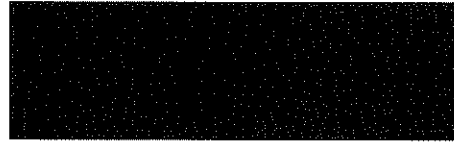


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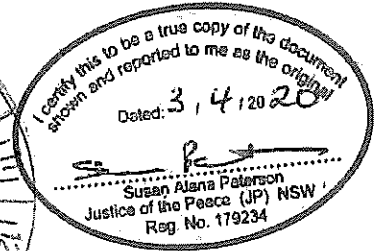
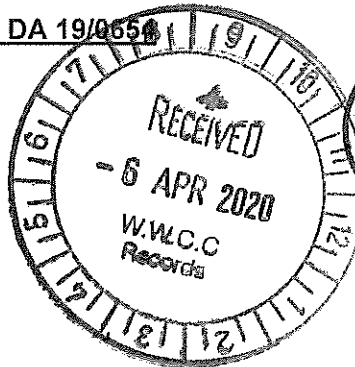
03/04/2020



Submission Development Application DA 19/0654

File Number D/2019/0654

Proposal: GN Harrison
Stable Complex
Murrumbidgee Turf Club
140 Travers St Wagga Wagga



Dear Sir/Madam

We wish to declare that we are seeking privacy rights over our personal details.

[Redacted] and we commend the MTC in its endeavour to develop the racing fraternity and bring wealth and tourism to Wagga Wagga. Tourism and local charities and institutions enjoy a huge boost from the Wagga Gold Cup and numerous other racing activities throughout the year.

[Redacted] it is with disappointment that we make this submission **against** the proposed development **DA19/0654** for the construction of a stable complex in this location.

The proposed development application the MTC are now submitting will be to the detriment of the quality of life of its close neighbours.



It seems inconceivable that a development such as this could be considered in a very old established and still developing residential area in the year 2020.

- *The characterisation of the development should be closely considered by Council. The proposal is reliant upon being ancillary to the existing use of the site as a 'racecourse' which is characterised as a recreational facility (major). The scale and cost of works of the development suggests the proposed use may be more appropriately characterised in its own right, particularly in consideration of the other uses it entails (e.g. office space, lunch rooms, veterinary clinic, toilets for over 30 staff etc).*
- *The proposal is clearly able to operate for commercial gain in isolation from the MTC's main operations. The new and isolated access point to the development site and that the MTC's existing stables appear to be retained on site, further highlight that the proposed development is not reliant upon the existing use of the site. The proposed development could be more appropriately characterised as an animal boarding or training establishment which means 'a building or place used for the breeding, boarding, training, keeping or caring of animals for commercial purposes (other than for the agistment of horses), and includes any associated riding school or*

ancillary veterinary hospital'. An animal boarding or training establishment is a prohibited land use in the RE1 and RE2 zones.

- As we understand, the proposed development involves Crown Land (Lot 2 DP 840187) and Council Land (Lot 1 DP 663066). With the value of works exceeding \$5,000,000, this would trigger Regionally Significant Development provisions under State Environmental Planning Policy (State and Regional Development) 2011 and the Southern Regional Planning Panel would be the determining authority. This has not been addressed/discussed in the Statement of Environmental Effects.
- This is starting to appear as 'development by stealth' as the development seems more commercial than recreational which would not fit within the current zoning of Recreational use.

We believe the construction has been designed for the wrong location as it is directly opposite well established housing which has existed since the mid 1800's.

When looking at your race course design, there is more than enough land to provide ample stables at the northern end of the racecourse, which backs onto Travers Street, across the road from a trucking depot. Alternatively they could be built on the inside of the track on the north western side close to the turn. Wagga does not have enough long distance races to be a hindrance for viewers of the races. If moved, the stables would be well enough away from current residences.

According to the racing calendar there are only 26 racing events in a year in Wagga including the Wagga Gold Cup. This number can or will increase with other clubs transferring their events due to outside influences (weather, bushfires etc.) There are many horses stabled there all year round and this number is evidently growing considering the proposed development for more stables.

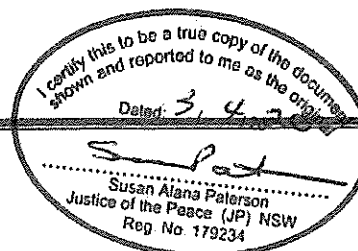
It begs the question; has the use of this location outgrown itself?

Whether residents have lived in Beckwith Street for many years or who have purchased properties in more recent years they did not expect to have to reside near a large number of continuously in-use horse stables. This is a mainly a residential area and the right for this quality of life should be maintained. They purchased their properties knowing the race course catered to 26 race days a years and daily track work for a limited number of horses, the track being well away from the street. For the application to suggest in section 7.4 that the "Nature and operation of the stabling activities will not be foreign to the local area", is at best disingenuous, if not deliberately misleading.

This change to the streetscape, air quality and increased traffic and noise will be very challenging both aesthetically and for the resident's daily quality of life and leisure and possibly health.

The real estate value of properties in this area has greatly increased in recent years and we feel building a large number of horse stables which will be used every day of the year from very early in the morning and late into the day may well impact on the value of these centrally located properties.

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3.2 Site Characteristics. Item 3.2.1 Surrounding Land

The subject land includes parts of Lot 2 DP 840187, Lot 1 DP663066 and Lot 7314 DP 1141841, known as 140 Travers Street, 60 Beckwith Street and 42 Beckwith Street, as identified in the mapping extract below. The MTC land includes frontages to Travers Street, Beckwith Street, Slocum Street and Kincaid Street.

The land is zoned part RE1 Public Recreation (Lots 1 and 7314) and part RE2 Private Recreation (Lot 2). The land use activity is considered an ancillary use to the MTC Racecourse, which is defined as a recreation facility (major), and is permissible with consent.

As stated in application table 1 and table 3, shows the development not for public recreation, as it has locked gates, high fencing and signs erected as stated in item 4.7 identifying the land as **private property**. The site is also in very close proximity to a heritage conservation area (Figure 28), within 70m at its closest point, and this has not been taken into account.

The surrounding public recreation land (cricket ground, Cycling track and tennis courts) of the proposed stable site does not generate the volume of odour, noise and activity which will come with the new development at this site.

There is also the issue of dust particles which could be injurious to resident's health such as those with asthma and allergies to airborne pollutants from hay and dry feed and the rising dust from the movement of many vehicles.

There will also be an increase in noise from horse trucks, delivery vehicles, rubbish removal and staff arriving and departing.

Horses attending away meets will be leaving early in the morning and arriving home in the middle of the night or the very early morning hours which will also entail the loading and unloading of vehicles, accompanying vehicles, staff activity, staff vehicles, utilities and cars. With the development having a large security gate, this is assumed to be constantly opening and closing, potentially another constant point source of noise which has not been addressed. In fact it appears there has been no noise impact assessment conducted at all for the development and it should not even be assessed without such an important document, let alone approved.

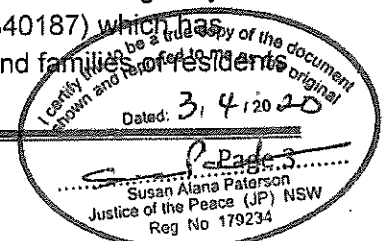
Item 3.2.3 Connections/Transport Network

We believe there has been inadequate research into the transport aspect of the report.

With the gate entrance and a frontage of 160m along Beckwith Street opposite a built up area with traffic supposedly only operating from 4.30am to 5.00pm this would definitely cause a disturbance with the braking noise, engine noise, reversing noise to existing home owners, which includes health professionals and others who reside in this area and work shifts, and additionally headlights shining directly onto the units opposite the entrance, and extra lighting to ensure safe navigation around the facility, and for security purposes. There has been no assessment at all of the light impacts from the proposed development for either traffic or security reasons. The development application should not even be assessed without such critical information.

The entrance would eliminate 5-6 car spaces on the western side (right of Carriageway across lot 1 DP 663066 and lot DP 7314 DP 1141841 and Lot 2 DP 840187) which has limited parking to accommodate the surrounding business activities and families of residents

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Estimating an extra 104 vehicle movements per day as stated in item 4.6.4 would be an underestimate with an extra 30 full time staff, plus owners, trainers, jockeys and stable hands all coming and going as well as extra transport trucks and delivery vehicles.

Item 3.2.4 - Air Quality Monitoring Station *In 2014, an air quality monitoring station was commissioned on part of Lot 1 by the EPA.*

There does not appear to have been any consultation recorded with the NSW EPA on location and likely required relocation of the air quality monitoring station. Whilst the air quality monitoring station may be outside of the footprint of the proposed development, the location of these important monitoring stations is reliant on not being impacted by close structures and activities producing dust in the immediate location. This was the reason for the relocation to this site in 2014.

Furthermore, the fact that the consultants completing the odour assessment used wind data from the Bureau of Meteorology site at Forest Hill, some 11km from the proposed development site rather than data that can be easily and freely obtained from the site in question calls into question the quality of the entire report and the data on which their outcomes and assumptions are based upon.

