

STATEMENT OF ENVIRONMENTAL EFFECTS



Proposed Stable Complex

60 Beckwith Street, Wagga Wagga NSW 2650

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



Prepared for MTC
Rev 2.1 July 2020



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TABLE OF CONTENTS

1	INTRODUCTION	1
1.1	Brief Overview	1
1.2	Supporting Plans and Documentation.....	2
2	APPLICANT AND LAND OWNERSHIP	3
3	SUBJECT LAND	3
3.1	Subject Land and Locality	3
3.2	Site Characteristics.....	6
3.2.1	Surrounding Land.....	6
3.2.2	MTC Racecourse.....	6
3.2.3	Connections/Transport Network	6
3.2.4	Air Quality Monitoring Station.....	6
3.3	Site History	7
4	DEVELOPMENT PROPOSAL.....	11
4.1	Proposal Details	11
4.2	Justification of Development.....	13
4.3	Site Preparation/Demolition	15
4.4	Subdivision and Easement	15
4.5	Heritage Interpretation.....	16
4.6	Details of Proposal.....	16
4.6.1	Staging	16
4.6.2	Staff	16
4.6.3	Facilities	17
4.6.4	Hours of Operation	18
4.6.5	Operational Activity Details	18
4.6.6	Traffic Generation, Car Parking and Access	19
4.7	Safety and Security	20
4.8	Streetscape/Urban Design/Landscaping.....	20
4.8.1	Beckwith Street	20
5	INFRASTRUCTURE.....	21
5.1	Provisions of Essential Services.....	21
5.2	Waste Management	23
6	PLANNING POLICIES AND GUIDELINES	23
6.1	State Environmental Planning Policies	23
6.1.1	Integrated Development.....	23
6.1.2	Biodiversity Conservation Act 2016 No.63	25
6.2	State Environmental Planning Policies	27
6.3	Wagga Wagga Local Environmental Plan (LEP) 2010.....	27
6.3.1	Land Use Zoning	28
6.3.2	Permissibility	29
6.3.3	Consideration of Relevant LEP Clauses	30
6.3.4	Heritage Conservation – LEP Clause 5.10	30
6.4	Wagga Wagga Development Control Plan 2010 (DCP).....	33
6.4.1	DCP Variations.....	37
6.5	S94 & S64 Calculations	37
6.5.1	Stormwater	37
6.5.2	Sewer	37
6.6	Additional Policies & Guidelines.....	38
6.6.1	Welfare Guidelines for Australian Thoroughbred Horse Racing	38
6.7	Other Relevant S4.15 Matters for Consideration	38
7	ENVIRONMENTAL IMPACT ASSESSMENT	39
7.1	Site and Locality Analysis	39
7.2	Community Consultation	40

7.3	Dust	42
7.4	Noise	43
7.5	Odour	44
7.6	Bushfire.....	45
7.7	Flooding	45
7.8	Flora and Fauna	46
7.9	Natural Resources Sensitivity	46
7.10	Site Contamination.....	47
7.11	Economic and Social Impact.....	49
7.12	Site Suitability	49
7.13	Public Interest	49
7.14	ESD Principles	49
7.15	Other Impact Considerations.....	50
7.16	Statement of Environmental Effects Summary Table	51
8	CONCLUSION	52

TABLE OF TABLES

Table 1: Proposed MTC Stables Complex - Functional Component	1
Table 2: Proposed MTC Stables Complex – Veterinary Clinic Functional Component	1
Table 3: Plans and Support Documentation	2
Table 4: Proposed MTC Stables Complex - Functional Components	11
Table 5: Proposed MTC Stables Complex – Veterinary Clinic Functional Component	12
Table 6: Applicable Integrated Development	24
Table 7: SEPPs Applying to the Land and Proposal	27
Table 8: Relevant LEP 2010 Zone Objectives	29
Table 9: Relevant DCP 2010 Controls	33
Table 10: DA Public Notification Submissions and Responses Summary	40
Table 11: Contaminated Land Consideration – Initial Evaluation Data	47
Table 12: Statement of Environmental Effects	51

TABLE OF FIGURES

Figure 1: Subject Land (Source: WWCCGIS 2019)	3
Figure 2: Location Map (Source: Google Maps 2019)	4
Figure 3: Extract of DP840187 (Source: WWCCGIS Deposited Plans 2019)	4
Figure 4: Extract of DP663066 (Source: WWCCGIS Deposited Plans 2019)	5
Figure 5: Extract of DP1141841 (Source: WWCCGIS Deposited Plans 2019)	5
Figure 6: Historical Aerial of Subject Land – 2018 (Source: WWCCGIS 2019)	8
Figure 7: Historical Aerial of Subject Land – 2016 (Source: WWCCGIS 2019)	8
Figure 8: Historical Aerial of Subject Land – 2014 (Source: WWCCGIS 2019)	9
Figure 9: Historical Aerial of Subject Land – 2012 (Source: WWCCGIS 2019)	9
Figure 10: Historical Aerial of Subject Land – 1990 (Source: WWCCGIS 2019)	10
Figure 11: Historical Aerial of Subject Land – 1971 (Source: WWCCGIS 2019)	10
Figure 12: Historical Aerial of Subject Land – 1944 (Source: WWCCGIS 2019)	11
Figure 13: 3D image of proposed entrance from Beckwith Street (Source: Sewell Design 2019)	12
Figure 14: 3D image of proposed walker and sand rollover (Source: Sewell Design 2019)	13
Figure 15: 3D image of proposed stables and car parking (Source: Sewell Design 2019)	13
Figure 16: Location of previous and current stables (Source: WWCC GIS, SP & MTC)	14
Figure 17: Beckwith Street proposed frontage treatment – 3D image (Source: Sewell Design 2019)	20
Figure 18: NBN Assets Map (Source: DBYD 2019)	21
Figure 19: Riverina Water County Council Assets Map (Source: DBYD 2019)	21
Figure 20: APA Assets Map (Source: DBYD 2019)	22
Figure 21: Essential Energy Assets Map (Source: DBYD 2019)	22
Figure 22: WWCC Sewer and Stormwater Assets Map (Source: WWCCGIS 2019)	23
Figure 23: Biodiversity Values Threshold Result Summary (Source: DP&E 2020)	26
Figure 24: Biodiversity Values Map (Source: DP&E 2020)	26
Figure 25: Land Zoning Map (Source: WWCCGIS 2019)	28
Figure 26: Heritage Items Map (Source: WWCCGIS 2019)	31
Figure 27: Conservation Area Map (Source: WWCCGIS 2019)	31
Figure 28: Example of site embellishment (Source: Sewell Design 2019)	32
Figure 29: AHIMS Search Extract (Source: OEH 2019)	32
Figure 30: Photo of site (Source: SP 2018)	39
Figure 31: Bushfire Map extract (Source: WWCCGIS 2019)	45
Figure 32: Flooding map extract – 2017 model (Source: WWCCGIS 2019)	45
Figure 33: Wildlife Atlas Map (Source: OEH Wildlife Atlas 2019)	46
Figure 34: Biodiversity, Riparian Lands & Waterways & Groundwater Sensitivity Map (Source: WWCCGIS 2019)	47
Figure 35: Site photos (Source: SP 2018)	48
Figure 36: Potentially Contaminated Register Mapping (Source: WWCCGIS 2019)	49

Proposed Stable Complex

60 Beckwith Street, Wagga Wagga NSW 2650

1 INTRODUCTION

1.1 Brief Overview

This is a revised Statement of Environmental Effects issued with revised support documentation following receipt of comments during the public exhibition period.

