSE	REFERENCE
Inadequate consideration has been given to the collection, treatment, and disposal of wash down and other contaminated water from the stables, wash bays, pool, and other likely sources in the proposed stable complex.	Refer to comments relating to waste water management provided above.	N/A
Noise management		
<p>The Noise Impact Assessment does address sleep arousal and makes several recommendations for noise control measures; however, this issue will need to be carefully considered to ensure all feasible and reasonable measures have been implemented to minimise this potential for impact.</p> <p>In addition, the recommendations of the NIA regarding the provision of an acoustic fence and barriers have not been addressed in the architectural drawings</p>	<p>The revised Noise Impact Assessment provides further assessment of potential sleep arousal.</p> <p>Where relevant, the recommendations of the Assessment have been addressed in the revised Architectural and Landscape plans.</p>	Revised Architectural and Landscape plans
Odour management		
Appropriate ongoing maintenance of these measures will be required to ensure this is the case.	The OWMP provides ongoing management measures designed to mitigate potential odour impacts to an acceptable level. The Air Quality Report supports the OWMP and concludes that the measures proposed are suitable.	Revised OWMP Revised Air Quality Report
Signage		
It is not clear if the signage panels will incorporate mechanical or electronic moving images or displays.	The signage panels will not incorporate mechanical or electronic moving images or displays.	N/A
Section 7.12 Local Infrastructure Contribution Plan		
A maximum levy of 1% of proposed cost of the development is applicable. It is recommended the applicant provide a cost summary report prepared by prepared a quantity surveyor who is a registered member of the Australian Institute of Quantity Surveyors to enable the required monetary contribution to be calculated.	Noted.	N/A

ISSUE	RESPONSE	REFERENCE
Department of Planning, Industry and Environment – Water		
The proponent must ensure sufficient water entitlement is held in a water access licence/s to account for the maximum predicted take for each water source prior to take occurring unless an exemption under the Water Management (General) Regulation 2018 applies.	Noted, however the development does not propose to access or utilise any ground water.	N/A
Department of Planning, Industry and Environment – Crown Land		
As there no Crown land, roads or waterways are in the vicinity of the proposal/are affected by the proposal, Crown Lands has no comments at this time.	Noted	N/A
School Infrastructure NSW		
Consultation with SINSW requested	Direct consultation was carried out with SINSW on 16 th March 2022. Amendments to the Noise Impact Assessment and Air Quality Impact Assessment were made a result.	Revised Noise Assessment Revised Air Quality Assessment
<u>Traffic Impacts</u> Clarification sought as to the timing of traffic investigations. SINSW requests that the Traffic Impact Assessment be amended to clearly address construction traffic procedures, including mitigation of any associated conflicts with construction vehicles, pedestrians and commuters (along Chatham Street) during the construction phase. Conflicting staff numbers in EIS and traffic report.	The project traffic consultant was available during direct consultation to provide clarification on the timing of traffic investigations. An updated preliminary Construction Traffic Management Plan is provided in the revised Preliminary Construction Management Plan, which stipulates that haulage of construction materials must not occur through the school zone during peak student pick up and drop off times (8:00am – 9:30am and 2:30pm to 4:00pm on school days). A more detailed plan will be prepared following appointment of a construction contractor and prior to the issue of a construction certificate. The updated Preliminary Construction Management Plan and Traffic Management Plan also now introduce a formalised requirement for pedestrians to use the opposite side of Darling and Chatham Streets during construction to limit pedestrian interaction with the construction zone.	Revised Traffic Impact Assessment. Revised Preliminary Construction Management Plan

ISSUE	RESPONSE	REFERENCE
	Staff numbers have been clarified in the revised Traffic Impact Assessment.	
<u>Dust Risk + Magnitude for School</u> Proposed mitigation measures should be included as conditions of consent.	Noted.	N/A
<u>Odour Risk for School</u> SINSW notes that the proposed stable Blocks E, F and G are all positioned closer to the western boundary of the site than the existing stables and will experience a significant increase in intensity. These stables are proposed to be two storeys in height, accommodating up to 240 horses and will be naturally ventilated. In light of this fact, SINSW have identified some inconsistencies regarding the distance of the proposed development from surrounding sensitive uses. Proposed mitigation measures should be included as conditions of consent. If air quality issues persist at the school, mitigation measures are to be reviewed and a more tailored approach should be prepared for the affected schools.	The number of horses proposed to be stabled on site has been reduced from 520 to 480 which will further assist the mitigation of potential impacts. The revised Air Quality Impact Assessment has addressed the inconsistencies regarding the distance of the proposed development from the surrounding sensitive uses. Comments regarding mitigation measures are noted.	Revised Air Quality Assessment
<u>Noise management</u> SINSW recommends that the mitigation measures identified in the Noise Impact Assessment be conditioned as part of any future consent for the site. To mitigate construction noise, SINSW requests clarification regarding any proposed noise and/or vibration impacts to the school site during the construction period. In addition, the management strategies outlined in the Noise Impact Assessment should be extended to the school site, particularly those regarding the programming of noisy activities. Where possible, these activities should occur outside school operating hours.	Noted	N/A
<u>Operational Management</u> SINSW requests that the OWMP be updated to include the following information: <ul style="list-style-type: none"> • Pedestrian, traffic and Access Management during operation • Consultation and complaints handling • Noise management measures • Race day security and safety management procedures. 	The proposed development was revised to include a pedestrian footpath along the Chatham Street and Darling Street frontage of the development footprint. The OWMP was revised to include a complaint handling procedure.	Revised Architectural plans Revised OWMP

ISSUE	RESPONSE	REFERENCE
	Noise management measures will likely be enforced as conditions of consent and may be incorporated into the OWMP in the future. The proposed development does not relate to race day activities. Any specific concerns regarding race day safety and security should be directed to NJC.	
<u>Waste management</u> Provide details of quantum of waste and timing of removal. Waste management measures to be introduced as conditions of consent.	The OWMP outlines the volume of waste and method and timing of collection.	Revised OWMP
Heritage NSW – Aboriginal Cultural Heritage		
Heritage NSW also supports the development of an Aboriginal Cultural Heritage Management Plan, to be developed post approval and in consultation with the Registered Aboriginal Parties for the management of Aboriginal cultural values in the Project Area. An archaeological test and salvage excavation is to occur post-project approval, but implemented before natural soil layers are disturbed. The subsurface archaeological investigation is to be done in consultation with the Registered Aboriginal Parties.	Noted	N/A
Hunter Water		
Hunter Water provided Newcastle Jockey Club with a Notice of Formal Requirements (HW Ref 2021-1123) on 13 July 2021 in relation to servicing the proposed development. Hunter Water will require a revised Development Application if there are any changes to the development proposal, or a new Development Application should the current Notice of Formal Requirements expire. A Compliance Certificate will be issued under Section 50 of Act once Hunter Water's requirements have been met.	Noted	N/A
Transport for NSW		
TfNSW has reviewed the information provided and raises no objection to or requirements for the proposed development as it is considered there will be no significant impact on the nearby classified (State) road network.	Noted	N/A