I believe there has been inadequate research into the environmental aspect of the report at this current date as stated in your report of 2014.

It is documented in your report that an average horse can produce **22. kg** of manure per day. The stables have 125 horses to be stabled this equates to **19,250 kg** or **19.250 tonnes** per week.

As well as manure, horses discharge approximately 12 litres of urine a day. It is noted that race horses can produce up to 30 litres a day. This equates to 125 horses discharging **up to 10,500 litres a week.**

Furthermore, the Waste Management Plan points out that "*Stabling horses at higher stocking rates associated with professional equine sporting facilities requires greater inputs leading to increased outputs*", as opposed to the "average" outputs of a horse. This has not been quantified, calling into question whether the figures used for the production of the waste management plan are representative of the actual volumes of waste likely to be generated by the proposed development.

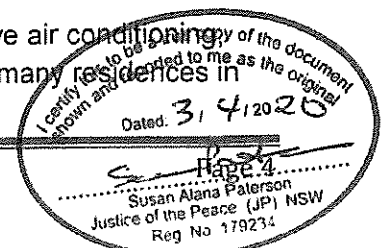
It is also well documented that horse manure and urine have unhealthy ammonia fumes, moulds, bacteria and parasites.

It is planned to store this manure and urine soaked bedding in covered hoppers for up to a week before removal. This is reliant on staff action to maintain correct use of these hoppers to reduce odours.

Can it be guaranteed that the hoppers will be kept closed at all times, except when being filled? These hoppers, if left open would especially produce odours. This would be very prevalent in both wet weather and in the heat of summer when Wagga temperatures range from mid 30's to mid 40's.

As most Wagga homes have air conditioning and commonly evaporative air conditioning which draws in air from the outside, these odours would be drawn into many residences in

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the surrounding streets. This would be particularly prevalent during the daily air inversion which occurs in the late afternoon and evening in both summer and winter. This is the time of day when many residents have returned home from work, have their windows open, air conditioners running or are entertaining outdoors. This would also be particularly offensive to the patrons at the old established hotel nearby which has an outdoor entertaining area.

This falling air inversion is a daily phenomenon.

There will also most likely be an increase in rodents and the possible use of rodenticides. This increase in rodents could impact on neighbouring residents and rodenticides on their domestic companion animals and birdlife.

This is a very unfair situation for a long established residential area to have to now endure. After all this would be a new commercial type operation entering a very old established and gradually growing residential area.

This is a different situation to the smell which is continually emitted from the stables in Slocum Street, these stables having been there for many years. Presumably these stables will gradually be removed with the building of the new stables therefore improving the air quality in that gradually developing medical and residential area.

4 - Development Proposal. Item 4.2

Justification of Development

Historically, the surrounding lands have accommodated stabling and horse training areas. However, a significant number of older stable facilities have been replaced with residential development, primarily due to residential land use demands of the City's continued growth

Beckwith Street first appeared on plans for the town of Wagga in 1849. We no longer have stables, fowl yards or outside privies in our back gardens.

Was there an adequate investigation to find other more relevant sites on the MTC holdings? (Northern boundary or inside the wide open spaces of the complex). The primary justification for not proposing that location was to house the horses further from the MTC crowds, and to increase traffic along a residential road rather than an arterial road.

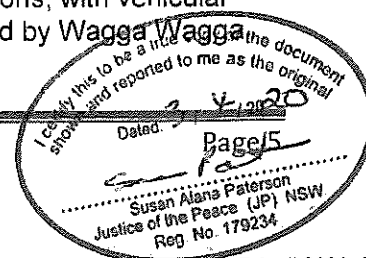
Due to the obvious land use conflict between the proposed development and the adverse amenity impacts it will create on the adjoining residential precincts to the east and west through traffic, noise and odour, the development could be far more appropriately sited.

There are several other areas available on the MTC land which could benefit the owners and trainers and not adversely affect the existing land owners in the surrounding streets.

The race course is a valuable asset to the nearby businesses with the extra patronage at race time (26 race days a year), to the RSL Club and motel, the Sportsman's Club Hotel, the Commercial Club and main street entertainment venues and accommodation.

4.5 Subdivision and Easement

As identified in Section 3.1, the subject site involves multiple land portions, with vehicular access from Beckwith Street traversing Crown Land currently managed by Wagga Wagga



City Council. The proposed boundary of the development follows the physical natural layout of the MTC site.

As identified in item 1.1 this land is zoned part RE1 Public Recreation (Lots 1 and 7314) and part RE2 Private Recreation (Lot 2). The land use activity is considered an ancillary use to the MTC Racecourse which is defined as a recreation facility (major), and is permissible with consent.

As stated previously, this is crown land and is designated for public recreational usage and not a business usage in item 3.2.1

4.6 Details of Proposal - 4.6.1 Staff.

We commend the MTC for creating a *30 additional full time jobs*.

However, our question would be: are these jobs being transferred from existing jobs or rebadged. Is this deliberately misleading in its claims to further the chances of approval?

Is the complex on Slocum Street being gradually being dismantled and transferred to the new complex?

Are the facilities in keeping with Wagga Wagga City Council future development and growth?

4.6.3 Hours of Operation

Given the nature of development, the stables will be in use 24 hours a day, 7 days a week from 4.30am to 5pm. MTC race days are from 11am to 7pm with 'away' race meetings 9.30am to 8pm. Due to the nature of the development and industry, times may vary due to travel times, race times and catering to the horses. Track work is conducted during the morning with light duties, office procedures and attending to the horses in the afternoon

- Is this in keeping with the usage of the designated land as stated? (*Previously, this is crown land and is designated for public recreational usage and not a business usage in item 3.2.1 which is only used as the public requires*).
- How does 24 hours per day equate to 4:30am to 5pm? The stated hours of operation are entirely worthless as pointed out in the development saying that the times will vary due to the nature of the development and industry.
- This changes the whole demographic makeup of the surrounding residential area.

4.6.4 Traffic Generation, Car Parking and Access

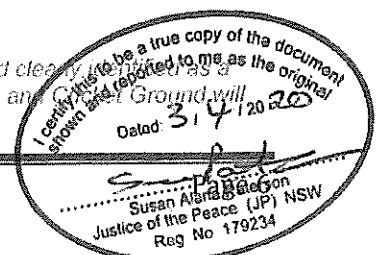
Taken from the traffic management plan: *Estimated traffic generated by the proposed development is 104 vehicle trips per day, with 39 trips in the AM peak period and 16 in the PM peak period. This traffic is not anticipated to have a significant adverse impact on the surrounding road network.*

- As stated in item 3.2.3. Estimating an extra 104 vehicle movements per day would be an under estimate with an estimated 30 new full time jobs, owners, trainers jockeys and stable hands all coming and going as well as extra transport trucks. Already Beckwith Street has increased traffic usage with people coming and going from the northern suburbs and the University and Schools.

4.7 Safety and Security

The proposed stable compound is a gated facility separated from the public domain and clearly a private area by fencing and screen plantings. The boundary adjacent the Cycling Track and also be fenced with appropriate signage identifying the land as private property.

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The facility will be continually monitored to ensure ongoing safety and security for horses, attendees and general public. The nature of operation of the facility will ensure continued onsite activity and natural surveillance by staff and the local neighbourhood.

Safety and security will include security gates, and lighting to allow for the "natural surveillance by staff and the local neighbourhood". Neither the impacts of potential point source of noise of the security gate opening and closing at all hours, nor the impact of lighting at the facility have been addressed in the application. We believe the application cannot be considered without such important investigations.

As stated in item 3.2.1 surrounding land

The land is zoned part RE1 Public Recreation (Lots 1 and 7314) and part RE2 Private Recreation (Lot 2). The land use activity is considered an ancillary use to the MTC Racecourse, which is defined as a *recreation facility (major)*, and is permissible with consent.

This new complex appears to be a **commercial** venture.

5 Infrastructure - 5.2 Waste Management

The WMP recommends monitoring through use of a waste logbook, site inspections and site audits. MTC will be responsible for ongoing development of waste management solutions and maintenance of records for site.

- Who will be responsible for the management of the site inspection, audits and complaints (EPA, Wagga Wagga City Council or MTC)

As stated in item 3.2.4 It is well documented that a horse can produce **22.kg** of manure per day. For 125 horses, this equates to **19,250 kg** or **19.250 tonnes** per week not including bedding. It is also documented that horse manure has unhealthy ammonia fumes, moulds, bacteria and parasites.

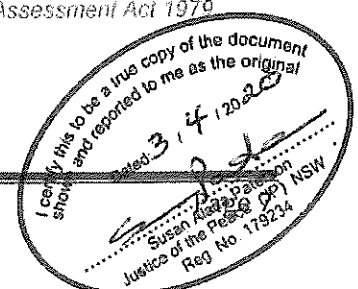
If horses discharge 12 litres of urine a day this equates to 125 horses discharging up to or more than 10,500 litres a week. It is noted that race horses can produce up to 30 litres a day.

