



22 July 2022

Mr Christopher Eldred
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

RE: NEWCASTLE JOCKEY CLUB STABLE DEVELOPMENT (SSD-12982045)
RESPONSE TO REQUEST FOR FURTHER INFORMATION DATED 14 JUNE 2022

Dear Mr Eldred,

Our response to your request for further information is outlined below:

1. Response to Submissions

We comment on each item raised by City of Newcastle (CN) in their letter dated 10 June 2022 below:

- A. Strategic Planning:
 - i. Note only. No response required.
- B. Streetscape / Visual Impact:
 - i. It is noted that this item has been satisfactorily addressed.
- C. Flood Management:
 - i. It is noted that this item has been satisfactorily addressed.
- D. Stormwater Management:
 - i. Please refer to the correspondence from MPC Consulting Engineers attached, which address items 4.1 and 4.2 of the CN letter.
 - ii. In item 4.1, CN note that the MPC revised Stormwater contend that the submitted stormwater philosophy is similar to that used at the existing stables complex located on land in the south-eastern corner of the Racecourse. CN then completed a desktop analysis of the development consent (DA2008/1239 17 February 2009) and construction certificate documents for the stables complex. This is incorrect. In their Stormwater Report, MPC refer to the recently constructed Race Day Tie-up Stalls (development consent DA2019/01082, which was approved by Hunter Water via the Section 50 Certificate reference 2019-1295.003), and the design principles have been followed accordingly.

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Hunter Water have again been consulted for the proposed stables development, and a Notice of Formal Requirements has been issued which will need to be satisfied prior to a construction certificate being issued for the project. A copy of the Notice of Formal Requirements was provided with the Environmental Impact Statement, and is attached again to this letter (Hunter Water reference 2021-1123). Item 2 of the Notice of Formal Requirements notes that the *“proposed development has been identified as having the potential to discharge trade waste into Hunter Water’s sewerage system”*, which relates to the horse waste being discharged to sewer. Newcastle Jockey Club’s (NJC) existing trade waste agreement with Hunter Water will be amended to cater for the stables development to satisfy this requirement.

E. Traffic Management:

- i. Please refer to the correspondence from MPC Consulting Engineers attached, which confirms that additional turning path checks using a 19m semi-trailer and the proposed roundabout geometry supplied by CN have been carried out. The roundabout appears to work for the 19m semi-trailer movements provided that the outer “apron” in the middle of the roundabout is mountable (i.e. only 50mm higher than the asphalt surface). The proposed roundabout does not appear to interfere with the truck paths entering or leaving the NJC site.
- ii. The architectural drawings have been updated to reflect the portion of the site requested by CN to be dedicated as road reserve via a Voluntary Planning Agreement.
- iii. Details of CN’s proposed Voluntary Planning Agreement would need to be discussed and agreed between CN and Newcastle Jockey Club. As discussed in the meeting held with CN on 16 March 2022 (and as noted in the Response to Submissions), CN’s request for a roundabout seems to be due to the extent of current and future development generally in the Broadmeadow / Adamstown area, and is not specific to the proposed stables development. Accordingly, NJC should not be responsible for costs associated with any land dedication, including but not limited to surveying fees, legal fees, valuation fees, registration fees and the like. It is anticipated that CN and NJC can resolve this matter after the development consent is received.

F. Parking Demand:

- i. On Street Parking:
 - a. The Architectural site plan A05 Rev D submitted with the RtS documents the event day taxi / rideshare zone in a blue dotted line on Darling Street, and the event day bus zone in a green dotted line on Darling Street. Both zones are in the same location as the existing scenario and are considered adequate.
 - b. CN’s comments about any necessary changes to on-street parking requiring separate approval under Section 138 of the Roads Act 1993 are noted, and the draft condition C9 is acknowledged.
- ii. Horse Transportation Parking Demand:
 - a. It is noted that this item has been satisfactorily addressed.



