



29 August 2024

**Via website:** <https://majorprojectsplanningportal.nsw.gov.au/>

Minister for Planning and Public Spaces  
Department of Planning, Housing and Infrastructure  
4 Parramatta Square, 12 Darcy Street  
Parramatta NSW 2150

Dear Mr Hearfield

**RE: Port Macquarie-Hastings Thrumster Wastewater Scheme - State Significant Infrastructure Project - Application Number: SSI-56980459**

I refer to the above-mentioned matter and write for the Port Macquarie Race Club ('the Club') who lodges a submission in relation to the proposed Port Macquarie-Hastings LGA State Significant Infrastructure Project named the Thrumster Wastewater Scheme project.

The Club is the lessee of the Crown Land, located at 283 Oxley Highway, Port Macquarie, and is responsible for the administration of racing and training of thoroughbreds from the facility. Further, the Crown Land is a valuable public asset that provides social, environmental and economic benefits to the local and broader community and it is the PMRC responsibility to closely manage the assets to ensure this public place is safe and fit for purpose.

The purpose of the submission by the PMRC is to address several concerns identified by the Club in relation to the State Significant Infrastructure - Thrumster Wastewater Scheme Project. The Club understands the needs for the project, however, the ramifications produced by the current design will deliver exorbitant consequences to not only the Club, but racing participants in the Mid North Coast, members of the PMRC, potential users of the facility as a function venue, patrons and the general public.

#### **Areas of Concern**

The submission on behalf of the PMRC will discuss the following four areas of concern:

1. The notification & consultation process with the Port Macquarie-Hastings Council and associated contractors
2. The location and associated infrastructure of the upgraded Sewer Pump Station (SPS 29)
3. The alignment of the Sewer Rising Main and Sewer Gravity Main
4. Associated concerns with development near a thoroughbred training/racing facility



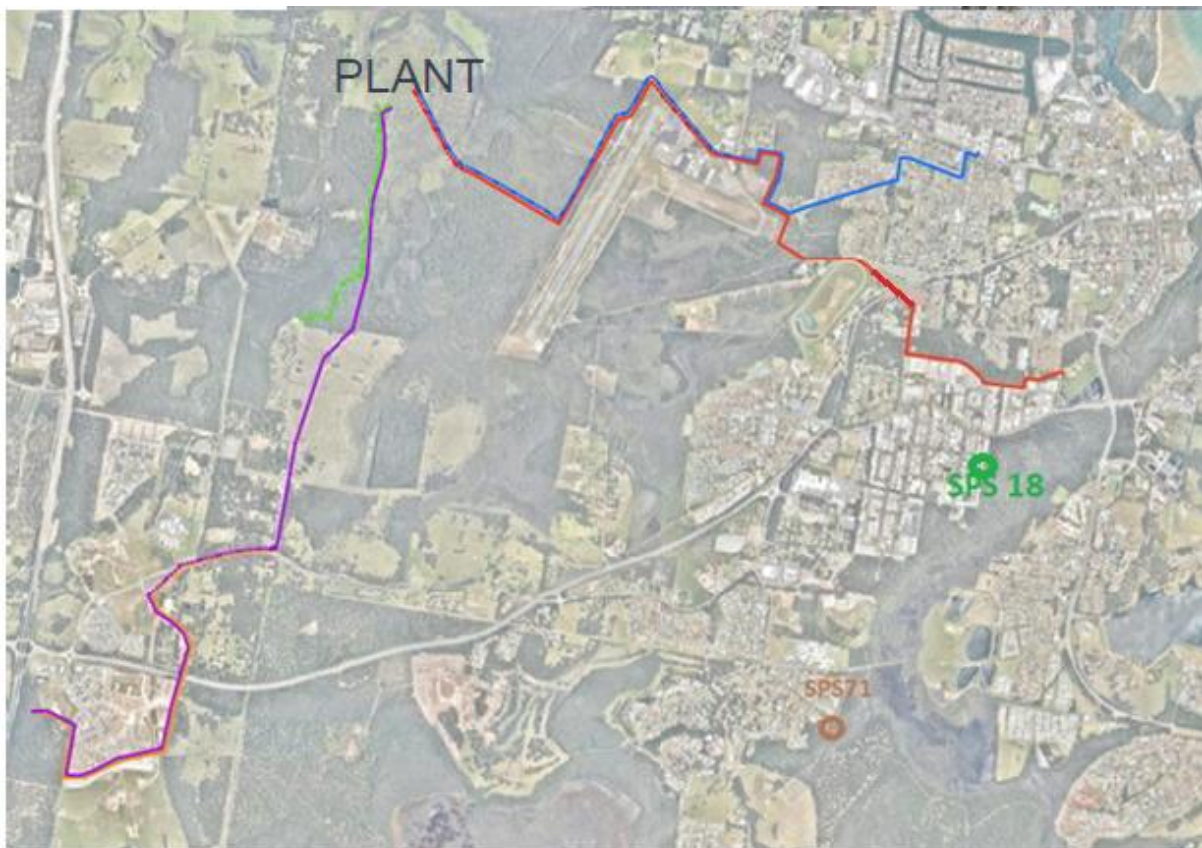
Following the addressing of the four areas of concern, this submission will highlight the importance that the PMRC and its facilities play in the local Port Macquarie region providing social, environmental and economic benefits that are incalculable.