- As stated in Table 2-1 in the waste management plan 60m³ of stored manure and bedding onsite per week. (19.250 tonnes). Considering the information quoted above, without including bedding, how was your figure reached?
- This could be a minimum as it does not show if a study has been conducted with 125 horse held in the one spot?
- Have they established how much urine will be washed into the Wagga Wagga City treatment works?
- Has it been confirmed that the municipal sewer has the capacity to receive the effluent being generated by the wash down areas and swimming areas? Is it permissible without pre-treatment? Can the sewage treatment plant actually handle the type of effluent, generally high cellulose content which isn't accounted for in the design of STP's as it is not a waste stream generally produced by municipal effluent.

6. Planning Policies and Guidelines

Development on the land is subject to the provisions of the Environmental Planning & Assessment Act 1979 (EP&A Act) & Environmental Planning & Assessment Regulations 2000 (the Regs).

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It is amazing reading from table 4-5 of the state environmental policy that there are no policies regarding Noise, Odour and how far from housing you can build a stable complex.

- In the Western Australian policy, a stable cannot be built within 200 metres of housing dwellings. In the absence of specific NSW policy or guidelines, a suitable relevant guideline from another Australian jurisdiction should be used. In the proposed development, it appears that the closest stables would be approximately 50-60m from the nearest dwelling.

7.2 Community Consultation

A preliminary consultation meeting was conducted on 15 May 2019 at the MTC where local neighbouring premises, including residential and non-residential owners and occupiers, were invited to attend. A total of 27 attendees were present including MTC board members, design team and community members.

Question: At this meeting what percentage of the group were residents compared to people with ties to the project? It appears that the consultation process for a development of such a potential impact has been very substandard, and at the very least should be done again, based on a professionally designed and executed consultation plan.

7.4 Noise

The existing activities of the Cycling and Cricket grounds currently generate acceptable levels of noise impact on the surrounding area. The stabling complex has been designed to ensure onsite activities are contained within manageable areas. The nature and operation of the stabling activities will not be foreign to the local area where stabling activities have occurred since the MTC began operations.

The current existing activities as mentioned in the statement above which have been in existence for many years, do not start at 4:30 am or generate the noise level of 125 horses and proposed vehicle traffic 24 hours a day, 7 days a week and 365 days of the year. There may have been stable activity in the first operations of the MTC but they have not been in that eastern vicinity for many decades.

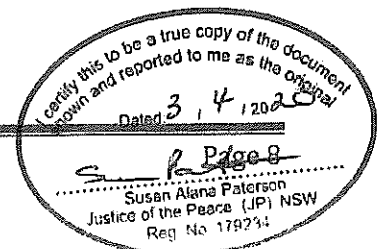
7.5 Odour

The overall objective for managing odour impact from the proposal is to ensure that best practice is applied in the design, operation and management of the facility so that odour does not cause unacceptable impact on nearby sensitive land uses in the locality.

As stated in item 3.2.4 it is documented in your report that a horse can produce **22 kg** of manure per day. The stables have 125 horses to be stabled which equate to **19,250 kg** or **19.250 tonnes** per week without bedding. Albeit the report also indicates this may be an under-estimate for this sort of activity but does not address this in any way.

As well as manure, horses discharge approximately 12 litres of urine a day. This equates to 125 horses discharging a minimum of **up to 10,500 litres a week**.

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It is also well documented that horse manure and urine has unhealthy ammonia fumes, moulds, bacteria and parasites.

It is planned to store this manure and urine soaked bedding in covered hoppers for up to a week before removal. This is reliant on staff action to maintain correct use of these hoppers to reduce odours.

Can it be guaranteed that the hoppers will be kept closed at all times, except when being filled? These hoppers if left open would especially produce odours. This would be very prevalent in both wet weather and in the heat of summer when Wagga temperatures range

Question: Who will regularly monitor the compliance of odour control and any complaints?

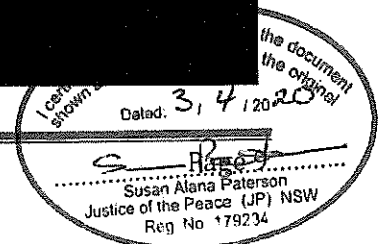
- *The odour assessment is entirely reliant on human intervention to reduce odours which will emanate from the site. This is not considered to be appropriate, even more so in consideration of the development site being located directly adjacent to a long established residential area. Proposed odour mitigation measures need to be reviewed and consideration*
- *Due to the obvious land use conflict between the proposed development and the adverse amenity impacts it will create on the adjoining residential precincts to the east and west through traffic, noise and odour, the development would be far more appropriately sited at the northern end of the race course adjacent to Travers Street.*
- *The Statement of Environmental Effects mentions that Lot 1 DP663066 (RE1 zoned land) is currently classified as 'community land' under the Local Government Act 1993 and that 'An agreement will be required to be secured with Council for ongoing access and occupation arrangements over that applicable parcel of land'. Land classified as 'Community' ordinarily comprises of land such as public parks, reserves or sporting grounds for use by the public (i.e. for public recreation as per the land's current zoning). Would the land then need to be re-classified to 'Operational' under the Local Government Act 1993 should the proposal go ahead? Would this then be acceptable in a residential area?*
- *How does a proposed "odour complaint system" actually mitigate odour to nearby receptors? Whilst it might look like a good idea on paper and is a start, it does not mean anything unless the odour source is actually addressed. It is quite common that operators that receive a high number of complaints, or regular complaints from individually impacted residents that might be highly impacted due to their specific circumstance are written off as being vexatious, rather than actually addressing the issue.*
- *What contingency measures are proposed if the development is approved and constructed and odour cannot be adequately managed?*

Is Council considering a clause within the approval that can revoke approval if impacts, whether it be of odour, noise, light, dust or any other impact, cannot be mitigated so as to not detract from the wellbeing of property owners in the area? We know this is not the case and cannot be the case.

We therefore consider this development entirely unsuitable for the proposed location.



DA 19/0654 3rd April 2020





To Whom it May Concern

I am writing to make a submission in regards to DA 19/0654 Stable Complex Murrumbidgee Turf Club

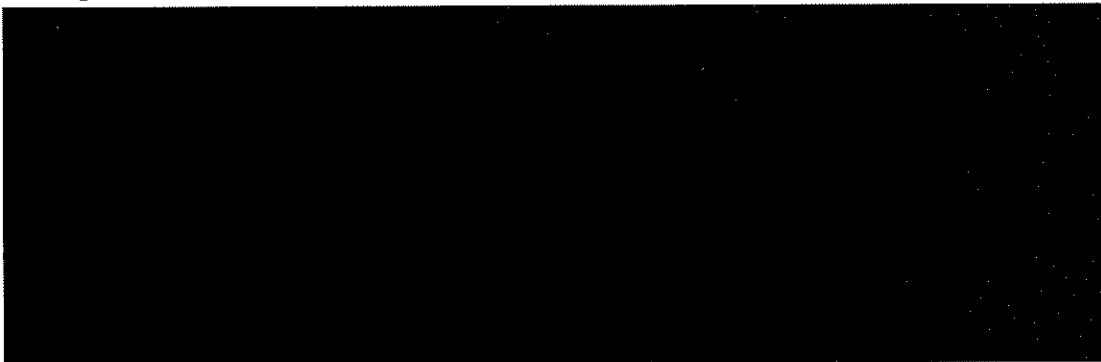
[REDACTED]
I have a number of major concerns regarding the health impact of the stables in close proximity to a residential area.

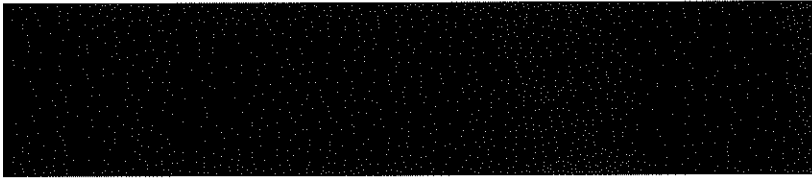
The complex is intended to house a large number of horses (perhaps up to 150). These horses will produce a large volume of excrement which will attract flies and this may create a significant health hazard to neighbouring residents as well as children who use the adjacent sporting facilities. [REDACTED]

There will also be a significant impact from the noise of the horses, particularly if there is early morning track work.

Another factor will be the smell from such a large stable complex.

I cannot understand why the development cannot be built away from the residential area, for example on the Travers Street side of the complex, where there appears to be ample space.





Dear Sir/Madam,

Due to the additional time granted for the MTC stables development, I have taken the time to view the development in greater detail.

Whilst it would appear that a site facing Toll would require tree removal, the option to locate the facility in the middle of the race course appears to have had little consideration. This proposed development has a land cost of zero dollars. It is using Dedicated Crown Land. Dedicated for the purpose of Race Course. The cost of the development of an underpass (under the existing Track) would allow this development and some future suitable use of lands within the middle of the course. An underpass was provided for the MTC with the Gobba Bridge approaches. The use of lands in the middle of course would allow a greater distance from residential areas.