The revised proposal includes the following changes:

1. Deletion of water walker and exercise pool
2. Further details on the proposed Veterinary building and use
3. Inclusion of an Acoustic Assessment Report
4. Additional information in relation to odour & dust management, waste management, staffing and site operation, stormwater management and biocertification.
5. Responses to specific questions raised during the public exhibition period.

The Statement of Environmental Effects (SEE) has been prepared in support of the addition of a proposed stable complex to the Murrumbidgee Turf Club racecourse, to be located on land fronting Beckwith Street, Wagga Wagga. The subject development land is identified as comprising parts of Lot 2 DP840187, Lot 1 DP663066 and Lot 7314 DP1141841, with respective street addresses of 140 Travers Street, 60 Beckwith Street and 42 Beckwith Street, Wagga Wagga.

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.

The proposal involves the construction of four stable areas to accommodate various activities including training, stabling and care for race horses in association with the operation of the racecourse. Various components are as described below:

Table 1: Proposed MTC Stables Complex - Functional Component

Component	Stable 1	Stable 2	Stable 3	Stable 4	Total
Stalls	32	32	32	29	125
Feed Store	2	2	2	2	8
Office	1	1	1	0	3
Lunch Room	1	1	1	0	3
Toilets/Shower	2	2	2	1	7
Feed Room	1	1	1	0	3
Tack Room	1	1	1	1	4
Wash Bay	2	2	2	2	8
Tie-Up Rooms	6	6	6	4	22
Fresh Bedding Hopper	1	1	1	1	4
Soiled Bedding Skip Bin	1	1	1	1	4
Walking Machine (10m)	1	1	1	0	3
Sand Roll Over (10m)	1	1	1	0	3
Veterinary Clinic	0	0	0	1	1

Further to the Veterinary Clinic listed above, the various components are as described below:

Table 2: Proposed MTC Stables Complex – Veterinary Clinic Functional Component

Component	Total
Procedures Room	1
Toilets/Shower	3
Laboratory	1
Office	4
Sterilizing	1
Store	1

Waiting	1
Rec	1
Administration	1
Multi Purpose Room	1

Other proposed development activities involved with the establishment and operation of this complex, in addition to the above, include:

- A private specialised equine veterinary clinic facility (320m²)
- 22m x 10m external storage shed
- 22m x 5m external storage shed
- New driveway access from Beckwith Street including security gates
- Internal access road to suit large vehicles and accommodate turning paths
- 45 car parking spaces, including 1 disabled space
- 1 x heavy vehicle parking space/loading/unloading area
- 4 x internal parking areas for vehicle/horse floats
- Associated landscaping & fencing improvements
- Site preparation works including demolition of an existing shed

The proposal is supported by specialist reports in relation to Odour Impact, Traffic Impact, Noise Impact and Waste Management, which do not raise any significant issues that would impede the approval of the development on the subject site.

There are no adverse environmental impacts identified in the SEE that would prevent favourable consideration of the development proposal on the subject site, subject to Council's full assessment and determination.

1.2 Supporting Plans and Documentation

The SEE shall be read in conjunction with accompanying plans and support documentation as listed below in Table 1.

Table 3: Plans and Support Documentation

Attachments			
No.	Description	Rev	Prepared By
1	Proposal Plan Set – 5460 – 22/07/2020 & 170565 – 23/07/2020 5460 – Cover Page 5460-1 – Overall Site and Locality Plan 5460-2 – Stables 1, 2 & 3 – Typical Ground Floor Layouts 5460-3 – Detailed Floor Plans and Elevations - Details 5460-4 – Stables 4 & Veterinary Clinic – Ground Floor Layouts 5460-5 – Stables 4 & Veterinary Clinic - Elevations Sheet Number C1 – Locality Plan Sheet Number C2 – Proposed Site Plan Sheet Number C3 – Proposed Stormwater and Sewer Plan Sheet Number C4 – Overland Flow Path Plan Sheet Number C5 – Turning Paths Sheet Number C6 – External Lighting Plan	G	Darryl Forbes-Taber Building Design Xeros Piccolo Consulting Engineers
2	Site Analysis Plan – 16063 – 24/10/19	A	Salvestro Planning
3	Soil and Water Management Plan - 16063 – 24/10/19	A	Salvestro Planning
4	Planting Schedule and Artists Impression Images, Walkthrough Movie – 19054 – 18/08/19	A	Sewell Design
5	Odour Assessment - 23/10/19	0	GHD
6	Response to RFI – 17/07/20	-	GHD
7	Traffic Impact Assessment – 18/07/20	E	Peter Meredith Consulting
8	Waste Management Plan – 18-376 – 24/07/20	Final	NGH Environmental
9	Acoustic Assessment Report – 22/07/2020	1	GHD
10	Support Letters	-	Various

2 APPLICANT AND LAND OWNERSHIP

The applicant is the Murrumbidgee Turf Club and the site landowners include *The Wagga Wagga Race Course Trust* and *The Council of the City of Wagga Wagga* as trustees. The MTC Directors, Council and Crown Lands have given their consent for the proposal as shown on the relevant forms submitted with this SEE.

3 SUBJECT LAND

3.1 Subject Land and Locality

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.



Figure 1: Subject Land (Source: WWCCGIS 2019)

The subject site forms part of the existing MTC Racecourse complex and is located on the western side of Beckwith Street. The proposed development site will have a total of 160m of street frontage to Beckwith Street. The general location of the land is shown in the figure below, relative to the CBD of Wagga Wagga.

