

Kerryn and Randall Woo
135 Darling Street
Broadmeadow, NSW 2292

Application Name: Newcastle Jockey Club – New Stables Complex

Application Number: SSD-12982045

As the owners of 135 Darling Street, Broadmeadow we **object** to this proposal for the following reasons:

Size of Proposed Development

The proposal includes stables for 520 horses – which represents a 67% increase to the current on-site stabling capability. The justification provided for this increase in capacity was that it was *“selected based on future demand and to maximise efficiency in the use of land and resources”*. We feel that this is not an adequate justification, particularly when the NJC in their Management Plan state that due to a lack of resources (rider availability), there is a maximum of 375 horses expected to use the facility on any one day.

In addition, 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.

Having a lesser capacity provides benefits for air quality, traffic, parking and noise, some of which are detailed further below.

Air Quality

The proposal inadequately mitigates the risk of odour and dust from the stables. In addition, 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.

As stated above, we believe the control measures proposed for odour and dust mitigation are inadequate. The focus of the EIS and Air Quality Report (AQR) is on the storage of waste in “sealed bins”. 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).

An additional concern is that 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.

Proposed alternative:

- Re-orientate the stables such that the natural ventilation is directed away from nearby residences during prevailing winds
- Install mechanical air extraction and filter units to stable buildings

- A decreased development size would create space for further setbacks from nearby receivers
- New stables could have been built at the existing stable location. A new track access point could have been built, thereby still negating the need to float horses from the stables to the track and reducing the number of residences impacted by this development.

Parking

The parking assessment for peak days (race days) is inaccurate and does not address the impacts of the proposed development on local parking. It is inaccurate in that it has utilised capacity from the Future Stage 1 and 2 Carparks (Table 1 - Traffic and Parking Assessment) to show that an acceptable level of on-site parking will be maintained. Given there is no current Development Application for these carparks and their construction requires the demolition of residential housing and a childcare centre, it is not valid to include these parking spots in the assessment. Because of this, we do not feel a competent assessment of parking availability has been completed.

We do note the proposal to use temporary markings on the grassed area to increase parking efficiency on race days, however we feel this does not equate to compensation for the parking area that will be lost due to the proposed stable development.

In addition to this, there has been no consideration to the availability of parking during what will be an extensive period of construction.

Proposed alternatives:

- 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

Pests

The EIS, including the Pest Management Plan does not address the risk of flies and mosquitos AT ALL. This needs to be addressed for the benefit of all NJC's neighbours as well as for the welfare of the horses.

Water Management

The three basins that are located adjacent to Darling Street at the southern side of the development appear to be designed to prevent surges into the council stormwater system. We are concerned that these basins will attract and be prime breeding ground for mosquitos and flies if not maintained properly.

Proposed alternative:

- Construct underground retention systems.

Whilst we appreciate the need for the NJC to expand and provide a more practical stabling solution for the horses and their associated activities, we feel that the development proposed has not adequately contemplated the impacts on nearby residents. The benefits of this location for the NJC are clear – no downtime as the current stabling arrangement can be used whilst this proposed development is under construction, it is adjacent to the existing track access point and there is ample space for their wants and needs. However, at no point during our review were we confident that potential concerns of residents were appropriately valued in any risk/benefit analysis of choosing the proposed option. We are particularly disappointed in the mitigation measures placed on the issues that would be of largest concern to us and our neighbours – that being air quality, pests and parking.

We urge you to firstly, reconsider the size and location of this development and secondly, apply much stronger mitigation measures to the air quality, pests and parking risks associated with this proposal.

Regards,
Kerryn & Randall Woo