ISSUE	RESPONSE	REFERENCE
Council must ensure that the proposed driveways allow for clear sight to oncoming vulnerable road users (footpath and roadway).	Sight lines have been assessed in the revised Traffic and Parking Assessment as suitable for the safety of pedestrians and cyclists.	Revised Traffic and Parking Assessment

4.2. Response to submissions by topic

The key matters raised in the submissions include:

- Scale of development
- Conflict with residential areas
 - Air quality, odour and dust impacts
 - Noise
 - Visual impact
 - Traffic, access and parking
- Ecological impacts
- Pests
- Negative impacts of horse racing
- Stormwater and flooding
- Accessibility of the submission process

Below is a summary of the key issues and comment raised in the submissions along with the applicant's response to them.

It is relevant to note that 13 of the 31 received submissions directly express support for the development. Only 12 submissions are classed as direct opposed to the development. This suggests that it is not a majority which opposes the development.

Table 4.2: Response to matters raised in public submissions and authority submissions (by topic)

ISSUE	RESPONSE	REFERENCE
Scale of Development		
The sheer size of this project in the vicinity of 100's of residents is not suitable.	<p>The proposed development expands upon an existing use that has operated for over a 100 years and has a long history of association with the surrounding residential area.</p> <p>Reduction in number of horses will reduce impacts such as traffic</p>	
The justification for the 67% increase on current capability is not adequate as the Management Plan states that due to lack of resources (rider availability), there is a maximum of 375 horses expected to use the facility on any one day. If increased capacity were to be required in the future, the location of the current stables would be available for refurbishment and/or re-development.	The justification provided for this increase in capacity considers predictions of future growth. The 375 expected maximum takes into account current expectations as well as variations such as offsite races, rider hours, illness etc. These variations require additional spaces to facilitate variances greater than expected and even further future proofing beyond the predicted growth moving forward. The exiting stables are unable to meet this expected growth even if refurbished.	Operation and Waste Management Plan
Having a lesser capacity provides benefits for air quality, traffic, parking and noise.	<p>A lesser capacity would provide benefits for air quality, traffic, parking and noise.</p> <p>The amended architectural plans proposed a lesser capacity compared to the original submission (480 down from 520).</p> <p>However, as outlined in the EIS (section 1.7) refurbishment of the existing stables was considered but deemed to be not a preferable option.</p>	Amended Architectural Plans, EIS
Conflict with Residential Areas		
General		
<u>Neighbourhood Character</u>	The site is primarily zoned RE2 Private Recreation pursuant to Newcastle LEP 2012 and is permitted with consent under Recreation facilities	

ISSUE	RESPONSE	REFERENCE
<p>This development is the wrong type for a residential area given the proximity of the site to schools, residences and other community facilities, and in context of increasing levels of urban densification in the local area.</p> <p>A project of this size is not suitable for a residential area and will have a significant impact on the surrounding area. There is a significant risk of over-development of the racecourse.</p> <p>Whilst the exterior EJE Architectural elevations of the stables development with the rendered surrounding trees look presentable, they do however look largely industrial in context of the surrounding residential area. A stable facility of this size is more suited for an industrial area.</p> <p>Assessment of the proposal should ensure that the amenity of the surrounding residential environment is not adversely affected, so as not to potentially limit the ability to increase densities on surrounding land in the future to meet the needs of the growing city. The proposal must be considered in the context of existing and anticipated development plans for the local area more broadly, as well as the concept plans for the racecourse as a whole.</p>	<p>(major). The proposed development is consistent with the objectives of the zone. Given the proximity of Newcastle CBD 4km to the east and Newcastle Transport Interchange 1.5km to the northeast, a facility of this sort is deemed appropriate as part of the city centre. Furthermore the site benefits from an existing use as a race track which has operated for over 100 years.</p> <p>The Broadmeadow suburb features a number of business zones, IN2 Light Industrial sectors, and RE1 Public Recreation areas. As such the area cannot be classed as a residential area in this context.</p> <p>The proposed development is entirely contained within the subject site. Any adverse impacts on the amenity of the surrounding area reflect continuing matters from the historical and existing use of the site. Any future growth in the surrounding area will occur in the context of the existing and future use of NJC and will be well aware of the zone conflicts between the residents and the race track. Future developments will reflect and respond to this conflict.</p>	<p>Newcastle LEP 2012, EIS</p>
<p><u>Quality of Life</u></p> <p>If the development goes ahead, resident's quality of life will be reduced. The development will have negative air quality, noise and visual impacts.</p> <p>This will ruin the Broadmeadow area. Residents will sell up and the efforts to gentrify the suburb will be reversed.</p>	<p>Efforts have been made to mitigate any negative impacts on resident's quality of life. These are summarised in the EIS.</p> <p>The Broadmeadow suburb features a number of business zones, IN2 Light Industrial sectors, and RE1 Public Recreation areas. The development is therefore in keeping with this existing character and use of the site.</p> <p>Gentrification is a controversial subject and if this development halts this process then arguably this is a benefit to the community as residents will not be priced out of their own homes.</p> <p>Removal of early morning floating will significantly reduce traffic and associated impacts on nearby residences.</p>	<p>EIS</p>
<p><u>Construction Hours</u></p>		