- iii. On-Site car parking:
 - a. The RTS and revised Traffic and Parking Assessment note that there are very few race days per year where patron parking may require additional on-site parking, such as the Newcastle Cup (in September), and The Hunter (in November). For those race days, the infield of the racecourse can be made available to properly cater for patron parking on the property. Refer to RTS Page 25 “Off street car parking provisions” and Page 46 “Parking”. Particulars of logistics can be further developed with the Event Management Plan and associated consultation, which CN have considered with their draft condition C8.
 - b. While 40 formalised sealed car parking spaces have been documented in front of the existing Administration building to formalise the existing carpark, the existing scenario of using the remaining grassed areas on race days, and formalising these areas by placing markers in the grass and ensuring adequate traffic management is provided on site is described in the Traffic and Parking Assessment, and is documented on Architectural drawing A03. This extent of formalised grassed parking accessed from Darling Street, combined with proper traffic control, is anticipated to satisfy the vast majority of race day car parking requirements.
- iv. Motorbike Parking:
 - a. It is noted that this item has been satisfactorily addressed.
- v. Bicycle Parking and End User Facilities:
 - a. It is noted that this item has been satisfactorily addressed.
- vi. Disabled Parking Provision:
 - a. It is noted that this item has been satisfactorily addressed.
- vii. Emergency Management:
 - a. It is noted that this item has been satisfactorily addressed.
- G. Pedestrian movements and Event Transport Management Plan:
 - i. CN’s draft condition C8 is noted to satisfy this item.
- H. Vehicular Access, Driveway Design and Crossing Locations
 - i. Gate Setback:
 - a. Gates have now been set back for the Chatham Street driveways as far as possible as requested by CN to mitigate the risk of vehicles blocking the road carriageway. Gates need to be sliding rather than hinged, such that internal space in the Pick up / Drop-off Zones are maximised.

For the Equine & Goods Drop off / Pick up Zone, the gates will be positioned approximately 5m back from the boundary, and in the open position will slide against the western wall of the Goods Storage Shed and Site Office.



For the Maintenance Drop off / Pick up zone, the gates will be positioned approximately 4m back from the boundary, and in the open position will slide into the landscaped area to the south, and against the outside running rail of the track to the north.

The gates for the Equine & Goods Drop off / Pick up Zone and Maintenance Drop off / Pick up zone are to be secured at all times to ensure that the facility is secured in the unlikely event that a horse becomes loose, to prevent it from entering the road reserve. Deliveries and pick-ups are to be booked in advance with NJC management, who will open the gate on arrival.

The fence gates to the staff carpark have now been deleted, as they are not required for equine safety. Additionally, the fence and gates would prevent Ausgrid obtaining access to the substation for maintenance purposes at the staff carpark.

Refer to the attached updated Architectural plans showing the revised gate positioning, and the Operation and Waste Management Plan (Section 4) providing further information on the security and management of the gates.

It is requested that CN's draft condition A2 be amended accordingly.

- ii. Chatham Rd Maintenance Drop-Off Driveway:
 - a. Please refer to the letter from MPC Consulting Engineers attached, which provides a response demonstrating that the driveway does not need to be moved further north.
- iii. Turning Path and Internal Manoeuvring:
 - a. Please refer to the letter from MPC Consulting Engineers attached, which addresses this item and provides further clarity on the intent for the internal manoeuvring, which is only required for very occasional float access to retrieve any injured horses.
- iv. Staff Carpark design
 - a. It is noted that this item has been satisfactorily addressed.
- I. Public Domain
 - i. Refer to the comments above in item E iii regarding CN's proposed Voluntary Planning Agreement.
- J. Street Trees
 - i. CN's comments are noted, and the draft conditions appear reasonable in relation to this item.
- K. Heritage
 - i. CN's comments are noted. It is agreed that the positioning of the octagonal horse trough can be dealt with by an appropriate condition of consent.



- L. Pest Management
 - i. It is noted that this item has been satisfactorily addressed.
- M. Wastewater Management
 - i. It is noted that this item has been satisfactorily addressed.
- N. Noise Management
 - i. It is noted that this item has been satisfactorily addressed.
- O. Odour Management
 - i. It is noted that this item has been satisfactorily addressed.
- P. Signage
 - i. It is noted that this item has been satisfactorily addressed.
- Q. Section 7.12 Development Contribution Plan
 - i. CN's comments are noted.