Subject to the proposed development being located as requested on lands immediately adjoining the Wagga Cricket Ground it is requested that the relocation of the Starting Gate Sheds not be located at the southern end of the stables and better located adjoining Stable 3 complex. This shed has an height of approx 4 metres and its visual impact would be greatly reduced if it was located further to the North away from Kincaid St.

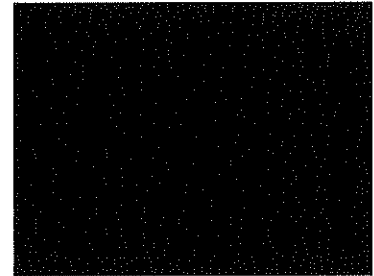
It is noted that Nil access is proposed from Kincaid St, even during construction.

It is noted that some 60 cubic metres of manure and bedding (19,000kg of manure) will be generated from the site. The proposed Waste Management Plan, hopefully will be randomly checked by WWCC.



Planning & Administration Co-Ordinator
PO Box 20
Wagga Wagga
NSW 2650

02/04/2020



Submission Development Application DA19/0654

File Number D/2019/0654

Proposal GN Harrison
Stable Complex
Murrumbidgee Turf Club



Dear Sir/ Madam

I wish to declare that I am seeking privacy rights over my personal details

For over 50 years I have been a silent admirer of the MTC and how the race course and facilities have developed. The MTC has provided the best elements country racing together with related social and charity events

Riverina Tourism receives an enormous boost by virtue of these events (eg the Wagga Gold Cup Carnival)

I congratulate the committee on these endeavors and applaud those associated for their contributions throughout the years.

Therefore It is not without some degree of anguish that we forward this submission is in opposition to DA19/0654

This submission relates to a number of matters but it is best summarized by the objection due to the size and the selected location of the proposed Development

Many of the issues raised have previously been documented at the consultation meeting 15 May 2019. Several of these issues have been addressed but are still considered to still be of some concern and in some cases the responses are considered inadequate or require additional investigation

I have provided the following comments

7.2 Community Consultation

A preliminary consultation meeting was conducted on 15 May 2019 at the MTC where local neighbouring premises, including residential and non-residential owners and occupiers, were invited to attend. A total of 27 attendees were present including MTC board members, design team and community members.

The community meeting outlined in broad terms the proposal and sought feedback from those present on any particular matter of interest or concern that would be the subject of further analysis prior to lodging of a development application.

Matters raised at the meeting included:

- Location of the stables complex with adequate setback from Beckwith Street
- Horse washdown areas and opportunities for water reuse
- Odour management
- Collection of manure and waste management
- Total number of expected horses
- Animal welfare matters including security for horses and access to open space
- Dust and noise management
- Traffic control and onsite parking arrangements
- Access of horses direct to the racetrack
- Sufficient area for loading and unloading
- Use of stables for other trainers from out of town
- Hours of operation – noting the nature of the racing industry including training
- Landscaping treatment to Beckwith Street frontage
- Overall timing of the project from construction to operation
- Impact on residents to be taken into consideration

The above points have helped inform and direct the content of the planning report, specialist reports and SEE.

Location

The proposed "Location" is still an ongoing concern to some of residents of Beckwith and Crampton Streets
Relocation of the stables is highly recommended
This would alleviate many of the Residential issues raised by citizens of Beckwith and Crampton Streets

Recommendation that this proposal be relocated to a more compatible location in order to alleviate many of residential concerns.(eg Travers Street fronting the Industrial zoned areas)

Adour Management, Still one of the major concerns

Especially with only a 10 metre buffer between some of the stables and Beckwith street.road boundary Considered inadequate

Clause 7.5 provides an "Odour Assessment Report" and the need for a strong four step waste management process in order to achieve Odour compliance

Part of the report is based on an elaborate software programs. It has been suggested by some that the results provided may be very subjective to input parameters and supplied monitoring data.

The conclusion derived is very much in question.

It is recommended that an independent assessment be carried out in order to provide credibility

In the court of public approval it is suggested that the best of maintained stables still smell badly and the worst maintained can be horrific A simple walk down Slocum Street on a unfavorable day can easily verify these concerns

Suggest more investigation needed

Recommendation More investigation needed or possibly engage another consultant to provide independent results

Waste Management,

Any functioning waste management plan may only be effective as its compliance and enforcement requirements

Regular inspection and enforcement are necessary by a nominated Authority

An example noncompliance and lack of enforcement can easily be seen at the of horse stables on the Oura rd in North Wagga

Recommendation Require more information on inspection and policing necessary for compliance Specific inspection frequency, Details of relevant inspections by Authority etc, Who is responsible (Council, EPA other ?)

Justification of large Horse numbers

The proposal is for 125 stalls in this development as well as the existing stalls on the eastern side off Slocum street

Details of future planning maybe helpful

Traffic Management& Reduced External Parking& Reduced External Parking

The TIAR Report provides a comprehensive summary

However consideration to the following concerns are requested

- Projected Traffic access volumes appear to be very low to serve 125 lot lot stables and vet clinic
- Projected Traffic access NIGHT volumes
- Horses returning from district meetings together with routine early morning work-outs Traffic volumes considered very low Suggest revision
- Night traffic exiting the stables will generate head light glare into the windows of the units opposite

- The new access will remove 4 to 5 parallel parking spaces on the opposite side of the units

Recommendation Consider the points raised include in the report

General Zoning objectives

The appears to be an obvious conflict of objectives between long term existing **residential uses** and that proposed in this development (which could easily be considered as a **Rural** and/or **Commercial** development

Recommendation That this proposal be relocated to a more compatible location (eg Travers Street fronting the Industrial zoned areas)

Specific Planning comments

The following comments are provide by our planning consultant

- As I understand, the proposed development involves Crown Land (Lot 2 DP 840187) and Council Land (Lot 1 DP 663066). With the value of works exceeding \$5,000,000, this would trigger Regionally Significant Development provisions under State Environmental Planning Policy (State and Regional Development) 2011 and the Southern Regional Planning Panel would be the determining authority. This has not been addressed/discussed in the Statement of Environmental Effects.
-
- **Question** Who will be the determining body?
- If Southern Regional Planning Panel is the determining body
- Suggest that this be stated in the SEE

- **The characterization of the development** should be closely considered by Council. The proposal is reliant upon being ancillary to the existing use of the site as a 'racecourse' which is characterized as a recreational facility (major). The scale and cost of works of the development suggests the proposed use may be more appropriately characterized in its own right, particularly in consideration of the other uses it entails (e.g. office space, lunch rooms, veterinary clinic etc). The proposal is clearly able to operate for commercial gain in isolation from the MTC's operations and not be reliant (ancillary) to their land use functions. The new, and isolated access point to the development site and that the MTC's existing stables appear to be retained on site, further highlight that the proposed development is not reliant upon the existing use of the site. The proposed development could be more appropriately characterized as an animal boarding or training establishment which means 'a building or place used for the breeding, boarding, training, keeping or caring of animals for commercial purposes (other than for the agistment of horses), and includes any associated riding school or ancillary veterinary hospital'. An animal boarding or training establishment is a prohibited land use in the RE1 and RE2 zones.
- **Question**
- Should this development be considered at least in part as a Commercial operation with appropriate planning conditions?
- And indeed is this permissible in this zone ?
-
- **The odour assessment** is entirely reliant on human intervention and actions to reduce odours which will emanate from the site. This is not considered to be appropriate, even more so in consideration of the development site being located directly adjacent to a long established residential area. Proposed odour mitigation measures need to be review and consideration given to the use of physical mitigation measures which can be used in conjunction with those proposed.

Due to the obvious land use conflict between the proposed development and the adverse amenity impacts it will create on the adjoining residential precincts to the east and west through traffic, noise and odour, the development would be far more appropriately sited at the northern end of the race course adjacent to Travers Street. There is more than sufficient space here to accommodate the

proposal and there would be a significant buffer created between the residential areas.

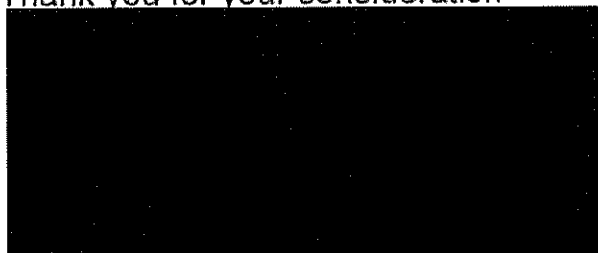
- Question Should the developer consider relocation to an alternate position so as to avoid potential conflict with neighboring residents
-
- The Statement of Environmental Effects mentions that Lot 1 DP663066 (RE1 zoned land) is currently classified as 'community land' under the Local Government Act 1993 and that 'An agreement will be required to be secured with Council for ongoing access and occupation arrangements over that applicable parcel of land'. Land classified as 'Community' ordinarily comprises of land such as public parks, reserves or sporting grounds for use by the public (i.e. for public recreation as per the land's current zoning). I believe the land would need to be 're-classified' to 'Operational' under the Local Government Act 1993 should the proposal which to utilise the allotment for private and commercial purposes. The development is not for the use of the public and is inconsistent with its current classification.