### **Notification and Consultation Process**

The PMRC was first contacted by Port Macquarie-Hastings Council ('PMHC') on Wednesday 8<sup>th</sup> June 2022 via email. This email correspondence was an introduction email and informed the Club of the proposed project.

Subsequently, a meeting was conducted on Monday 4<sup>th</sup> July 2022 between the former PMRC CEO Michael Bowman and representatives from the PMHC.

At this meeting, Mr Bowman was presented with an Inception Meeting document prepared by Dr Ali Ranjbar in May 2022. This document outlined the proposed schedule of works which prima-facie centred around the area to the north of the precinct near Lady Nelson Drive. These works appear to be associated, by the most part, to the proposed upgrade to the Pump Station (SPS 29).



*Figure 1: 2022 Map from Inception Meeting Document*



Upon review of this document, Mr Bowman responded with some feedback, only relating to the area north of the precinct. This is further noted in Appendix C – Community Engagement Table of the Environment Impact Statement ('EIS') with the reference to Port Macquarie racecourse.

Since this time, Mr Bowman has retired from his position. From the 5<sup>th</sup> of July 2022 to 15<sup>th</sup> of July 2024, there is no evidence of further correspondence or communication from the PMHC in relation to this Project.

The next correspondence received by the PMRC was on Monday 15<sup>th</sup> July 2024. A few weeks after this correspondence, the PMRC noticed that surveyors had been on site and physically flagged areas of future proposed works without any prior communication with the PMRC.

Since this time, we have been briefed partially of the scope of works, which has changed since initial discussion in July 2022, and somewhat, the effect the scope of work will have on the racecourse land. This included a site-walk with the PMHC on Friday 23<sup>rd</sup> of August 2024 where Club representatives presented some alternative solutions to the alignment of the Sewer Mains.

It appears that by not being consulted, we have not been taken into consideration when planning and viable options were being discussed for the racecourse land.

#### **Location & Associated Infrastructure of the Sewerage Pumping Station (SPS 29)**

During the forementioned meeting with representatives of the PMRC and PMHC at the racecourse on Friday 23<sup>rd</sup> August 2024, the location and size of the proposed Pump Station (SPS 29) was discussed. According to Section 3.2.2.1 – Sewage pumping stations (Table 3-6) of the project's EIS, the required works include not only a replacement of the existing pump station but also a laydown area and carpark.