ISSUE	RESPONSE	REFERENCE
<p>Construction should not occur outside standard hours. Why have the term standard if they aren't going to be complied to? If the boundary for 'standard hours' and what's considered 'reasonable' is pushed an inch, it will be taken a mile.</p>	<p>The term "standard construction hours" is the standard term used in reference to construction hours for all developments. If approved, the conditions of consent will utilise this wording, placing a legal obligation upon the developer and contractors to adhere to these hours of construction that is enforceable if breached.</p>	<p>Noise Impact Assessment</p>
<p><u>Compensation</u></p> <p>Has any thought has been given on how NJC may be able to compensate residents affected to allow them to make adjustments to their property to deal with the issues resulting from the proposed expansion?</p>	<p>Mitigation measures proposed in the EIS, this report and amended supporting documents confirm that impacts can be minimised to the extent that surrounding land holders will not be unduly impacted by the proposed development.</p>	<p>EIS and amended documentation.</p>
<p><u>Alternative Solutions</u></p> <p>The Club would be far better off exchanging the land to government for parkland etc. and then moving to rural land.</p> <p>Potential alternatives:</p> <ul style="list-style-type: none"> Decrease stable development size to single story with further setbacks from neighbouring homes and Merewether High School concealed behind trees and landscaping. Redevelop current stables with more appropriate state of the art facilities. Build new stables facility in a suitable local industrial area. 	<p>Comparing the site to other race courses throughout NSW, many examples can be found where they are located adjoining residential land (Canterbury, Parkes, and Randwick in particular are surrounded by residential buildings similar to NJC). A few examples of race courses at the edge of urban centres can be found, though separated from dwellings by industrial and business sectors. Very few examples of purely rural race courses can be found.</p> <p>The reason for this is that by locating themselves near urban centres, the race courses are better positioned to attract race goers and the necessary staff, trainers and jockeys.</p> <p>Newcastle is an urban area. If the Club were to undertake the enormous task of relocating to a rural area, they will be giving up the strategic advantages of being positioned near the heart of Newcastle, and foregoing the historic significance and use of the facility which has been in operation since 1840.</p> <p>As addressed in the EIS (section 1.7), the current stables are unable to facilitate the expected growth of the industry. Moving the stables off site to a local industrial area presents logistical issues with transporting to and from the race course, increasing traffic in the surrounding area. Furthermore, an</p>	<p>EIS</p>

ISSUE	RESPONSE	REFERENCE
	industrial area is an unhealthy place to house horses, impacting upon their welfare. Redesigning the proposal to address as much as possible the concerns raised in the submissions is therefore deemed the only option.	
This development is unnecessary and against the wishes of the majority of Newcastle residents.	<p>The development is justified on the basis of future growth of the racing industry and is therefore deemed necessary to facilitate this as the current infrastructure is incapable of meeting this demand.</p> <p>13 of the 31 received submissions directly express support for the development. Only 12 submissions are classed as direct opposed to the development. This suggests that it is not a majority which opposes the development.</p> <p>Mitigation measures are proposed to minimise the impact of development.</p>	EIS and supporting documentation
<p>The proposal involves significant detriments to the local area, whilst providing little or no benefit to the local community. Increased activity levels at the racecourse can generally be expected to increase the impacts on the local community on race days, including higher levels of anti-social behaviour by race-goers and parking issues.</p> <p>Whilst there may be some limited additional employment opportunities, these are unlikely to benefit of the local community.</p>	The development will have positive economic benefits for the Newcastle area. The submissions in support (presented below) outline how the development will be of a significant economic benefit to the region.	
Air Quality, Odour and Dust Impacts		
<p><u>Air Quality</u></p> <p>Concerned by the proximity of waste to residents. This represents a significant health and safety concern from air born contaminants.</p> <p>This potential heightened health risk for local residents and students with respiratory issues will be exacerbated by the elevation of the proposed 2 story structures.</p>	<p>The waste removal store shields nearby residents from prevailing winds that would carry harmful odours and air.</p> <p>Mitigation measures are provided to limit this impact.</p>	Air Quality Report, Operation & Waste Management Plan
<u>General Odour</u>		

ISSUE	RESPONSE	REFERENCE
<p>The proposal inadequately mitigates the risk of odour and dust from the stables.</p> <p>The control measures are too focused on the storage of the waste as opposed to the potential impacts of the stables natural ventilation and waste bin logistics.</p> <p>The EIS misrepresents the situation when it states: “the separation distance between residences and the source of any generated and stored waste will be far greater under the proposed development than it is currently”. This reflects where the stables are currently located. The proposed location for the new stables has never had stables, so to state that it will be an improvement is inaccurate for all residents living on Chatham and Darling Street.</p> <p><u>Breezes</u></p> <p>The stables are east of Chatham street residences meaning an easterly wind will come laden with odour. This was omitted from the report.</p> <p>Reduced north east sea breezes due to size of the development.</p> <p><u>Ventilation</u></p>	<p>The waste removal store shields nearby residents from prevailing winds that would carry harmful odours and air.</p> <p>A number of mitigation measures will be implemented that will address the impacts of odour on nearby residents.</p> <p>With the proposed cleaning regime, the storage of the waste is where the greatest odour sources are anticipated, hence why it is the focus of the mitigation measures.</p> <p>The statement in the EIS refers to the residents of Hibberd street being directly adjacent the existing stables with little, if any, separation. While the new stables will be closer to Chatham and Darling Street residents, the separation will be greater than currently experienced by Hibberd, with Chatham and Darling Street separating residents from the site plus additional setbacks within the site being provided. The residents of Hibberd Street will benefit greatly from the relocation of the stables. The furthest distance from any residents (even if closer to some and further from others than currently) is therefore greater under the proposed development and the statement in the EIS is correct.</p> <p>The proposed development shields nearby residents from prevailing winds that would carry harmful odours and air. The revised Air Quality Report recommends the windows and doors of the stabling facility would be closed during periods of heavy wind in order to reduce any potential or dust or odour impacts beyond the building.</p> <p>Sea breezes are from the east not north east. Any reduction in breeze due to the size of the development is such that odour impacts will be reduced.</p>	<p>Air Quality Report, Operation & Waste Management Plan, EIS</p>