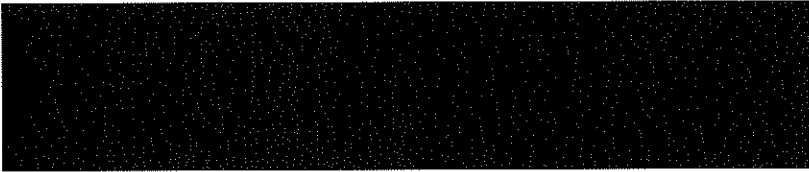
In conclusion


I would have wished to provide more comment on additional matters however time does not allow

More than any other issue the relocation of the proposed Development to the northern area facing Travers Street would placate so many of the concerns raised by the Public

Thank you for your consideration





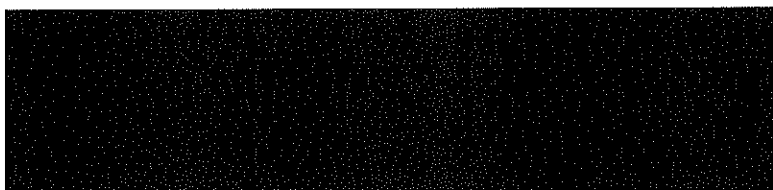
 and council staff assessing DA19/0654,
I would like to express concern regarding the application for stables at 60 Beckwith St.

My concerns relate to the issue of odour and the inconsistencies between the proposed minimal storage of on-site waste at the impact this will have on surrounding residents and sporting facilities. I am also concerned about the use of public land being utilised by developers. From the DA I gather that there is approximately half the required storage for on-site waste and that collection may only occur every 1 to 2 weeks. The DA report also states that the excess waste will be exposed if there is not sufficient covered space prior to collection. This is unacceptable in terms of odour and the pests that will be attracted to that odour. Beckwith Street is a residential area and any westerly wind will blow that odour into the homes of residents.

The proposed development would make the current sporting facilities at the velodrome untenable and unfit for purpose. The odour and the horse flies from the stables will create issues for cyclists at the velodrome and may require Council to create a similar sporting venue at another site. Rate payers would be required to pay for this. It is an unnecessary imposition on ratepayers when the developers have options of another site.

The development proposal requires the use of Crown land in order to facilitate access to the site. The proposal also states that if the driveway access is not wide enough that it further driveway will be required. Is that driveway going to be placed on what is currently the tennis court? Also on Crown land? Will this mean that in future the City will lose the ability to extend the facilities of the women's shed and the cricket club because this land has been given over to a developer? If the stables were housed at the Travis end of the MTC land then no gifting of public land would be required.





To whom it may concern,
I'm writing with concerns regarding the proposal to construct stable facilities on land between Beckwith and Kincaid Streets.



The initial letter advising of the DA made no mention of any encroachment of residents in Kincaid Street, simply stating 'stable complex, 60 Beckwith St'

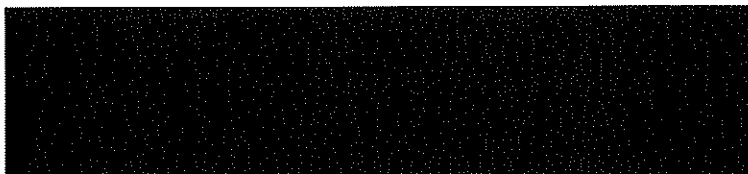
Things of concern -

- * Noise
- *Smell
- *Visual impact
- *Air quality (dust)
- *Flies
- *It's very close proximity to people playing sport on the playing field , cricketers, footballers and cyclists.
- *It's very close proximity to the cricket practice nets.

Has the land along Travers Street been considered? Very little impact on residents there.

Thank you for your consideration,





I am writing to express my concerns regarding the proposed development at 60 Beckwith Street. This proposed stable complex is massive in scale and I believe will have a negative impact on the surrounding residents, social club and leisure facilities. I have consulted with Associate Professor in Equine Medicine, Kris Hughes who has outlined the following concerns:

- An increase in production of dust containing bio-contaminants that would impact the air quality for residents in the vicinity
- As the stable complex is situated so close to sporting and leisure facilities the increase in dust will impact respiratory health, particularly considering that most winds come from the north west.
- Noise produced will effect local residents as the stables will mainly be used during the early hours of the morning
- As the planned development is set to include at least 125 horse stalls, it is expected that the smell produced would likely cause discomfort to residents and those using the existing leisure and sporting facilities

Source:

Associate Professor Kris Hughes

BVSc Hons 1

(Syd) FACVSc

Diplomate

ECEIM

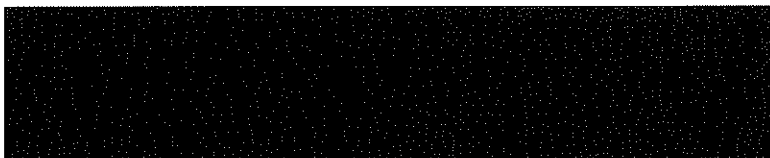
Associate Professor in Equine Medicine / Clinical Director

School of Animal and Veterinary Sciences, Charles Sturt University, Wagga Wagga Campus

- The question of storm water runoff is also a concern as a large accumulation of water occurs in the Cricket Ground car park area whenever it rains.
- this development will result in a devaluation of properties in the surrounding area.

I believe these issues could be avoided by relocating the planned complex to the Travis Street side of the MTC and away from homes.





To Whom it May Concern

DA19/0654 Proposed Stable Complex

60 Beckwith Street, Wagga Wagga

I have had independent advice on the DA for the proposed Stable Complex at 60 Beckwith St, Wagga Wagga. I do not agree with the placement of the proposed facilities as I feel it will have severe ongoing negative impacts for local residents.

My independent advice has highlighted the following issues with the development application which I am using to support my objections regarding the DA19/0654 for the construction of a stable complex at 60 Beckwith Street, Wagga Wagga.

Statement of Environmental Effects

4.2 Justification

The report states that alternate locations with the MTC land were considered, however the subject site was identified as providing minimal expected impact to the local area. This does not take into account the potential significant impact of early morning operations at the proposed stables, including increased traffic noise on Beckwith Street and noise from the intensification of the use of the site, ie. operational and plant noise. It does not address the likely lesser impact of traffic and operational noise on residential areas should the proposed stables be located on Travers Street, opposite an industrial area. It further states that the proposed siting will avoid creating additional access to Kincaid and Travers streets, which carry significant traffic volumes at peak times. Peak times are not defined in the SEE. This will be discussed later in these comments.

4.3 Site preparation/demolition

This section refers to the removal of an existing shed. The nature of this shed is unknown, however no mention is made of the potential of this shed to contain asbestos. No mention of consulting the site's asbestos

register is made, and the potential requirement for an Asbestos Management Plan is not addressed.

4.6.3 Hours of operation

The following hours are presented:

24 hours early 7 days per week

Normal business hours: 4.30am-5pm

MTC races: 11am-7pm

Away meetings: 9.30am-8pm

Regardless of the above, times may vary. No indication of these variances, ie. activities or times, is given.

From the above:

Plant (air conditioning, etc) will be operating 24 hours, 7 days per week.

No details of any proposed plant have been presented.

Horse training will commence at 4.30am. No details of traffic numbers or vehicle types at this time are presented. There is no discussion of arrival times of staff participating in training.

7.3 Dust

The report states that ongoing management of operations will mitigate and control potential areas of dust generation. No further details are presented.

7.4 Noise

The SEE states that the nature and operation of the stabling activities will not be foreign to the local area. There are currently no stabling activities adjacent to residential premises on Beckwith or Kincaid streets. There are, however stabling activities adjacent to industrial areas on Travers Street.

No acoustic report has been submitted. Potential impacts include:

Plant (air conditioning, etc) operating 24 hours, 7 days per week.

Horse training beginning at 4.30am. No traffic numbers are given for early morning operations, although this would appear to be the highest impact times of operation. The Traffic Impact Assessment gives numbers of vehicle trips by trainers, stable hands and riders attending the site daily for early morning training, equating to 38 vehicle arrivals. According to the Traffic Impact Assessment, semi-trailers will deliver horses, which will then walk on sealed roads to the stables. No times are given for these deliveries. As the premises is to operate 24 hours 7 days per week, further details of this activity are required.

The intensification of use of this portion of the site, directly opposite a residential area where currently no such use occurs requires a Noise Impact Assessment. This report should include, but not be limited to, sleep disturbance assessment, including both pre 7am traffic and operational noise, air conditioners, compressors, etc.

Waste Management Plan

Table 2.1 of the WMP states that 60m³ of manure and bedding will be generated per week and removed weekly. No details of vehicle/s required to remove this volume or removal hours are given.