The PMRC is concerned that the proposed pump station complex, subsequent piping in and around the pump station and the creation of easements on the property will have a significant impact on the PMRC's ability to construct future racing and training facilities, infrastructure and amenities required with the growth of our Race Club. In addition, Figure 3.2(c) of the EIS indicates that there is an area 'earmarked' at the entrance to the facility for indicative compounds. The PMRC is concerned with the adverse effect this will have on the entrance to the facility, for the Clubs major stakeholders and industry participants and the community more broadly that utilise the facility for non-raceday activations and community events. This has not been raised by PMHC representatives in any discussions.

#### **Alignment of the Sewer Rising Main & Sewer Gravity Main**

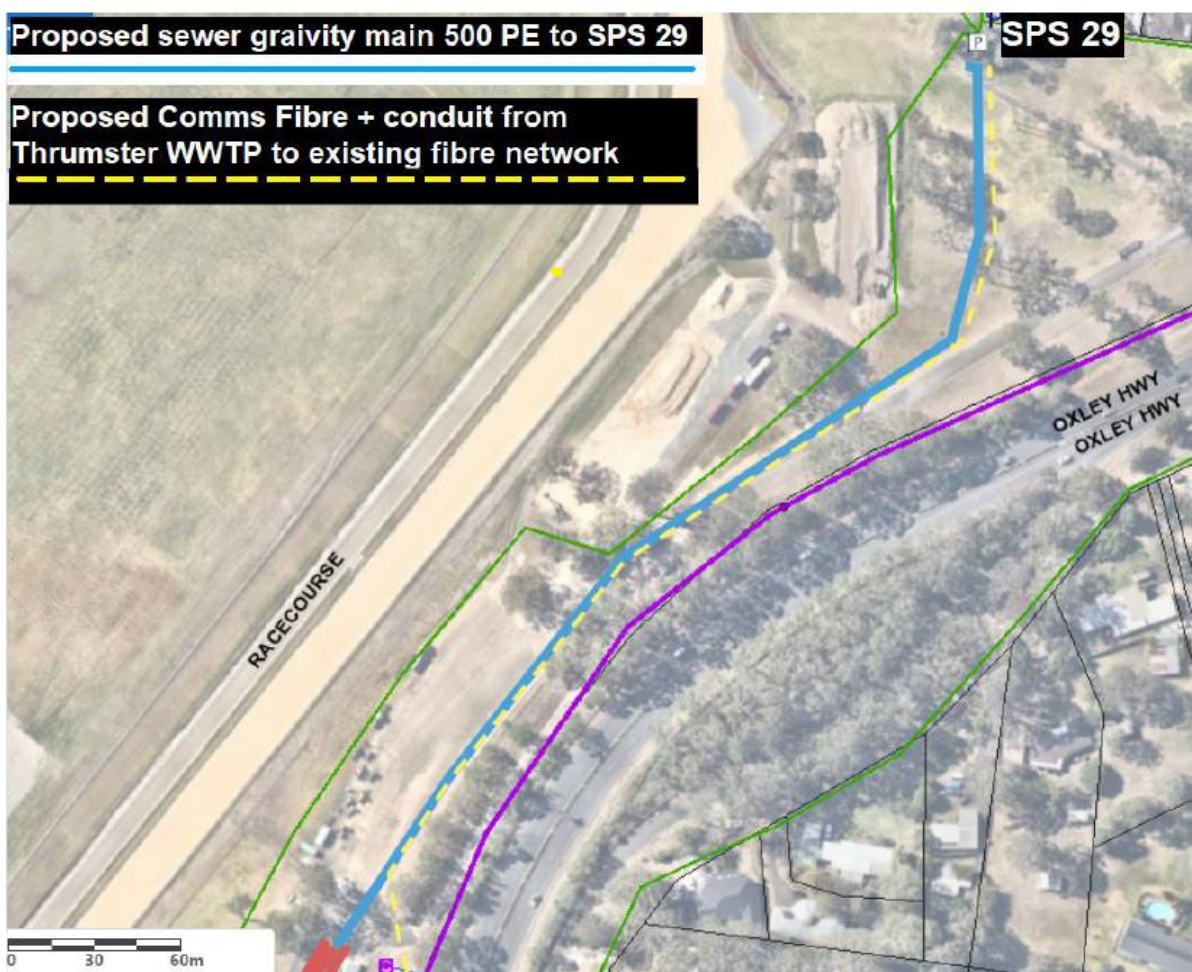
It is noted in Section 2.3.2 - Recreational areas of the project's EIS (Port Macquarie Racecourse) –