ISSUE	RESPONSE	REFERENCE
<p>The stables are naturally ventilated with no filter on air pollution to minimise contamination. The result will be continuous air pollution, reduced use of outdoor areas, impact on health, and increased likelihood of disease.</p> <p>The stables are designed such that they have open louvers on the northern and southern elevations. According to the AQR, the predominant winds are in the north-westerly direction. The result of these two factors is it will be a regular occurrence for wind to be blowing through the stables and in the direction of residences on Darling Street.</p> <p>No matter how well sealed the stables will be, with up to 520 horses housed within the proposed site (depending on wind direction) it will be a blight on surrounding properties. Residents will need to shut their windows to avoid odour. This already occurs with the small amount of infrastructure currently on site.</p>	<p>Natural ventilation is more appropriate for the wellbeing of the horses and staff compared to recycled mechanical ventilation. The buildings are substantially enclosed to limit odour and air quality concerns.</p> <p>North-west is not directly north and therefore there any wind will be disrupted opposed to clear breezeway. This is further the case with the height of the stables blocking odour carrying winds. Any odour carrying north-west wind will be directed to the further away south-east opposed to the closer directly south residents.</p>	
<p><u>Waste Odour</u></p> <p><u>Waste Storage Solution</u></p> <p>The faecal matter will stay in the stables for extended times as the Operation & Waste Management Plan states that the pickup of manure will be once a day between 9am & 2pm. It also states that the frequency of cleaning will be twice a day. Residents will be forced to smell the faecal matter.</p> <p>The proposed solution of lidded boxes full of faecal matter is inadequate. This solution relies on a lot of human effort and diligence. There needs to have more technologically advanced solution.</p> <p>During the information session a gentleman from the neighbourhood towards the existing manure storage near Beaumont Street informed that the lids are often left open and pests are unbearable.</p> <p>The process of getting the waste from the stable to the bins whilst minimising odour and dust is largely overlooked (apart from frequency of clean out).</p> <p>The proposed measures to contain and regularly dispose of waste have been assessed by the submitted Air Quality Report as minimising this impact to an acceptable level. However appropriate ongoing maintenance of these measures will be required to ensure this is the case.</p>	<p>The provision of cleaning is for twice per day, meeting the industry standard. The cleaning will be spread out to occur once in the morning and again in the afternoon to address odour concerns. Further, per page 6 of the Operation & Waste Management Plan:</p> <ul style="list-style-type: none"> • 2 x deliveries / removal activities per day during business hours via 45ft articulated semi-trailer <p>As such, pickups will occur twice a day, not once, as referenced.</p> <p>The proposed lidded "Mega" bins are widely used in the racing industry at training centres. This is therefore deemed appropriate for the proposed use as well.</p> <p>This claim that the existing storage lids are left open will need to be confirmed. Periodic checks will occur to ensure the bins are well sealed.</p> <p>Waste will be collected directly into the waste bins at the stall and transferred by Walkie Stacker or Pallet Jack. The waste storage is located at the front</p>	<p>Air Quality Report, Operation & Waste Management Plan</p>

ISSUE	RESPONSE	REFERENCE
<p><u>Location of Storage</u></p> <p>The storage of 156 bins full of faecal matter of horses is proposed to be stored 20 meters away from residences. This is highly inappropriate location even if the solution will actually work. Why is the waste being stored so close to the residential area when NJC has a land holding of 48 hectares? Why does the NJC not look into underground storage of the manure and pump it out every day?</p>	<p>of the stable blocks to minimise the distance to transfer the waste. There will be as such no odour impact resulting from this transfer.</p> <p>The updated OWMP stipulates that NJC staff must not pick up bins that are not lidded and that spare lids will be kept in the facility in case of missing and broken lids to ensure that full waste bins have their lids secured at all time.</p> <p>The storage location of the waste is such to be as near as possible to the stable, reducing the need to transfer the bins elsewhere on site. This also permits the ease of pickup by locating it near access way for the trucks.</p> <p>A suggestion that waste be stored in the centre infield area is not feasible given the amended proposal now seeks to utilise that space for overflow parking on busy race days to address residents' concerns about traffic. Additionally, storage of waste in the infield is likely to attract pests and vermin to the NJC land and surrounding residences.</p>	
<p><u>Dust</u></p> <p>Last time there was construction works at the jockey club there was dust over everything and windows had to be kept closed to keep the dust out there for increasing energy bills and having to clean surfaces outside constantly.</p> <p>There is already significant escape of dust from the racecourse and the proposal will only make matters worse.</p>	<p>Dust is an unavoidable consequence of construction work. Mitigation measures can be put into place if dust becomes an issue. Dust mitigation measures are included in the Preliminary Construction Management Plan.</p> <p>The design of the buildings suppress wind entering the stables thereby preventing any dust from escaping. In the event that there is still dust concerns, during heavy winds windows and doors could be closed to further limit any dust movement.</p>	<p>Air Quality Report, Operation & Waste Management Plan</p> <p>Revised Preliminary Construction Management Plan</p>
<p><u>Alternative Solutions</u></p> <ul style="list-style-type: none"> Re-orientate the stables such that the natural ventilation is directed away from nearby residences during prevailing winds 	<p>Air quality impacts are addressed in the amended documentation.</p>	<p>EIS, Operation & Waste Management Plan</p>

ISSUE	RESPONSE	REFERENCE
<ul style="list-style-type: none"> • Install mechanical air extraction and filter units to stable buildings • Decrease stable development size to single story with further setbacks from neighbouring homes and Merewether High School. • Redevelop current stables site with new facilities that are more proportionate to NJC's Management plan with its expected maximum use of 375 horses at the facility on any one day. Redeveloped stables could feature a new track access point, which would reduce the need for trucking horses from the stables to the track reducing relative truck/traffic noise and the impact of the proposed new stable development on the local residents/community. 	<p>The number of horses has been reduced from 520 to 480 with associated reduction in potential impacts.</p>	
Noise		
<p>General Noise</p> <p>"Noise generated by the proposed site will be audible at times but not intrusive at any nearby residence" – How can you guarantee this with such dramatic increase in horse population, increased traffic and staff/workers?</p> <p>The proposed development has a significant potential for noise impacts on the surrounding residential premises, particularly in relation to the night-time period. Collective noise from 520 horses neighing all night & early hour starts of 3am will produce significant noise.</p> <p>Issue regarding increased noise during construction for students who are sitting exams for the HSC (both trials in April and final exams during October and November).</p> <p>The stables will have openings for cross ventilation which will mean the noise suppression from animals will be quiet impossible. There is no mention of that in the report.</p> <p>Acoustics report deals with construction noises in detail but only very brief mention of acoustic balustrade on ramps and some noise reduction strategies for plant & equipment.</p> <p>Barriers and Fencing</p> <p>The recommendations of the NIA regarding the provision of an acoustic fence and barriers have not been addressed in the architectural drawings. The proposed style of fencing appears to have minimal</p>	<p>The horses will likely be asleep at night so noise impacts should be minimal. The introduction of the tie-up area near the track access point for morning trackwork shielded by the buildings will help minimise early morning noise to residents.</p> <p>Consultation with the School to determine appropriated construction times during exam periods should occur.</p> <p>Utilising a mechanical ventilation opposed to a natural one would generate machinery noise as part of constant operation.</p> <p>The Noise Impact Assessment outlines acoustic measures in section 4 including acoustic fencing for the horse ramps as well as recommendations for plants and equipment.</p> <p>The acoustic fencing and barriers are shown on the amended Architectural Plans. The proposed fencing responds to Council requirements for</p>	<p>Noise Impact Assessment, Amended Architectural Plans</p>