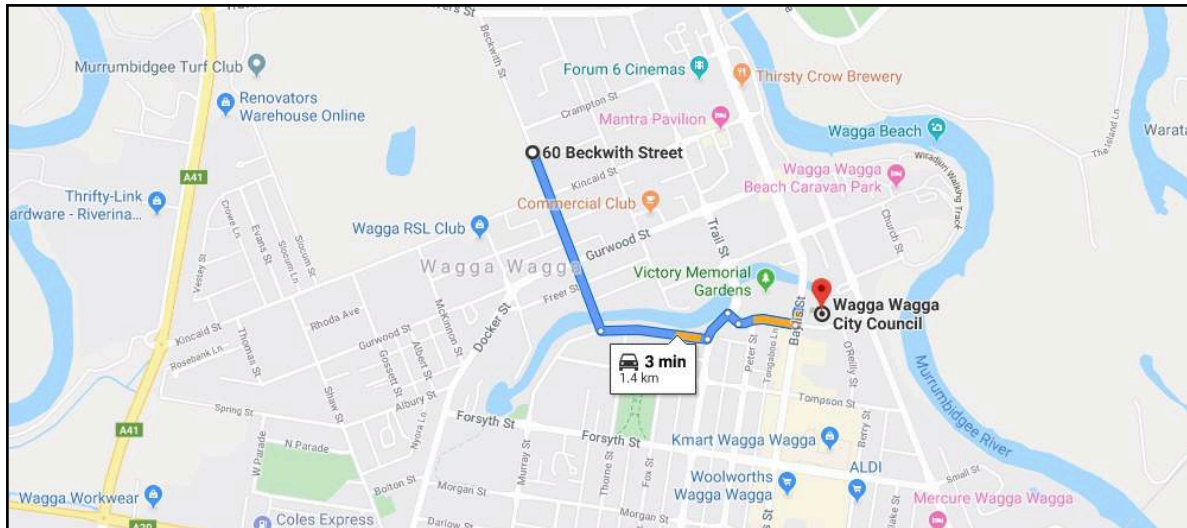


Figure 2: Location Map (Source: Google Maps 2019)

The site currently has no easements as shown in the DP extracts below.

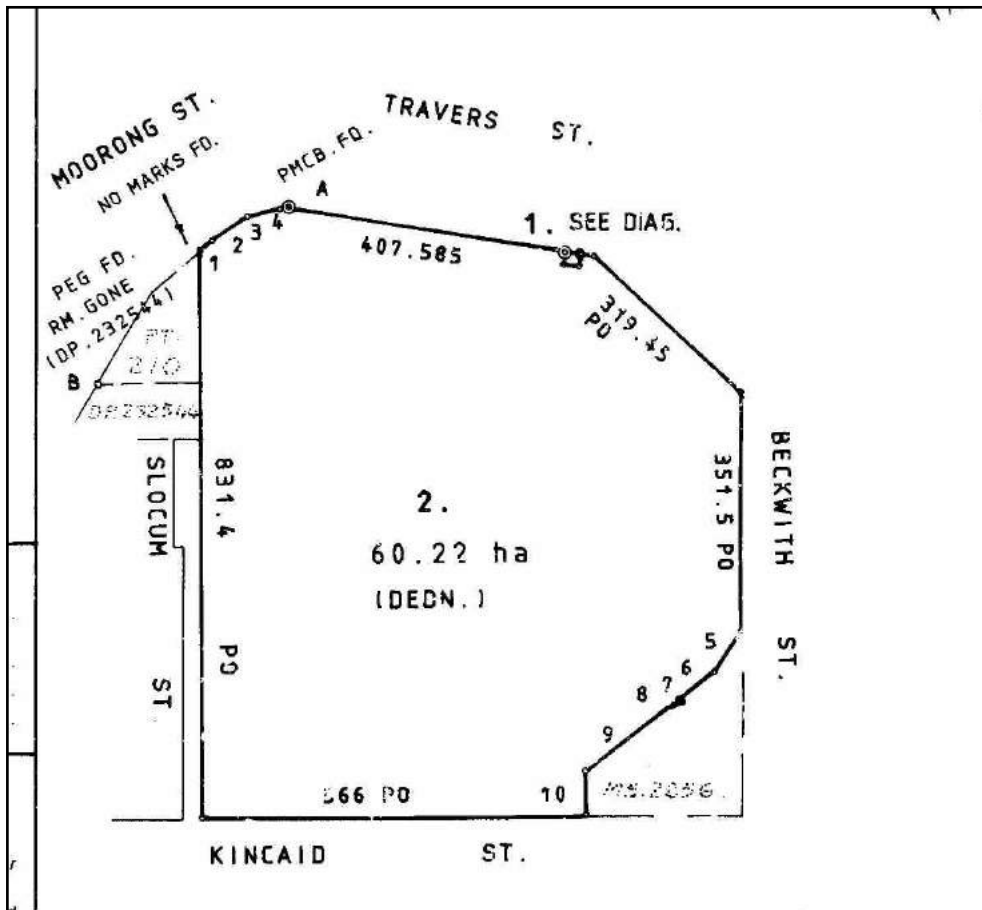


Figure 3: Extract of DP840187 (Source: WWCCGIS Deposited Plans 2019)

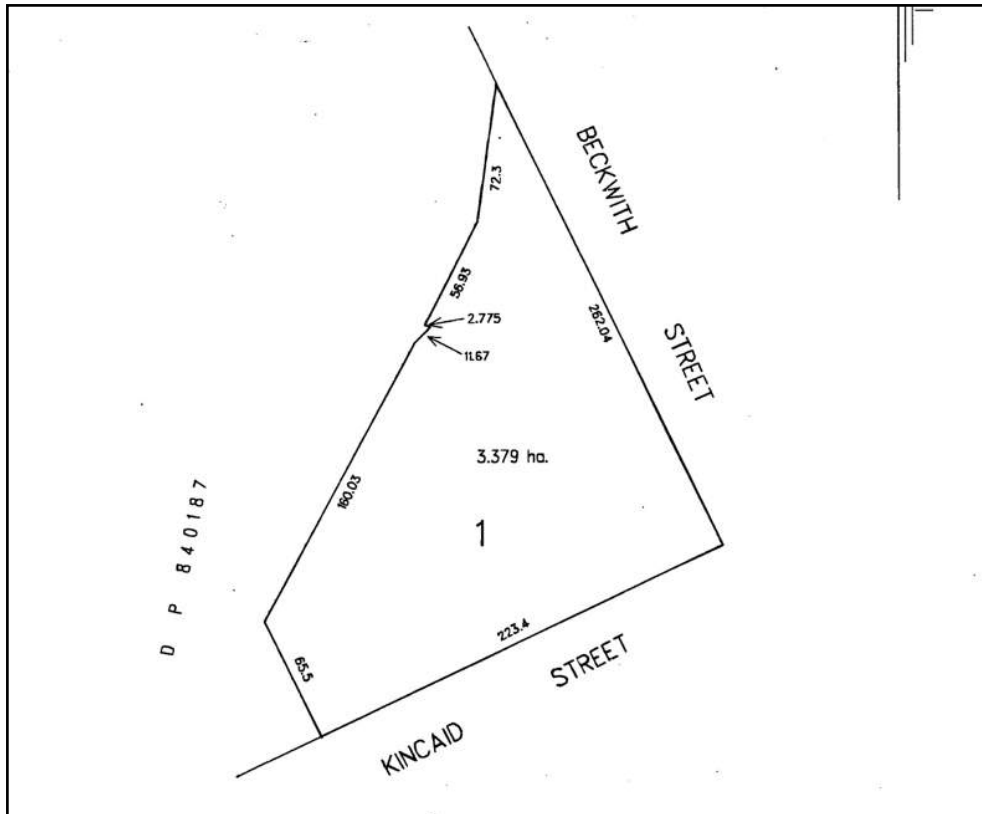


Figure 4: Extract of DP663066 (Source: WWCCGIS Deposited Plans 2019)



Figure 5: Extract of DP1141841 (Source: WWCCGIS Deposited Plans 2019)

3.2 Site Characteristics

3.2.1 Surrounding Land

The subject site is part of the Murrumbidgee Turf Club (MTC) racecourse and adjoins the Wagga Wagga Cycling Track/Cricket Ground. The MTC site is predominantly bound by existing public roads, however, the subject site immediately adjoins the Cycling Track and Cricket Ground, which includes an existing clubhouse building, tennis court and main cycling track/cricket ground.