Section 4.2 states that bedding and manure are to be removed from stables daily and placed into a 'covered manure bunker'. Plans show 3 separate manure hoppers adjacent to tables 1, 2 and 3. No manure hopper for stable 4 is shown. Further plans in the Traffic Impact Assessment show the volume of the manure hoppers as 12 m³. This gives a total storage of 36m³. This is approximately half of the estimated volume of manure/ bedding to be generated weekly. No details of any further manure storage areas/hoppers/storage capacity are presented.

Section 4.6.2 states that drainage from roofs will be directed to the race track's onsite dam. Supporting plans show stormwater drainage from horse yards being directed to Council's stormwater system. This provides potential for stormwater pollution from these yards being directed offsite.

Traffic Impact Assessment

According to the TIA, the development is likely to generate 104 additional daily traffic movements on local roads. The AM traffic peak between 8am and 9am will be 39 vehicle movements. The report gives numbers of vehicle trips by trainers, stable hands and riders attending the site daily for early morning training, equating to 38 vehicle arrivals. While this may not be significant in traffic terms at this time of the day, it has potential to cause noise/sleep disturbance issues for adjacent residents. The impact of these minor traffic movements on the areas facing Travers Street is likely to be minimal due to the industrial land use opposite the racecourse. As the report states, traffic generation overall will be minimal. Therefore overall traffic effects on Travers Street will be minimal.

Odour Assessment

Table 2.1 of the OA gives the nearest receptor to the south of the development as 128 Kincaid street. A closer receptor is located at 35 Dobbs Street.

Section 4.1.1 states that manure will be stored in a covered hopper prior to removal every 1-2 weeks. This contradicts the Waste Management Plan which calls for weekly disposal.

Presented plans show 3 waste hoppers, ie. 3 point sources of odour.

Figure 6.1 shows projected odour emission concentrations from the site as a whole. No assessment of the point sources is presented. As stated previously, these 3 point sources are inadequate to hold the projected 60m³ of manure and bedding estimated to be produced weekly. No assessment of odour from any required overflow storage is presented.

Section 7 of the OA states that manure hoppers are to be closed whenever possible. To ensure odours from these point sources are adequately controlled, the OA should state that these hoppers should be closed at all times, unless being loaded/unloaded. This section also refers to a complaint management system for receiving complaints and

providing feedback to the community. No provisions for corrective actions to address odour issues are referred to.

Further to the above, there has been no assessment of the impact of light spill from the development on adjacent residential premises. As no details have been presented, an assessment of compliance with Australian Standard AS4282-1997 'The Control of the Obtrusive Effects of Outdoor Lighting' should be requested.

Conclusion

The presented information is incomplete. Prior to making a determination on this development application, Council should request the following information:

A Noise Impact Assessment including, but not necessarily limited to, a sleep disturbance assessment, including pre 7am traffic, all vehicle deliveries and operational noise, including the location and nature of any proposed plant, ie. air conditioners, compressors, etc.

A revised Waste Management Plan, detailing:

The provision of waste containers adequate for the stated weekly volume of manure/bedding, ie 60m³.

Measures to be employed to prevent stormwater pollution from entering Council's stormwater system from horse yards.

A revised Odour Assessment, including:

Reassessment of odour emissions from point sources, ie any manure/bedding hoppers/stockpiles.

Waste removal to be weekly.

Complaint management system to include provisions for corrective actions to address odour issues.

Waste hoppers to be closed at all times, unless being loaded/ unloaded.

The inclusion of the 35 Dobbs Street as the closest residential receptor to the south.

A modified Statement of Environmental Effects, including:

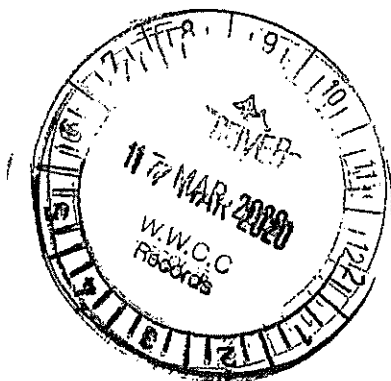
Details of proposed dust control and mitigation measures.

Relevant details from the above new and modified reports.

An assessment of compliance with Australian Standard AS4282-1997 'The Control of the Obtrusive Effects of Outdoor Lighting' should be requested.

An assessment of locating the facility at an alternate site, ie. on Travers Street.





Dear Sir/Madam,

We are **STRONGLY OPPOSED** to DA19/0654

Proposed Stable Complex. 60 Beckwith St. Wagga Wagga.

We are in a Residential area!!

Please Consider, our concerns:

1. Noise.

"Details of Proposal" Section 4:6:3 Hours of Operation.

States 24/7!!!! Mainly 0430-1700hrs.

Increased noise as jockeys arrive at work, horses transported before and after race meetings, people involved in general working duties.

What about the noise from velodrome (loudspeaker, music), music from sportsman hotel, fireworks from RSL. Will this upset horses?

2. Traffic.

Danger from increased traffic on Beckwith St, already has high volume of traffic.

Danger to people catching public transport, walking for exercise, walking to and from clubs, entertainment.

3.Odour.

Increased odour from 125+ horses, effluent and water

4. Flies

Increased flies due to horses, heat, manure. Flies carry disease.

5. Dust

Increased dust from traffic and general workings, movement of people and horses.

6. Devaluation of Properties.

Devalue my property ,as people don't wish to live to horses, and all above points that go with.

7.Environmental Impact Study.

Section 7.7 Flooding.

We note it says "not in a flood zone"! , Our house insurance says we are in a flood zone!!

We suggest the stables are built on Travers St, away from residential. Large enough area to have one way in ,one way out. Also closer to parading circle for races.

The MTC had stables in Slocum St, they leased, why did they stop?

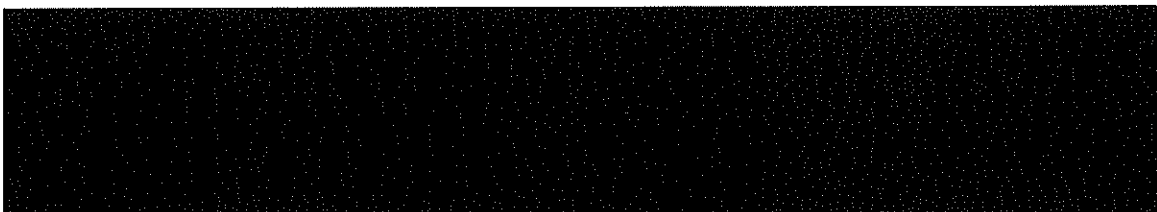
Maybe look at buying some of land from TOLL, as is unused.....

We are strongly against approval of this application.

We await your response.

Regards





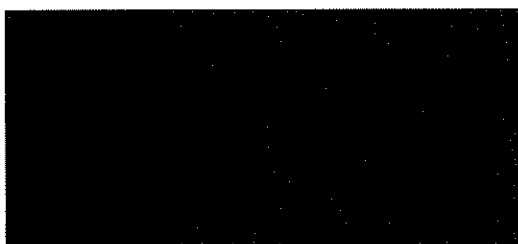
To whom it may concern:

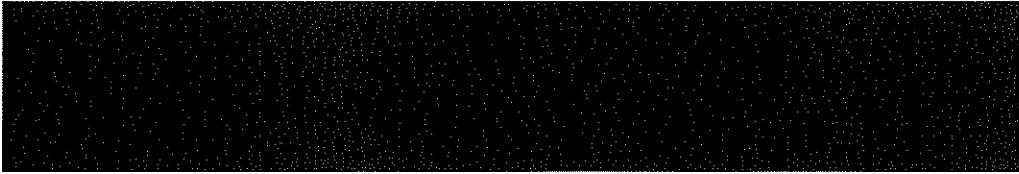
As a resident _____, I would like raise objections on the above mentioned Application for a proposed Stable Complex.

I have the following concerns especially as this is already a residential area.

- Added traffic can be a danger.
- As stated in the proposal "The normal business hours are from 4.30am to 5pm. MTC race days are from 11am to 7pm with away race meetings 9.30am to 8pm. Due to the nature of the development and industry, times may vary due to travel times, race times and catering to the horses. Track work is conducted during the morning with light duties, office procedures and attending to the horses in the afternoon". This is my major concern.
- The existing Sportsman Hotel very rarely trades past 12 midnight, and they can jeopardise their license if they don't comply, this will not be the case with the complex.
- Have concern about the smell given the size of the proposal.
- This will mean flies especially in the hotter months.
- There will definitely be devaluing of the properties in Beckwith Street.

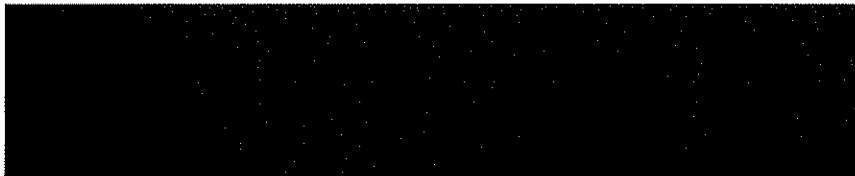
I don't know why the complex has to be in Beckwith Street and not "closer" to the existing MTC Buildings in Travers Street.