*"The water main, sewer rising main, and return effluent to Kooloonbung Creek pipeline components would be located directly north from the racecourse along a section of Lady Nelson*



*Drive. The sewer rising main would divert south along the Oxley Highway to the east of the racecourse. All components would be predominantly constructed via open trenching methods. The Oxley Highway underbore launch pit would be located on part of Lot 6 in DP0790668 on the Crown Land managed by Port Macquarie Racecourse”.*

However, when consultation re-commenced in July 2024, after a number of meetings and discussions with Council and their representatives, it has become apparent that the scope of works has changed. We have been advised it is proposed to run the Sewer Rising Main (‘SRM’) and Sewer Gravity Main (‘SGM’) through the racecourse property.



The maps below show the proposed rising sewer mains and connections from the existing SPS 53 and 57 through to the location of the existing SPS 29 proposed for major upgrade. Images are not to scale. Service locating is to cover the area between the existing PMHC communications conduit shown in blue in the map below and the proposed alignment of the x3 sewer rising mains to the west.

**Note, Site Investigations:** The Racecourse operator is unlikely to approve the alignment so close to the building foundations hence services are to be mapped between the building and the road reserve.

*Figure 2: Proposed Sewer Gravity Main on Racecourse*

In Figure 2, the Scoping Report indicates that the “racecourse operator is unlikely to approve the alignment so close to the building foundations”. The PMRC supports this assumption as the current alignment of the Sewer Mains on the premise will cause mass disruption to the Club’s core business operations of a racecourse (training and racing facility) and a function venue.