Residential dwellings and units exist to the immediate east and south of the site. Other adjoining/adjacent land uses include the Sportsmens Club Hotel, RSL Club & Motel, Kincaid Medical & Dental Centre, as well as medical specialist rooms.

3.2.2 MTC Racecourse

The Murrumbidgee Turf Club (MTC) is the largest racing and training centre in southern NSW. In addition to conducting 25 thoroughbred race meetings each year, including the Wagga Wagga Gold Cup, the racecourse also accommodates other ancillary activities including club rooms, horse training and stabling, function rooms and various member's bars. It is a significant contributor to the local social and economic culture of the City.

The MTC historic racecourse buildings (Grandstand, Administration and other buildings) are listed as local items of environmental heritage. The subject development site is located at the opposite eastern end of the MTC land and would have negligible impact on the significance of the listed item.

The proposal will be complimentary to the ongoing sustainable operation of the MTC racecourse and will be consistent with the future desired character of the site and immediate surrounding lands.

3.2.3 Connections/Transport Network

The subject site is located within the well-connected area of Central Wagga Wagga, with primary access for the proposal to be to Beckwith Street. The local street network connects directly with surrounding arterial roads to facilitate access to and from the site, avoiding significant trafficking via other residential streets. The site also fronts public streets that have established pedestrian, cycleway and public transport networks.

3.2.4 Air Quality Monitoring Station

In 2014, an air quality monitoring station was commissioned on part of Lot 1 by the EPA. This station measures air pollutants including Total Suspended Particles (TSP), Fine particles as PM_{2.5} (particles less than 2.5 micrometres in size) and PM₁₀ (particles less than 10 micrometres in size).

A licence agreement between Wagga Wagga City Council, Crown Reserves Reserve Trust and Department of Environmental Climate Change and Water exists for the occupation of land for the construction of the monitoring station. The agreement allows unfettered and free access to and from the premises at all times, provided observation of reasonable directions and method of routes to access the premises is adhered to. There are no further restrictive requirements set out in the agreement which will affect the proposed development.

3.3 Site History

The site, which includes both Lots 1 & 2, has previously been the subject of a number of development applications including:

140 Travers Street

- DA16/0636 – Blanket DA for events at MTC
- DA14/0306 – Continued use of 2m x 4m television screen
- ADA08/0015 – Proposed advertising sign – refused
- DA07/0908 – Proposed advertising sign – refused
- DA06/0018 – Proposed music festival
- DA03/1378 – Upgrade of existing toilet facilities
- DA03/0013 – Proposed Stewards Tower (demolish and replace existing)
- CA000982 – Proposed pump shed
- DA271/97 – Alterations to gazebo structure at MTC
- DA189/94 – Storage shed for MTC
- DA55/93 – Construction of a pump house
- DA140/90 – To demolish the existing grandstand and amenities building and to construct a new grandstand and associated amenities
- BA92/89 – Cool room
- DA208/89 – To construct a 2.4 metre high security fence around the MTC's property
- BA695/87 – Alterations and additions to Turf Club
- BA595/87 - Additions
- DA72/87 – To erect a new judges box/photo finish/commentator/video box
- DA212/86 – To construct a horse stable and yard area of brick and custom orb construction
- BA246/86 – Additions to office and amenities block
- DA200/58JG – To carry out renovations to the existing main northern entrance building and to construct a new southern entrance building
- DA199/85JG – To carry out alterations and additions to the existing administration building
- BA134/78 – Aluminium shelter system/patio cover
- BA812/76 – Additions to toilet block and kitchen
- BA619/74 – Public Bar
- BA618/74 – Building
- BA617/74 – Renovations to toilet block

60 Beckwith Street

- DA06/1177 – New amenities to sports ground facility
- DA06/0530 – Proposed change rooms
- DA05/1154 – Proposed shed
- DA04/0029 – Shade structure at Wagga Cricket Ground
- BA328/82 – Additions to building

The majority of the above applications are not relevant to the proposal.

DA189/94 is in relation to the existing storage shed location on the subject development site that will be subsequently removed/relocated as a consequence of this proposal.

Historic aerial photography indicates that the race track alignment was changed after 1990. The subject development site used to form part of the race track alignment.



Figure 6: Historical Aerial of Subject Land – 2018 (Source: WWCCGIS 2019)



Figure 7: Historical Aerial of Subject Land – 2016 (Source: WWCCGIS 2019)



Figure 8: Historical Aerial of Subject Land – 2014 (Source: WWCCGIS 2019)



Figure 9: Historical Aerial of Subject Land – 2012 (Source: WWCCGIS 2019)



Figure 10: Historical Aerial of Subject Land – 1990 (Source: WWCCGIS 2019)