ISSUE	RESPONSE	REFERENCE
<p>to no acoustic benefits at all. Why can't there be an acoustic fence surrounding the entire perimeter, not just a small section?</p> <p>Sound reducing boundary fencing is proposed but what about sound reducing material in the stables themselves?</p> <p><u>Compensation</u></p> <p>Would NJC provide a subsidy/allowance to provide minimising improvements to the front of houses?</p>	<p>streetscape design. Having acoustic fencing surrounding the entire site would not meet the requirements of the relevant planning controls.</p>	
<p><u>Traffic Noise</u></p> <p>Road noise is already unacceptable at all hours of the night, particularly 3am-6am with loud heavy trucks/trailers banging around. The increased traffic would make it nigh on impossible to have a good nights sleep.</p> <p>There is no mention of car arriving at early hours of staff/individual businesses which will be engaged on taking care of 560 horses.</p>	<p>The amended Noise Impact Assessment confirms that delivery or pick up will not occur between 10:00pm and 7:00am.</p> <p>Further, as this proposal is a replacement training facility that is positioned at the track access, early morning floating and associated traffic movements are no longer required. As such, some 27 heavy vehicles will no longer enter and exit the site from Chatham Street.</p> <p>The Noise Impact Assessment, Traffic Impact Assessment, and EIS all mention the 3:30am start for the business and is deemed this appropriate for the use of the site, and is unchanged from the existing scenario.</p>	<p>Noise Impact Assessment, Traffic Impact Assessment, EIS</p>
<p><u>Stable Noise</u></p> <p>How will 520 horses in stables at night, 2 stories tall not represent a significant noise risk to nearby neighbours? How will this risk be eliminated in the middle of the night?</p> <p>In the acoustics report there is no mention of horses and noise generated by the activities of horses walking on metal ramps and concrete surfaces e.g. horseshoes striking the suspended floors of concrete/ metal surfaces of first floor at 3am in the morning.</p> <p>No mention of animal noise, such as horse neighs, groans, snorts, roars and screams etc.</p>	<p>The horses will likely be asleep at night so noise impacts should be minimal. The amended proposal now only provides for up to 480 horses not 520.</p> <p>The Noise Impact Assessment and EIS both mention the potential noise source from the ramps.</p> <p>Tables 8, 9 and 10 of the Noise Impact Assessment references assessment of horse noise in decibels.</p>	<p>Noise Impact Assessment, EIS</p>
Visual Impact		

ISSUE	RESPONSE	REFERENCE
<p>Given the bulk of the structures, the proposed set-backs from Chatham Street are inadequate.</p> <p>The signage tower proposed for the corner of Chatham Street and Darling Street is entirely out of character with the residential nature of the area.</p>	<p>The proposed setbacks are greater than those of the two storey dwellings along Chatham and Darling Streets by some 2.5m along Chatham street and even greater again from Darling Street. The provision of landscaping will further reduce the bulky appearance.</p> <p>As outlined above, the area is not purely of a residential nature.</p>	
Traffic, Access and Parking		
<p><u>Traffic</u></p> <p>The proposal will result in significant additional traffic on local streets.</p> <p>The local road network (especially Chatham Street) was not intended to carry heavy vehicles such as semi-trailers. Such large vehicles are not appropriate on residential streets and create significant road safety concerns. This is especially so in light of the close proximity of schools, childcare centres, and other community facilities. The road safety risks involved with heavy vehicles will be exacerbated by the increasing levels of densification and associated traffic flows along Brunner Road and Glebe Road.</p> <p>With this proposal basically all traffic comes onto Darling Street.</p> <p>The Report focuses on the intersection of Darling and Chatham Streets, but ignores other significant traffic flow in the vicinity. There is no mention of the location of a major institution which influences the amount of traffic on Chatham Street and the busy corner where it intersects with Darling and Melville Streets.</p> <p>Merewether High School generates considerable traffic, particularly during the hours 7.30 to 9.30 am, and 2.30 to 4.30 pm, which are also busy times for horse floats, and other large vehicles entering and leaving the racecourse. As a regional high school, Merewether High has a considerable number of special school buses during the morning and afternoon peak hours. There is no evidence in their letter that SECA solutions surveyed these bus movements. Also, two pre-schools located on the racecourse site generate a large volume of traffic within these hours.</p> <p>Significant concerns for the exit point on Darling Street which presents a massive blind spot.</p>	<p>The reduction in horses to 480 will lower the anticipated traffic movements.</p> <p>As this proposal is a replacement training facility that is positioned at the track access, early morning floating and associated traffic movements are no longer required.</p> <p>The flow of traffic is spread across Darling and Chatham Streets, not just Darling.</p> <p>The intersection of Chatham and Darling Street is the same intersection with Melville Road which is considered within the Report.</p> <p>The peak traffic movements generated by the proposed development do not coincide with the educational establishment's peak traffic times.</p> <p>The proposed traffic arrangements were found to provided safe and efficient movement of vehicles to and from the site.</p>	<p>Traffic Impact Assessment, EIS</p>

ISSUE	RESPONSE	REFERENCE
<p><u>Vehicle Access</u></p> <p>Given the size of the complex of the NJC it is suggested that other access points be explored to minimise the heavy traffic on Chatham Street and impacts on safety of the school.</p> <p>The proposed horse loading/unloading area is not large enough to accommodate the number of transport vehicles that will be loading/unloading horses. There is potential for queuing and congestion on Chatham Road with trucks, engines idling waiting their turn for entry.</p> <p>There is an issue with the gutter crossings in Darling Street as most vehicles bottom out when exiting and trucks stop and engage a lower gear, making noise.</p> <p>Lights are a major problem when vehicles exit. The NJC acknowledged the issue some years ago and directed all vehicles out via the exit in Chatham Street when night events were held.</p> <p>The proposed size is disproportionate to the availability of access roads in a quiet residential area for large volumes of heavy vehicles. The road surface is already suffering due to heavy vehicle use with many upgrades needed. The increase in volume of traffic to transport horses, food and waste (tonnes of manure) has not been clearly outlined in the DA and how to manage this traffic volume has not been addressed. Currently even with ample space to park in the facilities, trucks continue to park on Darling and Chatham Streets.</p>	<p>As a result of this proposal, some 27 heavy vehicles will no longer enter and exit the site from Chatham Street. This will enhance road and pedestrian safety in the area.</p> <p>The new access points and guttering shall be designed in accordance with Australian Standard to prevent this issue in the future.</p>	<p>Traffic Impact Assessment, EIS</p>
<p><u>Parking</u></p> <p>The report does not attend to loss of parking due to the development of the site.</p> <p>The report underestimates the number of vehicles arriving each day. Assuming full capacity of 520 horses, as per the Operation & Waste Management Plan, there would be 152 in total.</p> <p>The traffic report does not take into consideration the 190 strong staff which will commence work at 3am. Where will they park their cars?</p> <p>The parking assessment for peak days (race days) is inaccurate in that it has utilised capacity from the Future Stage 1 and 2 Carparks to show that an acceptable level of on-site parking will be maintained. Given there is no current Development Application for these carparks. It is not valid to include these spaces in the assessment. The location of the Stage 2 Future Public Carpark as</p>	<p>The revised proposal now provides for overflow parking in the infield area with access off Chatham Street near the maintenance shed when required on busier race days such as The Hunter and Newcastle Cup. This will have an expected capacity of roughly 200 vehicles. Traffic controllers will be present to direct vehicles and a shuttle bus will carry racegoers to the entrance. This will reduce the impact on local street parking.</p> <p>An additional 40 formalised spaces are provided under the amended proposal in front of the admin building.</p>	<p>Traffic Impact Assessment, EIS</p>