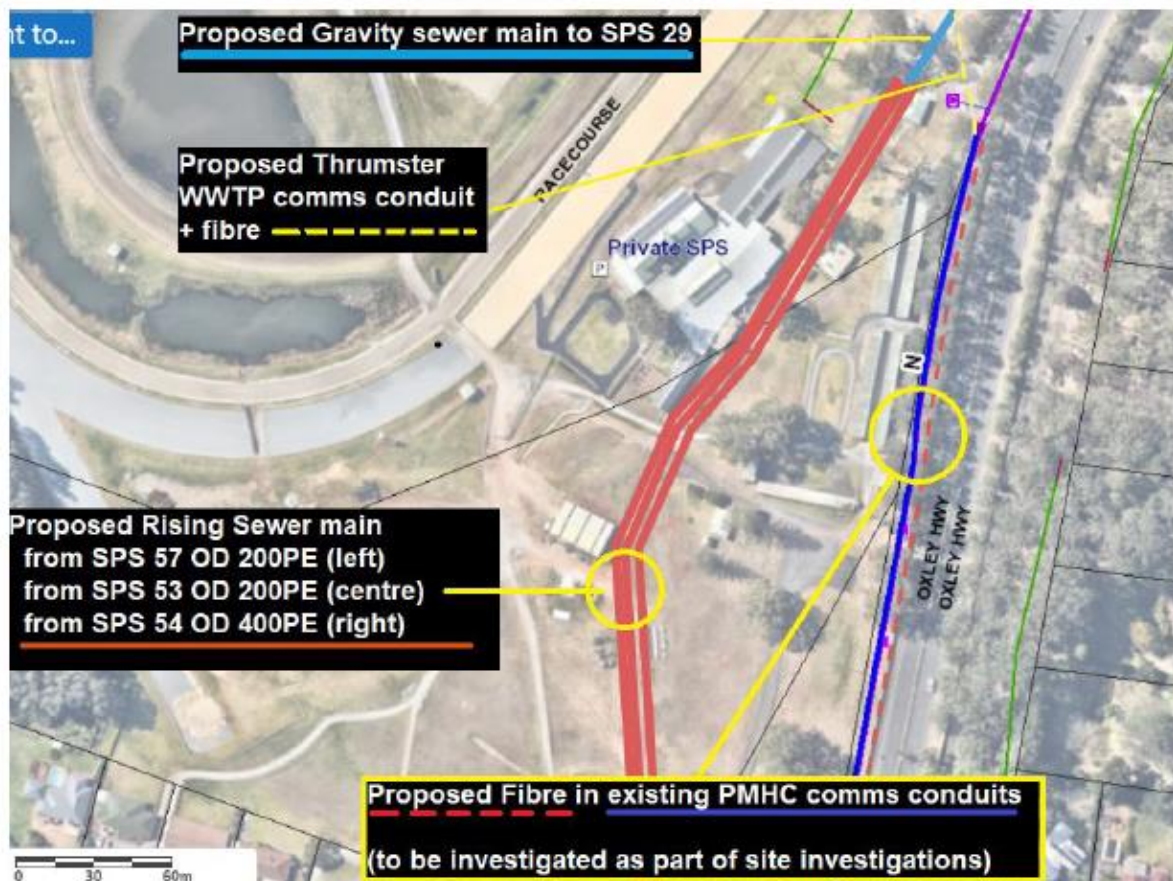


Figure 3: Proposed Sewer Rising Main on Racecourse

The current alignment of the sewer main will substantially impact the way in which the Club is able to conduct business.

#### **Associated concerns with development near a thoroughbred training/racing facility**

If the proposed works, through our property, are undertaken, we believe they will cause a considerable amount of disruption and consequently hamper our ability to conduct race meetings, provide adequate & safe training facilities and hold functions due to the following factors which have been outlined in both the EIS and the Social Impact Assessment ('SAA'):

##### **Noise, Vibration and Dust**

During construction, it has been acknowledged that we will have reduced amenity due to noise, vibration, dust and visual impacts. This will have a detrimental effect on our ability to hold functions.





As a Function Centre, we hold both day and night-time functions and are regularly chosen due to our location and the ability to offer quiet and private facilities with well-maintained grounds and surrounds. During construction, these benefits will not be on offer and will consequently lead to a decrease in the revenue from functions.

As previously stated, the Race Club conducts 25 race meetings per year and trackwork for over 100 horses, 6 days a week between the hours of first light to 9:30am. As a result, no work will be able to be conducted during the hours of trackwork (approximately 5:30-9:30am) and the entire day of a race meeting to ensure the safety of all horses, industry participants, patrons and staff.

### **Access**

The Club requires all access points to be clear and available at all times. These access points need to be to a standard so as not to pose safety risks to horses, industry participants, patrons and staff. Access points include our entrances at the Oxley Highway and Tulloch Road, together with internal access points. In particular, the gate which accesses our race day tie up stalls. This access point is used 6 days a week and allows our trainers access to the tie up stalls. Trainers transport their horses in via the Tulloch Road entry and then walk their horses through this gate. It is paramount that the integrity of this area is maintained at all times. At the conclusion of work each day, the site will need to be return to a condition that allows for safe access via all access gates.

### **Minimum Standards**

Race Clubs are required to adhere to Minimum Standards which have been prepared in accordance with Section 29A of the *Thoroughbred Racing Act 1996* (NSW). The objective of these Minimum Standards is to ensure consistent performance of racing and training so as to benefit welfare, prolong racing careers, establish ideal conditions for competitive racing and make racing more accessible, enjoyable and rewarding for all. Under these Minimum Standards, we are required to adhere to WH&S requirements and regulations. It is the utmost importance that these Minimum Standards are adhered to at all times throughout the construction to ensure that the PMRC can continue the conduction of training and racing.