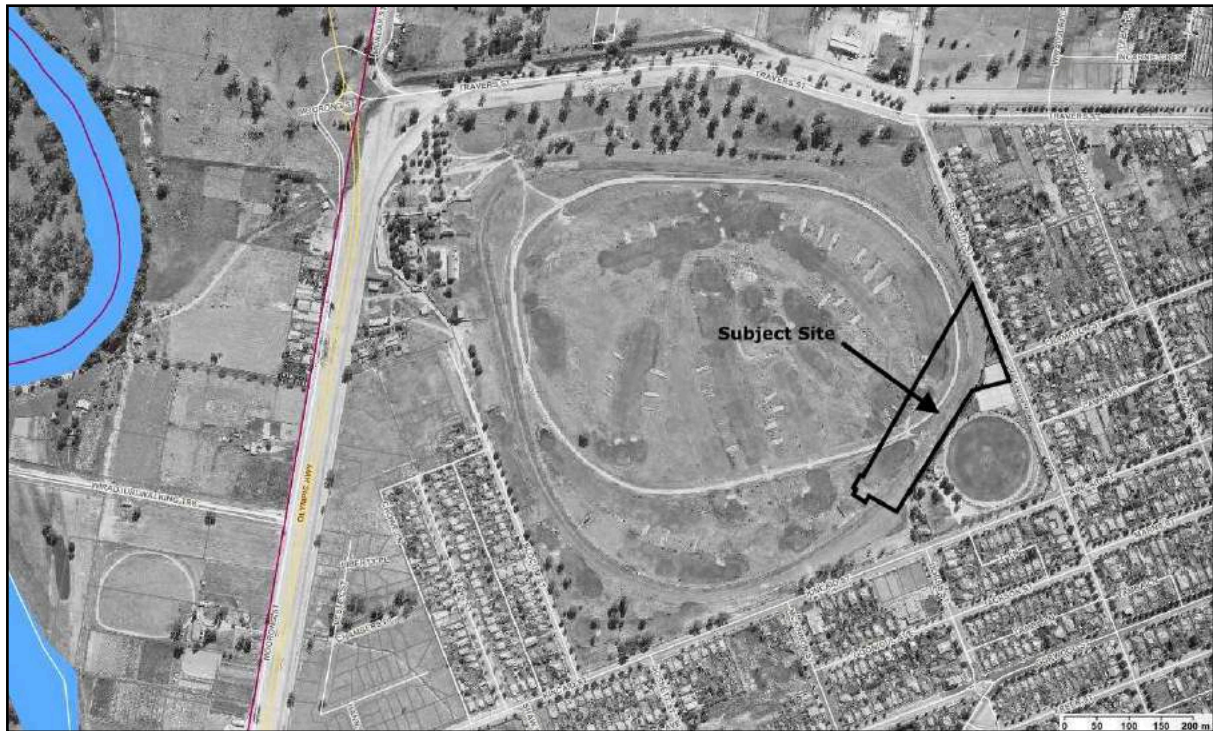


Figure 11: Historical Aerial of Subject Land – 1971 (Source: WWCCGIS 2019)

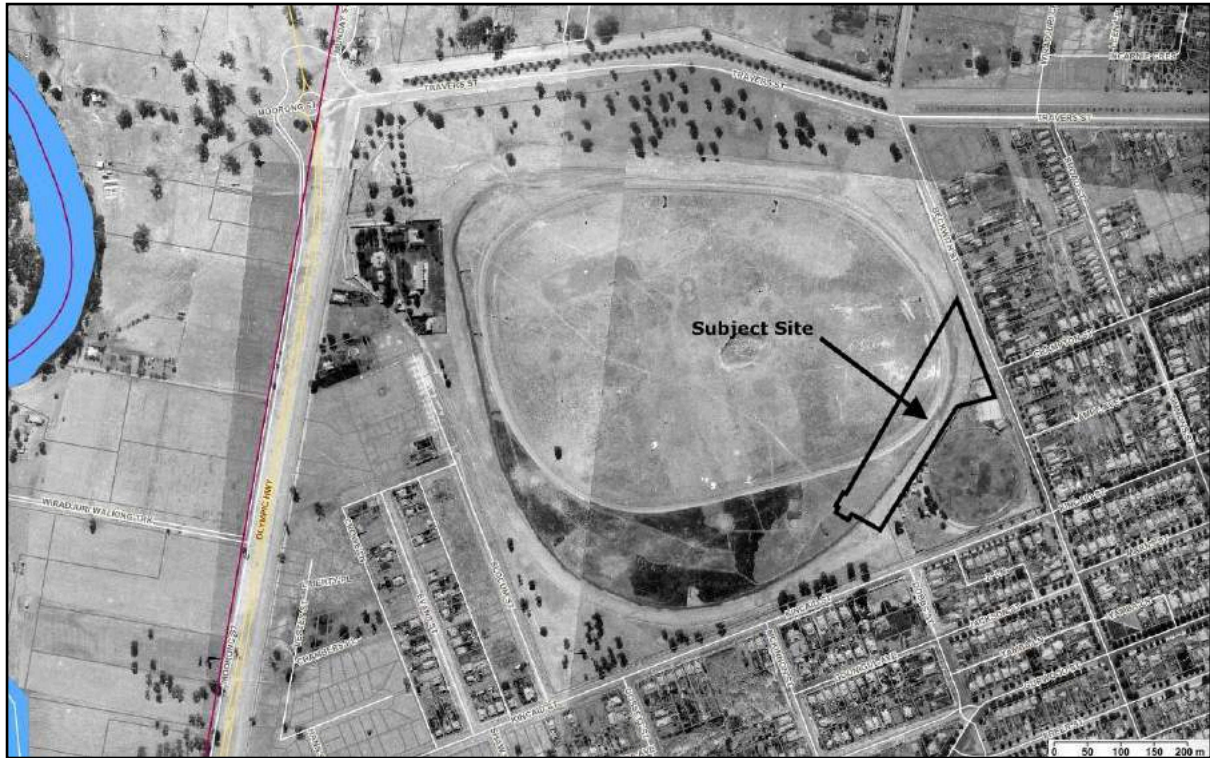


Figure 12: Historical Aerial of Subject Land – 1944 (Source: WWCCGIS 2019)

4 DEVELOPMENT PROPOSAL

4.1 Proposal Details

The development proposal is for the addition of a proposed new stable complex to the Murrumbidgee Turf Club racecourse, which will be operated in conjunction with the existing MTC racecourse facility, as described in the accompanying development plans (see attached). The racecourse is defined as a *recreation facility (major)* under applicable NSW planning legislation.

The proposal involves the construction of four stable enclosure areas to accommodate various activities including training, stabling and care for race horses in association with the operation of the racecourse. Various components are as described below:

Table 4: Proposed MTC Stables Complex - Functional Components

Component	Stable 1	Stable 2	Stable 3	Stable 4	Total
Stalls	32	32	32	29	125
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Walking Machine (10m)	1	1	1	0	3
Sand Roll Over (10m)	1	1	1	0	3
Veterinary Clinic	0	0	0	1	1

Further to the Veterinary Clinic listed above, the various components are as described below:

Table 5: Proposed MTC Stables Complex – Veterinary Clinic Functional Component

Component	Total
Procedures Room	1
Toilets/Shower	3
Laboratory	1
Office	4
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Store	1
Waiting	1
Rec	1
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Multi Purpose Room	1

Other proposed development activities involved with the establishment and operation of this complex, in addition to the above, include:

- A private specialised equine veterinary clinic facility (320m²)
- 22m x 10m external storage shed
- 22m x 5m external storage shed
- New driveway access from Beckwith Street including security gates
- Internal access road to suit large vehicles and accommodate turning paths
- 45 car parking spaces, including 1 disabled space
- 1 x heavy vehicle parking space/loading/unloading area
- 4 x internal parking areas for vehicle/horse floats
- Associated landscaping & fencing improvements
- Site preparation works including demolition of an existing shed



Figure 13: 3D image of proposed entrance from Beckwith Street (Source: Sewell Design 2019)



Figure 14: 3D image of proposed walker and sand rollover (Source: Sewell Design 2019)