ISSUE	RESPONSE	REFERENCE
<p>indicated in the Precinct Plan, is located at the site of the existing Childcare Centre and may not be potentially feasible due to the high demand for childcare services in the Newcastle LGA.</p> <p>There has been no consideration to the availability of parking during construction.</p> <p>Race patrons seeking on-street parking spaces further away from the racecourse will create a need for additional infrastructure such as safe and accessible pathways and street lighting.</p> <p>There are very active seasonal sporting fields (Darling Street Oval and Myers Park) adjacent to NJC site that bring large volumes of traffic to the area, which do not appear to have been considered.</p> <p>The northern side of Darling Street is designated parking i.e. taxi and bus zones for race days. This was not dealt with in the EIS.</p>	<p>The amended proposal provides an increase in staff car parking up to 121 spaces and 6 motor bike spaces and as such will not require on street parking.</p> <p>Both the EIS and Traffic Impact Assessment reference the taxi and bus zones on Darling Street. The amended proposal shows the extent of taxi and bus zones on Event Days.</p>	
<p><u>Pedestrian Access</u></p> <p>The report on traffic flow makes no mention of the considerable bicycle traffic in the peak hours. Hundreds of students cycle to this school and to others close by, but they have not been considered. The mix of cycles and large trucks on busy roads is a very dangerous one and there are no dedicated cycle ways for cyclists to use, so they have no alternative to using the busy roads.</p> <p>There is currently no marked pedestrian crossing from the racecourse side to high school side of Chatham Street where many students cross during the morning and afternoon peaks. Traffic flow is impeded by those crossing as well as the great risks of serious accidents to the pedestrians. Those who attempt to cross are at the mercy of the heavy traffic, including horse floats. Such major concerns of safety have been ignored in the report.</p> <p>During the construction period there will be a need to ensure access is available for pedestrians and cyclists using the footpath on the racecourse side of Chatham Street. During the morning and afternoon peak periods this path and verge has a continuous flow of students entering and leaving the school premises.</p> <p>The development underestimates the amount of foot traffic that passes along Chatham Road and Darling Street even on non-race days. There is a large public housing community between the racecourse and Glebe Road and residents will often walk either down Beaumont St or Chatham Rd. A lot of locals walk around the racecourse daily. Plenty of high school students pass along Chatham</p>		<p>Traffic Impact Assessment, EIS</p>

ISSUE	RESPONSE	REFERENCE
Rd footpath, some on foot, some riding bicycles or scooters. Pedestrians and racecourse staff need to be able to walk across entry and exit driveways safely and be very visible when doing so.		
<p>Other</p> <p>The development has not considered the availability of drop-off/pick-up areas within the site for use by alternative transport operations such as Taxi, Uber, and the like. Similarly, no provision has been made for bus/coach parking.</p> <p>The new public entry appears to be secured. Emergency management vehicle access for ambulance, police and fire services is required to be considered as part of this proposal.</p> <p>“Proposed road closure is not expected to cause any traffic delays”. However, Appendix 3 “Pedestrian Detour Map” shows that part of the road on the NJC side of Chatham Street will be closed off to allow for construction and that pedestrians will be detoured onto the side of the road where cars would otherwise be parked.</p> <p>The existence of the school in proximity to the NJC has not been recognised in this proposal.</p>	<p>Taxi and bus zones are indicated on the amended Architectural plans.</p> <p>Appendix 3 deals with pedestrian detour not vehicle. The other side of Chatham Street is not identified as a place heavily utilised for on street parking on a typical day.</p>	Architectural plans
<p>Potential Alternatives</p> <ul style="list-style-type: none"> During construction provide off-site parking with buses to transport patrons to and from the venue Reduce the development size (i.e. number of stables), this would increase the area available for parking Include the development of the Stage 1 carpark in this proposal, so that the additional 303 carparks are available at the time of construction completion Remove only the residential property, leaving the Rumpus Room Childcare Centre During construction, NJC should provide “Park & Ride” style bus transport and off-site parking (potentially from McDonald Jones Stadium for example) 	As stated in the EIS and Operation & Waste Management Plan, the size of the development reflects expected growth and demand. Regardless, the amended proposal provides for overflow parking in the infield area during busier race days.	EIS, Operation & Waste Management Plan
Ecological Impacts		