### **Importance of the PMRC to the region and racing community**

#### **Thoroughbred Racing and Training Infrastructure**

The PMRC traditionally conducts 25 race meetings per annum and provides training facilities to in excess of 100 horses each day, 6 days a week. The training facilities that the PMRC offer continues to grow. This is evident by our most recent reconstruction of the course proper which has reopened in the past few weeks. We currently have approximately 100 horses currently in work at the facilities which means up to 50 licenced participants are in attendance 6 days a week and use various facilities within the racecourse. These facilities include the tie-up stalls, sand rolls, pre-parade ring, toilet facilities, grandstand and many areas in between. Over the past five years, an average of 1225 starters across New South Wales, which emphasises the importance that these facilities are to these horses



and trainers from being competitive in racing, not only in Port Macquarie but throughout the state. We are currently in the process of building on-site stabling to encourage new trainers to town. The construction of these stables will house 100 horses on site and increase the volume of participants within the industry and the Club. As a positive, this will boost the local economy through the construction work that will take place over the next couple of years and the potential new trainers, participants and horses who will move to the region to take advantage of these new facilities.

### **Raceday Activations**

Most of the 25 race meetings conducted by the PMRC are being held on a Friday, Saturday and Sunday. At any given race meeting, not including our feature days, the Club can host in excess of 2,000 people on site. At our New Years Day race meeting, we attract approximately 3,000 people, and on Port Macquarie Cup Day, we have anywhere up to 7,000 people which will include local businesses, local and regional politicians, racing identities, country, provincial and metropolitan trainers and jockeys, racing participants, members, owners and most important, the patrons, some of which travel intrastate and interstate to attend. All these people contribute to the Club, the racing industry in the Mid North Coast and New South Wales and tourism within the Mid North Coast region. This support can be through admission takings, bar sales, sponsorship and partnership revenue, wagering turnover or other revenue, they all play a part. We have seen significant interest in our Cup this year and the interest in the community and visitors alike is exciting after the 2023 edition of the Cup was run at Taree due to the reconstruction of the course proper. It is integral to provide a race club to the highest standard to keep the people coming back time and time again and helping with the growth of the industry and the growth of our towns tourism.

### **Non Raceday Activations**

Port Macquarie Race Club is a premier function venue in Port Macquarie and the Mid North Coast. We cater for meetings, expos, trade shows, parties, weddings, festivals and many community events. It is not unusual at some of these events for 3000 + people to be in attendance across the venue. We currently average 2-3 functions per week and the interest is growing. We offer the perfect venue due to our large open spaces with beautiful vistas and large car parking areas. It is space that the community enjoys, and we are proud to be able to present it the way we do.

### **Conclusion**

The Club is understanding of the need for the project above to cater for the growth and the benefit of the entire Port Macquarie region. The PMRC asks that all options are taken into consideration so as to cause the least disruption to Port Macquarie's race club.

We are very proud of what we can provide to the racing and the wider Port Macquarie community. We have a facility that rich in history but is moving forward by providing high-class racing facilities paving a bright pathway for the future of racing in Port Macquarie.



Port Macquarie Race Club is about to begin racing after 15 months. During this time, our course proper has undergone a reconstruction, and it is anticipated being one of the best racing surfaces in Australia. We have been without any racing income during this period and any further disruptions to our business would be extremely detrimental.

Racing at Port Macquarie provides revenue and tourism not only to the Club but the wider community and with improved facilities it will only become stronger. We believe if the proposed development proceeds as proposed, it will have irrevocable effects on the racing industry and community due to the extensive disruption and inability to conduct our business efficiently.

Yours faithfully

*Nardi Beresford*

Nardi Beresford  
CEO