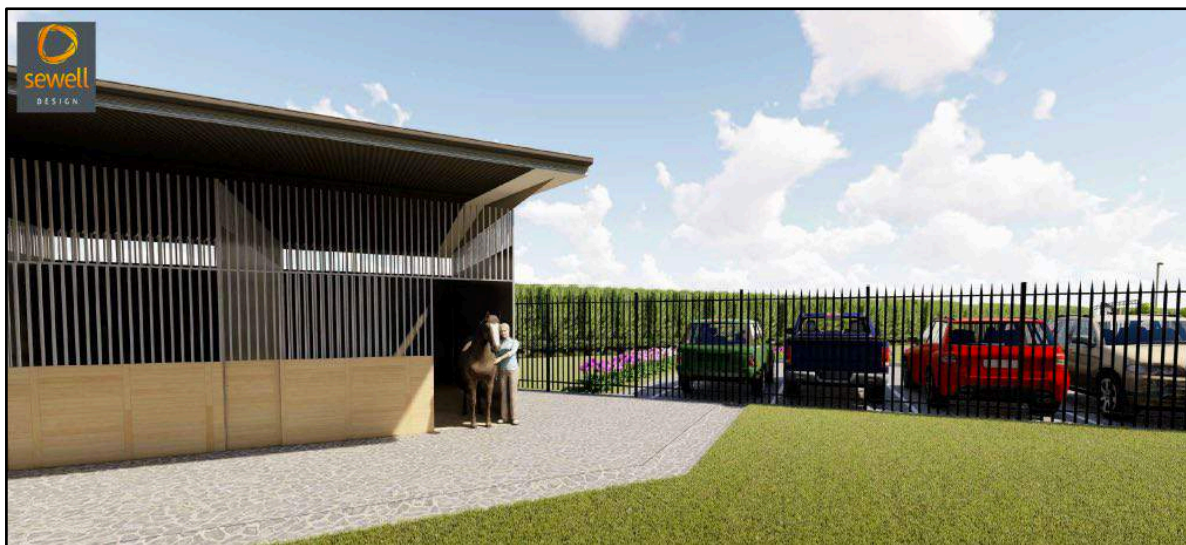


Figure 15: 3D image of proposed stables and car parking (Source: Sewell Design 2019)

Further detail is presented in the accompanying plan set, imaging and 3D video fly through.

4.2 Justification of Development

The MTC racecourse is a significant contributor to the local economy and community. In order to ensure its continuing sustainable future operation, the MTC must address the needs of thoroughbred horse accommodation and training, particularly in response to the continuing demands of animal welfare requirements, professional training facilities and increasing demands and expectations of the general racing industry.

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.

The proposed stabling and facilities are required to provide current industry-standard care and stabling for race horses on location, minimising trafficking of horses to and from site for training and events. Alternate designs and locations within the MTC land were considered, however the subject site was identified as providing a suitable area with minimal expected impact to existing operations and the general local area. The proposed siting would also avoid creating additional access to Kincaid Street or Travers Street, which carry significant traffic volumes at peak times.

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.

The MTC has completed several infrastructure projects over the last 10 years which has allowed the club to have the facilities to handle the expected additional horses. There are currently two grass surfaces and three sand tracks making the MTC the ideal training centre for any trainer.

The MTC is an industry leading training and racing facilities, located between Sydney and Melbourne. With the quality and frequency of race meetings held each year, it reflects MTC being a premier club in the district.

This project replaces a number of stabling areas (boxes) which have been lost through the sale of land and redevelopment in immediately adjoining precincts. The stall numbers available to the MTC have severely decreased by losing Murrumbidgee Lodge stables which had the potential of 86 horses trained, along with several properties in Crampton, Beckwith, Evans and Moorong Streets. There is also the impending re-allocation of the Zakynthos complex which has been earmarked for demolition in the next two years, deleting another 35 boxes. Due to the decreasing number of surrounding complexes, the proposed complex has been enhanced to assist with these issues.

A further benefit of the location of the complex on Crown Land is that it cannot be demolished in the future and redeveloped. This has been the issue with complexes that already have been demolished, making way for investors to build residential and commercial buildings.

There are currently only 155 stalls/boxes available in and around the MTC. With the amount of interest and requests received to train at the MTC, it is clear there is a high demand for the proposed complex and number of stables as proposed.

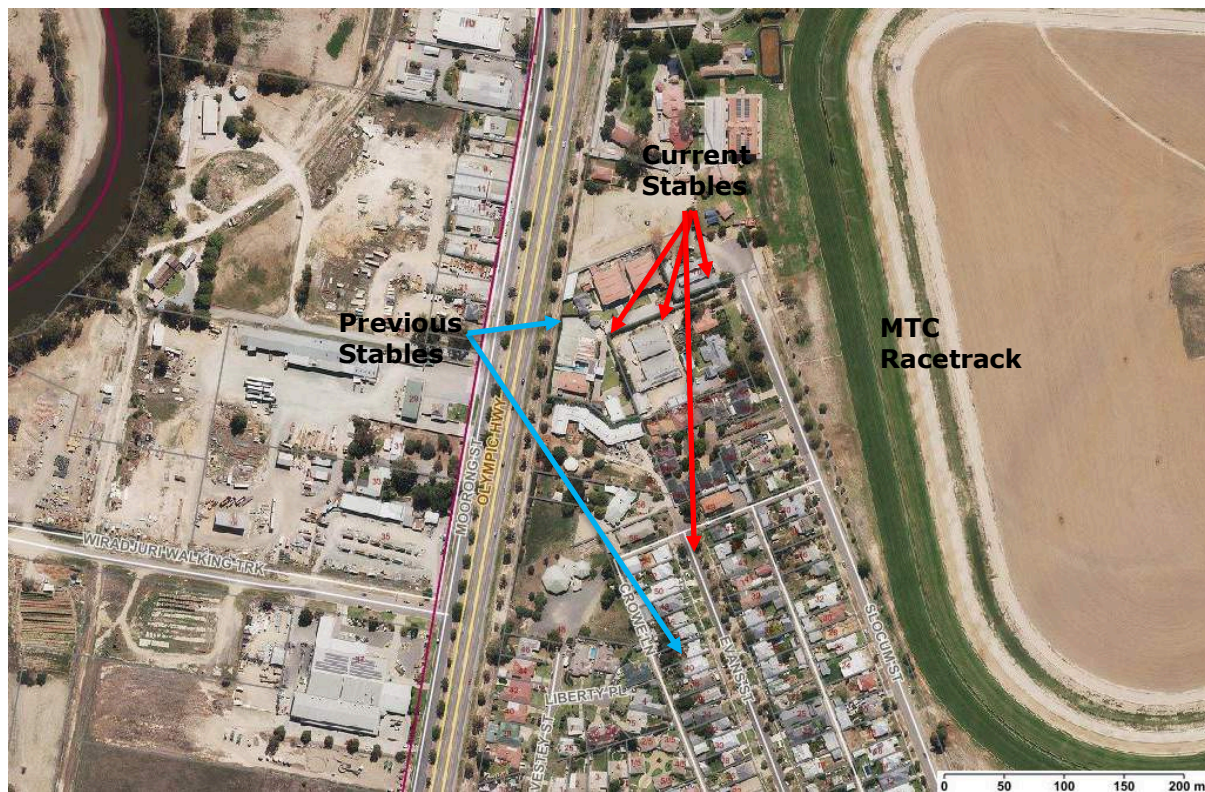


Figure 16: Location of previous and current stables (Source: WWCC GIS, SP & MTC)

Consideration of other locations

The MTC has considered other locations for the project within the existing boundaries of the MTC complex. Following considerable research and consultation with local authorities, the MTC determined the subject site as most suitable.