Sent from my iPad

Begin forwarded message:



Reasons we strongly object to 125 stables at 60 Beckwith Street.

1. Increased traffic -horse floats,trucks,jockeys trainers,feed trucks ,waste trucks,vets owners .Plus at the moment there is not one driveway on that side of the road to stop the flow of traffic which is getting a lot busier due to the Estella growth.

It is on a bus route ,and a popular walking track.Also a danger for the many young race goers walking back to town after a meeting where their judgement is impaired.

2. Noise- Jockeys start work around 4.30am (remember 125 stables) plus trainer and staff. Horses returning at all hours after out of town meetings .

3. Smell and flies - This will impact everyone RSL bowlers ,cricket ground ,rugby the sportsman outdoor eating ,not to mention it is 3 blocks of the Main Street that now boast many restaurants.

4. Devaluing our property the push for more urban living did not mean horse stables.

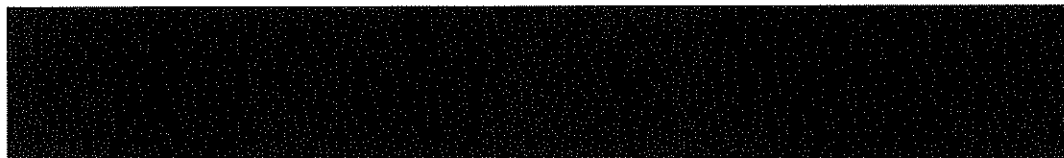
5. MTC - lack of foresight To obtain stables already attached to MTC (renovators warehouse) should not be our problem. There lack of care for residents of Beckwith Street with the on going dust problems yes we are in drought ! but the track is lovely and green they won't even use a water truck on race meeting to reduce dust caused by the cars racing around the track.

6. Ratepayers We do not understand why the MTC would want the stables so close to residential central living the entertainment and food part of town,instead of the Travers Street end.It would be less impact for it to be opposite Toll for residents and traffic ,or maybe they just want it there so it keeps the horses away from their own entertainment venue (Rockin at the Races).

The MTC says the Travers end is to low for the sewer to handle 125 stables well that's what pumps are for ,it is not lost on us that the week the sewer up grade was

completed we received in the mail the DA application





Attention Town Planning section.

Dear Sir/Madam,

Whilst the proposed development will front Beckwith St it is noted to also have a significant visual impact from Kincaid St. The RSL Club will look over the proposed stables, the house on the corner of Dobbs, 130, 128 and 126 Kincaid St will have the visual impact of the development. Whilst it maybe well designed it will not be as attractive as the open space view

The visual impact whilst being a concern is somewhat minor and somewhat "not in my backyard".

The potential smell and noise is a greater concern. Training of horses can start as early as 4am and noise will effect the nearby houses.

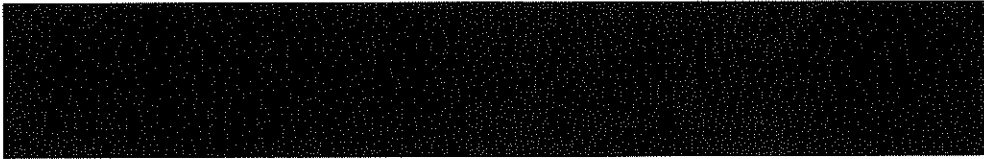
Houses in Beckwith St will also be negatively impacted and maybe to a greater degree than those in Kincaid St.

The proposed development will have an undesirable impact on nearby houses of both Kincaid and Beckwith Sts.

The solution is so easy, locate it on the corner of Beckwith and Travers St. opposite Toll Depot. Why is this not the council preferred site? Existing MTC access could be used and development is further from urban development.

Regards,





DA19/0654 Proposed Stable Complex

60 Beckwith Street, Wagga Wagga

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Table 2.1 of the OA gives the nearest receptor to the south of the development as 128 Kincaid street. A closer receptor is located at 35 Dobbs Street.

Section 4.1.1 states that manure will be stored in a covered hopper prior to removal every 1-2 weeks. This contradicts the Waste Management Plan which calls for weekly disposal.

Presented plans show 3 waste hoppers, ie. 3 point sources of odour. Figure 6.1 shows projected odour emission concentrations from the site as a whole. No assessment of the point sources is presented. As stated previously, these 3 point sources are inadequate to hold the projected 60m³ of manure and bedding estimated to be produced weekly. No assessment of odour from any required overflow storage is presented.

Section 7 of the OA states that manure hoppers are to be closed whenever possible. To ensure odours from these point sources are adequately controlled, the OA should state that these hoppers should be closed at all times, unless being loaded/unloaded. This section also refers to a complaint management system for receiving complaints and providing feedback to the community. No provisions for corrective actions to address odour issues are referred to.

Further to the above, there has been no assessment of the impact of light spill from the development on adjacent residential premises. As no details have been presented, an assessment of compliance with Australian Standard AS4282-1997 'The Control of the Obtrusive Effects of Outdoor Lighting' should be requested.

Conclusion

The presented information is incomplete. Prior to making a determination on this development application, Council should request the following information:

A Noise Impact Assessment including, but not necessarily limited to, a sleep disturbance assessment, including pre 7am traffic, all vehicle deliveries and operational noise, including the location and nature of any proposed plant, ie. air conditioners, compressors, etc.

A revised Waste Management Plan, detailing:

The provision of waste containers adequate for the stated weekly volume of manure/bedding, ie 60m³.

Measures to be employed to prevent stormwater pollution from entering Council's stormwater system from horse yards.

A revised Odour Assessment, including:

Reassessment of odour emissions from point sources, ie any manure/ bedding hoppers/stockpiles.

Waste removal to be weekly.

Complaint management system to include provisions for corrective actions to address odour issues.

Waste hoppers to be closed at all times, unless being loaded/ unloaded.

The inclusion of the 35 Dobbs Street as the closest residential receptor to the south.

A modified Statement of Environmental Effects, including:

Details of proposed dust control and mitigation measures.

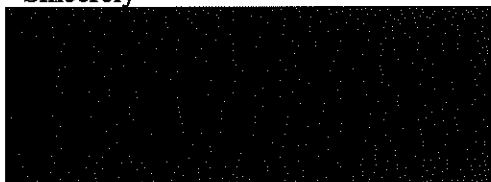
Relevant details from the above new and modified reports.

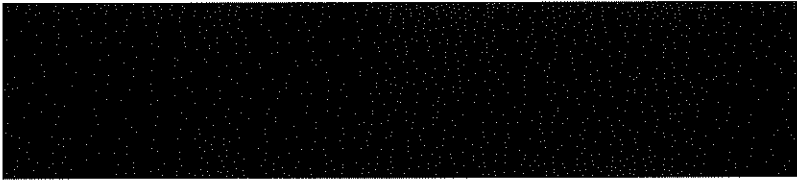
This information is provided from Wagga Wagga City Council

An assessment of compliance with Australian Standard AS4282-1997 'The Control of the Obtrusive Effects of Outdoor Lighting' should be requested.

An assessment of locating the facility at an alternate site, ie. on Travers Street.

Sincerely

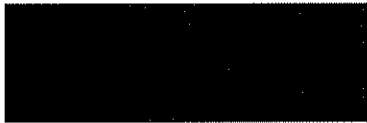




I would like to object to size, scale, health effects and location of the above proposal on the following grounds:

The area is a residential area:

- Risk of disease transmission as located adjacent to many homes / local hotel / RSL / cricket ground / cricket nets where children play (Hendra, other equine diseases).
- Increased smell from animals/ feed and "manure hopper".
- Noise from early morning activity.
- Increased heavy traffic with horse trucks and vehicles.
- Availability of alternate location of stables away from built up area on the MTC land on Travers St or expand in to the carpark on Travers St, unnecessary to locate this facility close to homes (see attached).



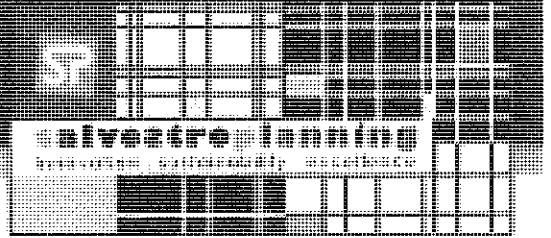
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STATEMENT OF ENVIRONMENTAL EFFECTS



Alternate area away from houses.

