



Application Name: Newcastle Jockey Club – New Stables Complex

Application Number: SSD-12982045

As the owners of  we **strongly object** to this proposal for the following reasons:

Air Quality / Odour

At the proposed stable capacity, 520 horses will produce an extraordinary amount of waste. Approximately 8.58 tonnes of faeces and 4,680 litres of urine per day. Which translates to an immense 11.793 tonnes of raw waste per day in faeces and urine combined!

According to the DA, the waste is to be collected by the trainers once per day and put in the sealed 780 litre ‘mega bins’ that are also used to transport hay onto the site for the horses.

The report suggests that at full capacity, 156 of these mega bins will be filled each and every day. That is a huge volume of bins to manage and contain.

So let's just say that the stables are at half capacity (260 horses), and the horses are only in their stables approximately 20 of the 24 hours of the day approx. (Yes, race horses spend up to 22 hours of the day in their stables!) Approx. 4.5 tonnes of fresh waste will be collecting on the floor of the stables over the course of the day, being cleaned up at various times.

With the proposed ‘Natural Ventilation’ system which appears to be a simple louvre style design, the prospect of significant odour blowing straight out of the stable windows over neighbouring homes and Merewether High School is very real. Not to mention the dust and potential microbiological matter.

This potential heightened health risk for local residents and students with respiratory issues will only be aided by the elevation of the proposed 2 story structures.

Also, the proposed stables are designed with louvres on the Northern & Southern elevations, with the predominant local winds blowing in a north-westerly direction (according to the AQR), residents on Darling St would regularly endure wind that has blown directly through the stables. Arguably carrying with it, dust, odour and potentially harmful microbiological matter.

The control measures proposed for odour and dust control in the EIS & AQR are inadequate and are too focused on the storage of the waste as opposed to the potential impacts of the stables ‘Natural Ventilation’ and waste bin logistics.

Potential Alternatives:

- Replace proposed natural ventilation system with a mechanical air-filtration and extraction system.

- 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.

Pests

The included Pest Management plan does not include Flies or Mosquitoes. From speaking with neighbours on Hibberd St, Hamilton South (whom live near the current stables), they have suggested that there is a long-standing MAJOR problem with flies and also odour from the stables.

Flies and also Mosquitoes need to be added to the current Pest Management Plan. It is very unsettling to observe an oversight as significant as this in the DA.

Potential Alternative:

- Redevelop current stables site with updated Pest Management Plan and new facilities including mechanical air-filtration and extraction system.

Parking

The parking assessment in the DA for 'Race Days' has utilised the capacity of Future Stage 1 & 2 carparks, these proposed carparks do not appear to have a current Development Application and therefore should not be included in this assessment.

There also has been no consideration on the availability of parking during the extensive construction phase of the proposed.

The DA's proposed parking plan including Future Stage 1 and 2 carparks will require the demolition of Rumpus Room Childcare Centre and also residential housing. Rumpus Room is arguably one of the most sought after and well-respected childcare centres in Newcastle with its unique large outdoor play & learning areas made possible by the fact it's a re-purposed Bowling Club. Large outdoor spaces at Childcare Centres are immensely influential on a child's development, experience and inspiration. Retaining and nurturing these rare large outdoor spaces is critically important for our children and future. Replacing this Centre with a carpark would be a great and irreplaceable loss for Newcastle.

Note, 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, this does not appear to have been considered in the plan. The proposed DA will reduce 'Race Day' patron parking by approx. 60%, this will only add

further pressure to the already challenged street-side parking options on mentioned sporting days. This will be at the cost of local residents.

Potential Alternatives:

- Reduce the size and footprint of the Stables development, leaving more available car parks.
- Remove only the residential property, leaving the Rumpus Room Childcare Centre.
- During construction, NJC to provide "Park & Ride" style bus transport and off-site parking. Potentially from McDonald Jones Stadium for example.

Stable Design / Heritage

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.

I would also like to point out, the Comparable Development examples (Appendix D, page 17 of the Stable Pre-Lodge Doc) is relative to factory farmed pigs and chickens, in that the horses will spend up to 22 hours per day in their stables. This is the sad reality of a racehorse living in stables such as the proposed.

One can't help but feel that this is TOTALLY inappropriate potential positioning right next to a high school and residential area. Especially with the scope of a MASSIVE 520 horse capacity.

A stable facility of this size is more suited for an industrial area. Even if at half of the proposed capacity I believe the stables in this location with its proximity to Merewether High School and local residents are inappropriate.

Potential Alternatives:

- Decrease stable development size to single story with further setbacks from neighbouring homes and Merewether High School. Concealed behind proposed trees and landscaping.
- Redevelop current stables site with more appropriate state of the art facilities
- Build new stables facility in a suitable local industrial area.

Tree Removal

The DA proposes the removal of a large nesting tree positioned on the western end of Darling St. This tree is seasonally relied upon by both native Galah's and Lorikeets and should NOT be removed. Trees like this are critical to our cherished native birds.

Potential Alternative:

- Commissioned Arborist to liaise with local residents to confirm specific nesting trees and remove from the 'chopping list' so to speak.

Summary

I can appreciate NJC's logic in wishing to utilise their land for the proposed stables development, (reducing the need for trucking horses from stables to the track, improving current facilities etc) however, the scale, scope and potential impact on the local residents, school children and teachers alike, is far too significant.

[REDACTED] I don't feel that we have truly been considered/valued in their DA. Several gross oversites have been made.

I would also like to point out that digesting this proposed DA with it's numerous links and hundreds of pages of reports was very difficult. Even with my 27" IMac and being quite tech savvy, it was a task. The scale of the DA was quite intimidating. I have personally spoken to several of my neighbours who quite simply were unable to get their heads around it all. Or, it immediately fell in the 'too hard' basket, especially for those without computers, only phones. I believe this will be of great influence in the number of objection letters you receive. Potentially very few for a neighbourhood of this size.

I believe there should be 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. I personally found it VERY taxing to work through all the information.

My wife & I strongly urge you to consider the above points and reconsider, the size, scope and potential impact of this development. In particular, the air quality, pest and parking issues raised.

Regards,

[REDACTED]