In July 2016, Council met with MTC representatives to inspect the site and discuss its suitability for the proposed stable complex. Further discussions were subsequently had with Senior Planning staff who advised that *"the Stable Complex Project have considerable merit"* and suggested that the club employ a consultant and necessary specialists to take the project forward.

Other siting options included:

1. Travers Street frontage:

Issues identified -

- Not able to have access from Travers Street for vehicles to enter and exit;
- Travers Street is a high traffic arterial road;
- Significant tree removal required;
- Land is low lying with stormwater ponding in this general area after heavy rainfall.

2. Centre of the existing race track:

Issues identified -

- would be considered an impediment the overall race complex operation and general aesthetics, as has been demonstrated at other major race tracks where track-centre facilities were located;
- would create visibility issues during running of races, particularly for race goers and race commentators/announcers;
- would create a safety issue in regards to trackwork, with the trackwork supervision being blind for a period while completing their lap;
- Track maintenance issues with the creation of access roads and ongoing additional track wear and tear due to continual access demands;
- Necessity for access closure and additional access scheduling procedures during race days.

4.3 Site Preparation/Demolition

The site is relatively cleared and will require minimal site preparation. Any site demolition works will be in accordance with the following Codes of Practice Standards:

- Australian Standard 2601-1991 - Demolition
- Australian Standard 1315 - Chains and slings
- Work Cover guidelines
- Work Health and Safety Act 2011
- Work Health and Safety Regulations 2011

The site works include the removal of an existing shed and other works such as site access, soil and erosion control measures, temporary fencing and site levelling works. A Soil and Water Management Plan accompanies this SEE.

4.4 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.

The MTC is currently proceeding with an approval for boundary adjustment between Part Lot 1 DP663066 and Part Lot 7314 DP1141841 and to appoint the Wagga Wagga Racecourse Trust with Corporation Manager of the Murrumbidgee Turn Club Limited as the new Land Managers.

Consolidation of the subject site is not considered necessary for this development to proceed, as no buildings are proposed to encroach boundaries.

A Right of Carriageway will be required across Lot 1 DP 663066 and Lot 7314 DP 1141841, benefitting Lot 2 DP 840187, to facilitate the proposed access to Beckwith Street.

4.5 Heritage Interpretation

The Murrumbidgee Turf Club is a listed heritage item; *176 Racecourse Group of Buildings: Entrance Building, Administration Building, Grandstand, Champagne Bar, Public Bar, Publican's Booth, Two Kiosks, Fountain*. As the Heritage Item specifically identifies the buildings as the historical value, the proposed development is considered of minimal impact to heritage. Further discussion and assessment regarding heritage is in Section 7.9 of this report.

4.6 Details of Proposal

4.6.1 Staging

The proposal will not be a staged development proposal. Phases 1, 2, 3, 4 and 5, as indicated within the development plans, will be built concurrently under a single construction contract.

Since the original conception of this project in 2016, the MTC has received significant attention and increased demand from trainers wishing to relocate to Wagga Wagga. The stable complex was originally conceived in response to non-existent availability from surrounding complexes in the vicinity of the MTC racecourse.

Racing NSW have also shown considerable interest in the project and are continually seeking updates on the proposal. This is a direct result of Federal and State Governments seeking opportunities to fund infrastructure projects through Racing NSW particularly where, in current times, there are no other "shovel-ready" projects of a similar scale to this proposal. Federal and State funding will be directed to regional areas throughout Australia, which is a great opportunity for Wagga Wagga's local economy under the current circumstances.

Based on these current economic circumstances, the proposal will not be staged and will proceed under one single construction programme.

4.6.2 Staff

The MTC currently employs 13 staff during normal daily operation of the MTC racecourse and clubhouse. This expands to 70 for race day operations, with Gold Cup race days being the exceptional peak at 265 staff for this one-off major race day event. There are 12 Board of Directors that set the strategic and business direction for the MTC, with implementation managed by a CEO.

The proposed stable complex will be available for lease by trainers who will employ their own staff and assistants to manage horse training activities. The MTC will employ additional staff to oversee the maintenance and upkeep of the overall stable complex. Current administration of the overall MTC racetrack and club facilities will continue within the existing MTC administration complex off Travers and Slocum Streets.

The proposal is expected to generate an additional 2 full time jobs (FTEs) to be employed by the MTC and up to 28 positions associated with independent trainers who will use the facility during normal (general) business operation. In addition, there will potentially be a further 3 positions created by the vet facility. A breakdown of potential FTEs is shown in the table below.

The accompanying TIA has been prepared based on potential peak usage that may occur during race days when out-of-town trainers would also use the facility. Total use is limited by available stables which is capped at 125 stalls. The table below differentiates between actual anticipated additional FTE staff in attendance at the facility during normal daily operation and staff numbers that may occur on peak race days (25 times per year).

Staff Details:

Activity Period	Role	Per Stable Area (FTEs)	Total (x4 Areas) (FTEs)
General	Trainer	1	4
	Foreman	1	4
	Strappers/Stablehands	4	16
	Trackwork Rider	1	4
	Admin/Maintenance	0.5	2
	Vet	0.5	2
	Vet Admin	0.25	1
Total	(General Operation Week)	8.25	33
Race Day (25/yr peak)	Potential Additional Trainers	3	12
	Potential Additional Strappers	3	12
Total	(Additional Race Day Peak)	6	24
Peak Total		14.25	57

Role & Responsibilities

Role	Responsibility
Trainer	All activities and occurrences within their stable complex, including direct liaison with and accountability to the MTC and Racing NSW. They are responsible for overseeing all procedures including security, emergency/incident response, animal welfare and monitoring/management of potentially offensive noise or other off-site impacts.
Foreman	Second in charge to the trainer and is the next port of call when the trainer is absent.
Strapper/Stablehand	To carry out general stabling duties including the cleaning out of soiled bedding and refreshing stalls, saddling up and washing down horses after trackwork and/or racing.
Trackwork Rider	Riding all allocated horses in trackwork each morning.
Admin/Maintenance	To oversee the maintenance and upkeep of the overall stable complex. Management and minimisation of offsite impacts.
Vet	To attend to horses as needed to ensure health and well-being in accordance with equine welfare standards and guidelines.
Vet Admin	Administration of Vet activities

The overall management practices for the facility will be the responsibility of the MTC CEO and will be established using guidelines set by Racing NSW and in accordance with racing industry standards. This also includes after hours attendance for security, emergency/incident response, monitoring/management of potential offensive noise and other offsite impacts.