Proposed Stable Complex

60 Beckwith Street, Wagga Wagga NSW 2650

Lot 2, DP840187 & Lot 1, DP663066 & Lot 7314, DP1141841



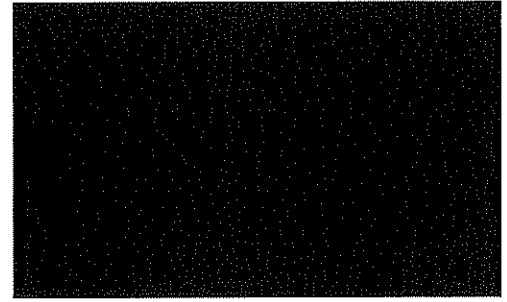
Prepared for MTC
Rev 2.0 November 2019



I wish to make a submission regarding the above development application.

I do not object to the development of the site overall and hope the proposed landscaping will be implemented as indicated as that would be a visual improvement to the site. My concern relates to the extended hours that traffic may use Crampton Street for ingress and egress of the facility. The traffic study has not identified the numbers or the times that trucks towing horse floats (empty or full) will access the premises. These vehicles could generate unnecessary noise in a residential street before 7am which I believe is a reasonable start time for vehicular traffic of this nature and which the study indicates would be the commencement of the peak period in the morning. I have no issues with occasional cars used by trainers or jockeys for early morning training entering the facility, but would respectfully request that Council either limit the delivery time of horse floats being towed until after 7am or restrict their access to and from the facility via Beckwith Street before 7am. Similarly, I would like Council to prohibit the use of Crampton Street for trucks/horse floats etc to access the facility after say 8pm or 9pm at night, thereby preserving the residential amenity in the residential areas in Crampton St.



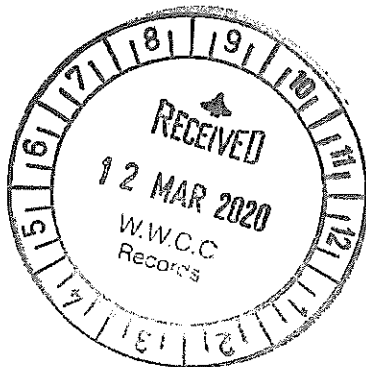


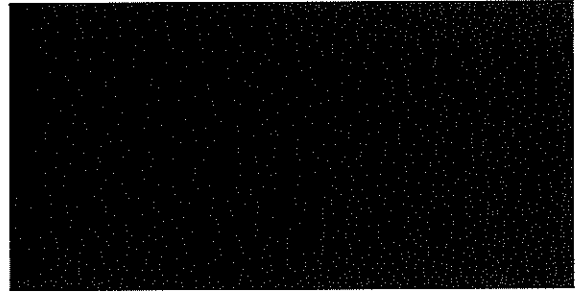
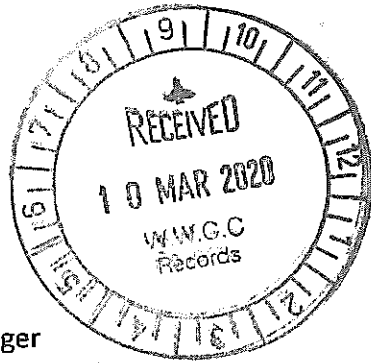
Attn Robyn Bradley .

Re Appln. No 19/0654
File No. 0/2019/0654

With reference to the proposal Stable Complex
60 Beckwith St Wagga Wagga I wish to object
to this because horses bring flies and smells, not nice
to live near.

yours faithfully





The General Manager
Wagga Wagga City Council

Dear Sir,

Re: Application DA 19/0654 – Stable Complex – Attention: Robyn Bradley.

I refer to my letter of objection dated 4 March, copy attached, and would like to add to that submission please.

I have considerable concerns about some of the statements in the application which are confusing and/or misleading and require clarification:

1. 4.2 Justification for Development, in part, states
“Alternate design locations within the MTC land were considered however the subject site was identified as providing a suitable area with minimal expected impact on existing operations and the general local area.”
The general local area, ie. near neighbours could well be impacted but this seems to be less important than upsetting existing operations.

If the MTC wishes to be a responsible neighbour, there is ample MTC land available facing Travers Street for the development with the only across the road neighbours being the two trucking companies who will not be affected by activities at 4.30am. There will be additional traffic created here but with some not too difficult traffic treatment will solve this problem.

The Application does not point out that opposite the proposed development in Beckwith Street there are some 16 residential units and around 12 homes, (which will total about 60 residents, including children) who could be adversely affected by this development each and every morning – this is not fair and reasonable.

4.2 also states “ Historically the surrounding lands have accommodated stabling and horse training areas. However, a significant number of older stable facilities have been replaced with residential development primarily due to residential land use demands of the city’s continued growth”.

I am not sure what the author is trying to say, but to me it indicates if new owners are removing stables, they want nothing to do with stabling of horses and are moving to the location for quiet enjoyment. I must admit I have no idea where these new residential developments are as most of the houses have been there for many years.

2.

4.2 again " The distance of the site from the main event area also better considers the race horses wellbeing by providing a buffer from large crowds during events such as the Gold Cup" – I think the Gold Cup is 2 or 3 days a year – the potential noise to residents is 365 days a year – which is more important? (and how have horses survived in the past).

2. 7.1 Site and Locality Analysis – in this section very scant reference to the neighbours across the road " Land opposite the site in Beckwith Street contains a mixed density residential dwellings" – that's it – no reference whatsoever to the number of persons who could be adversely impacted by this development – as stated above, I believe about 60.

3. 7.4 Noise – An ill informed (and if I may say an arrogant statement) "The nature and operation of the stabling activities will not be foreign to the local area where stabling activities have occurred since the MTC began operations." - which suggests all residents in the area are used to being woken at 4.30am -
the only horse sounds I have heard are on race day and that is only briefly during the actual race.

Conclusion

Any proposal which will provide 30 new fulltime positions should be supported due to the economic benefits to the community.

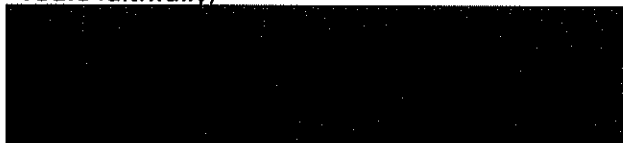
Council will be aware it has a responsibility to weigh up all considerations in considering an application and I believe the potential impact on near residents at 4.30am each morning, does not allow the application to be recommended for approval.

There is no doubt the proposal could be relocated to face Travers Street where there is ample land and no neighbours which will be affected and suggest this should be the recommendation to Council given all the circumstances.

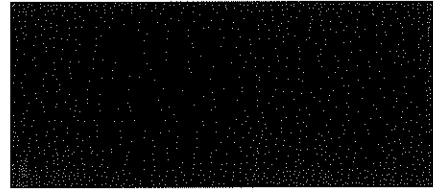
I believe relocating the complex to Travers Street will save everyone a lot of "heartache" in the future.

I do not know how many objections you have received but please bear in mind I am aware letters have been placed in units letterboxes addressed to the occupant who are generally tenants and doubt if they have any interest in the proposal.

Yours faithfully,



copy
/



The General Manager
Wagga City Council.

Dear Sir,

RE: Application No. DA19/0654 – Stable Complex – Contact: Robyn Bradley.



- i. Parking – the parking proposed (46 spaces) appears to be inadequate given the number of persons and vehicles (plus large horse floats/trucks) which might be attending the complex at any one time. The concern is if there are inadequate car /truck spaces provided on site, there will inevitably be an overflow of vehicles parking in Beckwith Street and Crampton Street which will impact on neighbouring properties, particularly on garbage collection days. Although it happens infrequently when major events occur at the Sportsman's Club Hotel some of their patrons park in Crampton Street but is tolerable due to infrequent events however the proposal by the Turf Club could result in this becoming the norm and commencing at 4.30am each morning, 7 days per week, 365 days per annum.
- ii. Noise – from vehicle movements and staff at 4.30am onwards each day. Presently in this area there is no noise commencing at 4.30am – if the proposal is accepted this will change with “30 additional full time positions” presumably commencing work at 4.30am arriving in their vehicles, opening and closing car doors, greeting each other as persons usually do, commencing some machinery(? This is not mentioned in the submission) and this must surely impact on neighbours sleeping habits. Further in regard to vehicle movements, part of the submission refers to “avoiding creating additional access to Kincaid Street or Travers Street which carry significant traffic volumes at peak times” but further in the submission 7.4, “Beckwith and Kincaid Street are high traffic local roads that carry a mixture of light and heavy vehicles” – so this suggests it is OK to add extra traffic to Beckwith Street which will impact on residents at 4.30am each morning – “104 vehicle movements per day, 39 in peak am”
- iii. The submission refers to the RSL club, Sportsman Club Hotel the cricket ground and cycling in the area, apparently attempting to suggest the proposal is similar to what currently exists, which is nonsense as none of these takes place at 4.30am every day.
- iv. Probably the best statement in the submission “ Generally stabling activities do not generate excessive noise impacts” – this provides little comfort to neighbours who could be impacted each morning of the year and what happens if it does generate excessive noise? And who decides what is “excessive”?

I certify I have never made any donations to any political party or Councillor/s.

Yours faithfully,