ISSUE	RESPONSE	REFERENCE
<p>The site has lost numerous mature trees with the day stable development and there are concerns that more trees are going to be lost. There is a nesting tree at the western end of Darling Street. It is home to Lorikeets and Galahs each season and its removal will harm them. This tree must stay.</p> <p>There is an ecosystem that exists in the grass of the existing carpark. In flood the frogs can be heard, and large flocks of Carellas and pink cockateels can be seen benefiting from this wetland. The large gum trees along Darling Street are also home to existing wildlife.</p> <p>There is no written consideration for the existing ecosystem in this plan.</p>	<p>Significant replacement planting is proposed with the potential to improve biodiversity on the site.</p> <p>Due to the locality of the proposal within an urban context, it is unlikely that the hollows available provide preferred habitat for any threatened species which may occur in the area.</p> <p>The removal of these trees as a result of the proposal cannot be avoided.</p> <p>Both the EIS (section 6.8) and Arboricultural Impact Assessment give consideration of the existing ecosystem.</p> <p>A Biodiversity Development Assessment Report (BDAR) waiver was issued by Biodiversity Conservation Division.</p>	<p>EIS, Arboricultural Impact Assessment</p> <p>BDAR Waiver Report</p>
<p>Potential Alternatives</p> <ul style="list-style-type: none"> Commissioned Arborist to liaise with local residents to confirm specific nesting trees and ones to be removed 	<p>The Arboricultural Impact Assessment prepared by a qualified Arborist already identifies nesting trees and habitats on site</p>	<p>Arboricultural Impact Assessment</p>
Pests		
<p>No suitable mitigation has been stipulated, acknowledged or addressed satisfactorily with regards to flies, rats and cockroaches including the increased likelihood of disease.</p> <p>While the Operational and Waste Management Plan includes information which relates to pest management, the specific pest management recommendations (prepared by Advanced Pest Control) seem quite limited. The one page letter does not stipulate the qualifications of the underwriter.</p> <p>The EIS and Pest Management Plan does not address the risk of flies and mosquitos at all.</p> <p>There needs to be regular inspections by authorities to ensure the pest management plans are adhered to.</p>	<p>The amended Operation and Management Plan provides further pest control measures under section 5 including ongoing and regular inspections by a suitable pest control company and a complaints handling procedure.</p> <p>Advanced Pest Control employs HACCP (Hazard and Critical Control Points) trained technicians.</p> <p>The amended Operation and Management Plan considers the risk of flies and mosquitoes.</p>	<p>Pest Management Plan, EIS, Operation & Waste Management Plan</p>
<p>Potential Alternatives</p>		

ISSUE	RESPONSE	REFERENCE
<ul style="list-style-type: none"> Redevelop current stables site with updated Pest Management Plan and new facilities including mechanical air-filtration and extraction system 	<ul style="list-style-type: none"> As stated above, in the EIS, and in the Operation and Waste Management Plan, the current stable site is deemed not sufficient to meet the expected growth 	EIS, Operation & Waste Management Plan
Negative Impacts of the Horse Racing Industry		
<p>Horse racing is an industry in decline and should not be supported to grow.</p> <p>The industry encourages and profits from excess alcohol consumption and gambling, therefore resulting in social and animal welfare concerns.</p> <p>It is horrible for the horses. The quality of life for these horses will be depleted in such a mass concentration style camp. Animals require space.</p> <p>Where will these horses go when they are deemed unfit for racing? What is the retirement plan for them? There has been no address of the training, exercise and hospitalisation/rehabilitation for healthy and injured horses.</p> <p>There is no outlined training or walking facility in the new plans.</p> <p>A major issue that has not been addressed is the spread of Equine flu in large capacity areas not to mention the existing COVID-19 virus which is also spread among animals. There is not mention of these measures in the current plans.</p>	<p>The Operation and Waste Management Plan and the submissions in support disagree that the industry is in decline and outlines how NJC is in fact expected to grow.</p> <p>The proposed development has been designed with best practice for horse welfare through consultation with industry experts, and is a significant improvement to the existing on course stable facilities.</p> <p>Numerous horse walkers are identified on the plans, being a significant part of this proposal.</p> <p>There is existing on-course vet facility on the site which can be used to isolate horses in the event that any horse presents as unwell.</p>	Operation & Waste Management Plan
Stormwater and Flooding		
<p>There is concern that the basins adjacent to Darling Street at the southern side of the development will attract and be prime breeding ground for mosquitos and flies if not maintained properly.</p> <p>Inadequate consideration has been given to the collection, treatment, and disposal of wash down and other contaminated water from the stables, wash bays, pool, and other likely sources in the proposed stable complex.</p>	<p>Per the Stormwater Report, basins should be inspected and maintained in accordance with the recommendations in "Bioretention Technical Design Guidelines" by Water By Design (October 2014).</p> <p>Per the Stormwater Report, there is a requirement for contaminated water from developed areas to pass through an appropriate pollution and sediment control system and meet the WSUD requirements of the NCC DCP.</p>	Stormwater Report

ISSUE	RESPONSE	REFERENCE
The removal of significant areas of soft surface and replacement with hard surface will reduce the capacity of the ground to absorb rainfall, increasing the risks of flooding in the area.	The hardstand areas are proposed to act as stormwater detention.	
Potential Alternatives <ul style="list-style-type: none"> Construct underground retention systems 	Underground retention not required.	Stormwater Report
Accessibility of the Submission Process		
<p>Several comments were made concerning residents having difficulty assessing the development information given their limited internet capabilities and size of the project. Some of the residents found the process very daunting and this may impact on the number of responses received.</p> <p>Requests were made for a far more technical friendly alternative for local residents (such as many of the elderly) to be able to digest a DA of this scale.</p>	<p>This is a matter for the Department to consider.</p> <p>The complexity of the reports and documents is a necessity of the assessment process and the stipulations setting out the required content of the accompanying reporting.</p>	
Other		
Miscellaneous <p>Are there going to be caretakers/staff living/staying on site in close proximity to new stables (separate to the present manager/caretaker residence)?</p> <p>What are the security plans once the project is completed?</p>	<p>No on-site caretakers accommodation is proposed.</p> <p>The proposed development will operate with appropriate security and access control measures in place.</p>	

In addition to the above, the following comments were made in support of the proposed development.

Table 4.3: Submissions in Support of the Proposed Development

SUBMISSIONS IN SUPPORT
Positive Benefits
<p><u>General Benefits</u></p> <p>This development is long-overdue. There are many short and long term benefits to the Newcastle community from this project.</p> <p>The proposed development is a critical piece in the puzzle to position Newcastle as a centre of regional racing excellence. This new structure will ensure racings future in the area and keep the Newcastle Jockey Club at the forefront of the industry.</p> <p>This is a fantastic opportunity for the NJC to create a world class equine facility in a regional area. It would also give the existing trainers based at Broadmeadow the opportunity to stay and train their horses at Broadmeadow without having to go to Sydney or other capital cities.</p> <p>Newcastle and the greater Hunter region is a vital element of the industry with a long and proud history of success on the racetrack. The proposed development will see this history guaranteed for future generations. It will be a great asset to Newcastle in general and Broadmeadow in particular.</p> <p>Newcastle Jockey Club have for over 100 years occupied the site at Darling/Chatham streets and have always been a responsible venue manager. The Club has been well managed and one can see competence and passion for the Club.</p> <p><u>Positive Benefits</u></p> <p>The new complex is very much part of the racecourse property and is far better located so as not to disrupt the surrounding community whose buildings located on Chatham Road have been there for decades, the residents of which have always lived with the racecourse as their good neighbour.</p> <p>The proposed development will have a net positive benefit to the natural, social and economic and built environment and is worthy of favourable consideration.</p> <p>Approval of the proposed stables will see significant improvements in the facilities and associated operations which will see more contemporary and efficient practices better aligned with State Environmental Planning legislation and various Regional planning tools. Examples of these improvements include:</p> <ul style="list-style-type: none"> • Greater traffic and access controls • A significant reduction in operational noise due to reduced truck movements at trackwork each day with the tracks and accesses adjacent to the proposed complex • Positive neighbourhood impact with reduced noise and activity impacts in all surrounding areas; and • Improved environmental impacts with opportunity for water capture and reuse, solar power harnessing and reduced dependence on road transportation