2. Architectural Plans

Revised Architectural plans are attached to this letter, which show how the proposed signage will be positioned in relation to the revised boundary post acquisition.

3. Vehicle Turning Paths

The letter from MPC Consulting Engineers explains the reasoning for swept path analysis demonstrating vehicle movements between the upper and lower concourses being for very occasional float access to retrieve an injured horse for transportation off site. It is envisaged that this may occur once or twice per year at the most.

4. Stormwater Discharge

Please refer to the comments in item 1. During the detailed design period of the project, hydraulic drawings will be prepared that will demonstrate appropriate discharge of wastewater to the sewerage system. A construction certificate for the project will not be issued until the design has satisfied Hunter Water's Formal Requirements, and a Compliance Certificate has been issued by Hunter Water in accordance with Section 50 of the Hunter Water Act 1991.

CN's draft condition A18 will satisfy this requirement.

5. Traffic Impact Assessment

Refer to the attached letter from SECA Solution providing further clarity on the queries raised. Additional comments are made against each item below:



- A. Horses are not expected to be floated in each day from off site for trackwork each morning, as once the facility is completed and occupied, there is no capacity anticipated for additional off-site horses using the training facilities. As noted in the EIS and RtS, this is one of the main benefits for this development, as it significantly reduces the current morning floating requirements.
- B. As horses are not expected to be floated in each morning from off site for trackwork, drivers have not been considered in the staff numbers.
- C. Refer to the letter from SECA Solution attached providing clarity on the projected level of vehicular use for each access point.
- D. Trackwork occurs as normal on a race day, albeit with reduced numbers. Being an early morning activity, training operations are complete before race day traffic commences.
- E. Refer to the letter from SECA Solution attached providing clarity on Table 1 of the Traffic Impact Assessment.
- F. Refer to the attached updated Architectural plans which indicate the proposed area to be used for infield parking on busy race days.
- G. The total 161 car spaces will be available for staff carparking each morning.

6. Preliminary Construction Management Plan

- A. The Preliminary Construction Management Plan (PCMP) and Preliminary Construction Traffic Management Plan (CTMP) has been updated to address the following:
 - i. Provision of indicative peak traffic volumes arising during construction works. Refer to Section 6.00 of the PCMP.
 - ii. Further reference and diagram showing available parking for construction workers on site. Refer to Section 6.00 of the PCMP.
 - iii. Extended routes to demonstrate paths that vehicles will take to the closest collector roads (awaiting Gateshead input / updated routes). Refer to the additional diagrams provided in the updated CTMP, which is appended to the PCMP (the last three diagrams).

7. Noise Impact Assessment

- A. The acoustic engineer has reviewed the report, and has found that the distances in Tables 9 and 10 were accidentally input into the report incorrectly, and came from the calculations to Receiver R4 to the south.

The acoustic engineer has now corrected the distances in Tables 9 and 10 to reflect the correct distances that were used in the calculations, and has confirmed that the summary impacts in Table 11 remain unchanged as only the distances were copied from the incorrect location in the acoustic model and not the resultant noise impacts.



The updated Noise Impact Assessment is attached, with distances corrected in Tables 9 and 10.

8. Air Quality Risk Assessment and the Operational Waste Management Plan

- A. Due to horse bedding now being a scarce and costly product, it is intended that soiled bedding only is removed on a daily basis. Hosing down the stables on a daily basis will cause the remaining clean bedding to get wet, causing it to be unusable and thus adding unnecessary waste and expense to the daily maintenance operations.

Each occupied stable will still need to be washed down to ensure air quality and odour issues are avoided. Washing down of stables will occur on a monthly basis (typically when a horse is either off site spelling, or racing at another racecourse).

The main breezeways of each stable will be hosed down on a daily basis, and thorough cleaning of surfaces using pressure washers will occur on a periodic (6-monthly) basis.

The Air Quality Risk Assessment has been updated to reflect the description above (refer Table 17), and the Operational Waste Management Plan has been updated to reflect the cleaning measures for consistency. Both updated reports are attached (Refer Section 4).

Should you require any further information, please do not hesitate to contact us.

Yours Faithfully,

AVID PROJECT MANAGEMENT PTY LTD

David Read
Director