SUBMISSIONS IN SUPPORT

Further community and industry benefits would be evident in:

- The improvements in occupational work, health and safety conditions for all trainers and staff
- The provision of accommodation and infrastructure for thoroughbred horses that exceeds best practice guidelines for animal welfare
- The opportunity for NJC to generate significant employment opportunities across a range of roles including trainers, stable hands, track riders, farriers, fodder suppliers, float operators, maintenance staff, veterinary staff, track/grounds staff, float operators and administrative staff; and

Economic Benefits

The NSW racing industry is one of the biggest employers in the state and this new facility will be a boost for the racing industry and help generate employment. The thoroughbred racing industry provides significant direct economic and social benefits to the CN and to the wider Australian economy. Benefits include the economic impact for the local construction industry, employment opportunities from a larger complex, better amenity for the racehorses and another positive step to place Newcastle on the NSW and national stage as a "go to" place for horse racing. This project will further promote Newcastle as a location for significant racing events raising the potential for employment opportunities and related flow on effects associated with the overall strengthening of the thoroughbred racing industry in the Hunter region.

The economic multiplier benefit of a growing racing industry through increased revenues which contribute to state and commonwealth taxes, additional employment, further capital development and greater redistribution of prizemoney to the industry which benefits all participants.

With these facilities more investment can be attracted which in turn creates more income and financial benefit to Newcastle. These employment and economic benefits will occur within the Thoroughbred racing industry, but also within supporting industries such as feed suppliers, veterinarians, transport companies, hospitality services, cleaning and waste services among many others. Importantly, the vast majority of employment that will be generated from this development will be in low skilled labour roles. The proposed state of the art facilities will be of significant benefit to all of the associated shareholders who utilise the facilities - not the least being the trainers, breeders, jockeys and general supporters of Racing in NSW. The racing industry in Australia incorporates a diverse range of businesses including horse breeding/farming, horse racing (thoroughbred and harness), and management of the facilities used specifically for those activities. Such events will support further jobs creation in the hospitality and tourism sectors.

This facility will also attract other trainers to bring their horses to the area. It will bring owners out from Sydney for quality racing days to spend time and money here in Newcastle.

Improved Facilities

The current stable facilities on site are in a poor condition and below industry standard. The new stable structure merely replaces the existing antiquated facility. This new structure will ensure racing's future in the area and keep the Newcastle Jockey Club at the forefront of the industry.



SUBMISSIONS IN SUPPORT

The old and outdated buildings, stables and infrastructure need to be demolished and the beneficiaries of the new facilities should be afforded the opportunity to move into a safe and modern new facility. The current layout of Newcastle racetrack's stables is impractical and inefficient to train horses out of, and not without some significant safety issues.

The proposal will provide world class amenities for horses and employees and thereby improve animal welfare and occupational health and safety of staff. The mass numbers of pests and rodents that currently swarm the barns are not only severely unhygienic but harmful to our valuable horses, often floating in our horse's water trough in the mornings, along with chewing through wires, eating rodent poison and dying in horses' boxes.

The hygiene and pest control of the barn much more manageable to keep thereby reducing and managing the spread of germs, and viruses more efficiently. By being together in a larger barn, we will be able to keep moral high amongst our staff, create more of a team culture and again in return get better results to reach our full potential.

Environmental Benefits

Improved environmental factors/eco-friendly approach that will contribute to less air, water and land pollution.

The increased stabling capacity has direct amenity benefit to local residents through the removal of early morning horse transport, reducing noise impacts.

The proposal has the potential to improve environmental conditions through increased water and energy efficiencies and better waste management.

5. EVALUATION AND CONCLUSION

The proposed stables complex seeks to improve the capacity and quality of existing stabling and training facilities at Newcastle Jockey Club. The proposal will meet industry best practice standards and thereby improve animal welfare and occupational health and safety of staff. The proposal has the potential to improve environmental conditions through increased water and energy efficiencies and better waste management. Potential environmental impacts such as noise, air quality, heritage (Aboriginal and non-Aboriginal), traffic and tree removal have been identified and appropriate mitigation measures proposed.

The proposal will reduce early morning floating of horses to the site for training purposes as it is located with direct track access.

The facility is likely to generate direct and indirect benefits at both the construction and operational phases. Employment opportunities will be generated by the development. Flow on effects associated with the overall strengthening of the thoroughbred racing industry in the Hunter regional will support further jobs creation in the hospitality and tourism sectors of the local economy.

The proposed development will have a net positive benefit to the natural, social and economic and built environment and is worthy of favourable consideration.

Following submission and exhibition of Application No. SSD-12982045, DPE has issued the RTS package for all authority and public submissions received in regard to this application. This RTS Report summarises these responses and directs DPIE and other readers to the relevant document where each item has been addressed.

All matters raised in the RTS package provided by DPE have been addressed and are considered resolved.

DPE has now been provided with sufficient documentation to enable the assessment of SSD-12982045 to continue. It is requested that DPE complete the assessment of the DA and proceed to determination in the earliest possible time based on the assessment material provided in the original EIS and the supporting assessment material provided in this Report.



APPENDICES



APPENDIX 1

Architectural Plans - Revised



APPENDIX 2

Streetscape Renders - Revised



APPENDIX 3

Landscape Drawings – Revised



APPENDIX 4

Preliminary and Detailed Contamination Assessment – Revised



APPENDIX 5

Stormwater Management and Soil and Water Management Report - Revised



APPENDIX 6

Stormwater Management and Soil and Water Management Plan - Revised



APPENDIX 7

Operational and Waste Management Plan - Revised



APPENDIX 8

Traffic and Parking Assessment - Revised



APPENDIX 9

Turning Path Plans - Revised



APPENDIX 10

BCA Compliance Statement



APPENDIX 11

Noise Impact Assessment - Revised



APPENDIX 12

Air Quality and Odour Risk Assessment – Revised



APPENDIX 13

Preliminary Construction Management Plan prepared by Avid Project Management – Revised



APPENDIX 14

Statement of Heritage Impact prepared by EJE Heritage - Revised