The club will also enter an agreement with each trainer to ensure these practices and standards are always maintained where they are directly related to each trainer's activities.

4.6.3 Facilities

The proposed development will provide a range of facilities to cater to racing horses' requirements.

Stable Enclosure Areas

Stabling areas 1-3 will each provide two wash bays, one tack room, one feed room, two feed stores, a separate fresh bedding hopper and soiled bedding skip bin. Stabling area 4 will provide a specialist private veterinary clinic, two wash bays, one tack room, two feed stores, a separate fresh bedding hopper and soiled bedding skip bin.

Areas 1-3 will each provide an office, lunch room, 1 male toilet and 1 unisex/disabled toilet with shower. Stabling area 4 will provide a toilet connected to the veterinary clinic

facility. Within the veterinary clinic, a multi-purpose room, separate disabled toilet, female toilets with showers and male toilets with showers are provided.

Veterinary Clinic

The proposed veterinary clinic is intended to serve the needs of horses stabled within the complex and not for general public access.

Consent is sought for the veterinary building as shown on development plans accompanying this SEE.

The veterinary building will not be used for commercial practices and is solely for the purposes of attending to the health and well-being of horses stabled within the proposed complex.

The building will be used as required and will continually be available to the onsite trainers to use with the veterinarian of their choice.

A management plan will be prepared to guide the operational use of this building in accordance with adopted veterinary and equine standards and practices.

4.6.4 Hours of Operation

Given the nature of development, the stables will be in use 24 hours a day, 7 days a week.

Normal operational hours are from 4:30am to 5:00pm, whilst race days are from 11:00am to 7:00pm. Away race meetings will have trainers accessing the site from 7.30am and returning no later than 10:00pm, depending on race location. 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.

The main operational activity time thresholds occur generally as shown in the table below:

Activity	Time	Frequency
1. Trackwork	4:30am – 9:00am	Daily
2. General Administration and Maintenance	9:00am – 5:00pm	6 days/wk (Mon-Sat)
3. Race Days – General	11:00am – 7:00pm	25 times/yr (fortnightly)
4. Away Race Days	7:30am – 10:00pm	6 days/wk (Mon-Sat)

4.6.5 Operational Activity Details

Trackwork activities would include:

- Arrival of trainers and saddling of horses ready for trackwork
- Warming up horses
- Trackwork, which is completed on the race track (as occurs currently) with direct access from the stable complex
- Cooling down of horses following exercise
- Race day preparation
- Cleaning of the complex and individual horse boxes.

Home (MTC) Race Day activities generally include:

- Staff accessing the stables
- Preparation of horses (washing and grooming)
- Preparation of race day equipment (bridles, leads etc)
- Gold Cup is a one-off annual event that involves races on Thursday and Friday in May

Away Race Day activities involve:

- The same processes occur as above, with the addition of floats or a light rigid truck collecting horses and leaving the complex between 7:30am and 1:00pm, returning between 4:00pm and 10:00pm, depending on destination.
- Destinations include regional (country) race tracks, each day other than Wednesday, and metropolitan (Sydney/Melbourne) race tracks, Wednesdays and Saturdays only.
- There are no more than 2 trainers that would attend away-races, returning generally prior to 8:00pm.
- Only 1 trainer generally attends metropolitan races, returning prior to 10:00pm. If potential for a later return, the trainer will reschedule to arrive the following day. This is MTC policy.

All service vehicles will enter during general business hours, with all other vehicles to enter at the request of the tenant, abiding by the terms and conditions set by the club. The gates will be locked with the trainers having remote access for emergencies. Each trainer will be required to sign a contract stating they will abide by the management protocols that are set by the MTC.

The delivering and collecting of horses occurs between trackwork start and general business hours, except for emergencies. All service vehicles will be granted access during business hours, except for emergencies. This will be contracted to the successful trainer group to ensure compliance.

4.6.6 Traffic Generation, Car Parking and Access

Traffic and car parking generation and impact have been addressed in the accompanying Traffic Impact Assessment (TIA prepared by Peter Meredith Consulting).

The TIA considers traffic generation, car parking including adequacy of onsite parking for larger vehicles, access, travel routes for delivery/service vehicles and road network impacts (including intersections). The following conclusions are made;

- *The proposed development is likely to generate an additional 104 vehicle trips per day, with 39 trips in the AM peak period and 16 in the PM peak period. This additional traffic will not have a significant adverse impact on the surrounding road network or key intersections;*
- *The proposed development can provide 46 off-street parking spaces (including one for a semi-trailer or service vehicle and one for persons with a disability). This is sufficient to meet the expected peak demand for parking at the site; and*
- *Access, parking and internal manoeuvring areas all meet the minimum requirements of AS2890.*

The TIA recommends the provision of access and parking in accordance with the proposed development plans.

Vehicles with horse float and also light rigid vehicles will have a parking bay within each stable area enclosure, as shown on the proposed development plans (see DFT.). Manoeuvring paths are shown on the revised DA plan set (XP Sheet C5). As discussed in the TIA, rate of pick up and drop off is low and relatively infrequent. One space per stable area is sufficient for purposes of this stable complex proposal.

The singular over-size parking area (19m semi-trailer) in the overall complex will only be used for dropping off and collecting of horses, with a maximum of 6 deliveries per year spread throughout the duration of the racing season. This single space is sufficient for the needs of the proposed complex.

4.7 Safety and Security

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

The proposed gates will be electronic and open during the normal hours of trackwork and site operation from 4.30am to 5.00pm to allow staff members access. This will be detailed within each Trainers contract and within the Complex's Management Plan. Outside of the allocated time, access will be controlled remotely via a pin pad or remote control. The gates will be aesthetically designed to align with the local character and heritage aspects.

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.

4.8 Streetscape/Urban Design/Landscaping

4.8.1 Beckwith Street

The land east of Beckwith Street is an established residential area with large mature trees spaced intermittently along the length on both sides of the road. It is proposed to embellish and landscape treat the Beckwith Street frontage to minimise the impact of the development on the adjacent residential areas. The proposed planting will create a visual and acoustic screening barrier to adjacent land and increase the visual amenity of the existing Beckwith Street streetscape.



Figure 17: Beckwith Street proposed frontage treatment – 3D image (Source: Sewell Design 2019)

5 INFRASTRUCTURE

5.1 Provisions of Essential Services

All essential services, including water, electricity, gas, telecommunication, sewer, drainage, road network and garbage services, are available in the general area and connections will be provided in accordance with all relevant Council and Service Provider Guidelines.

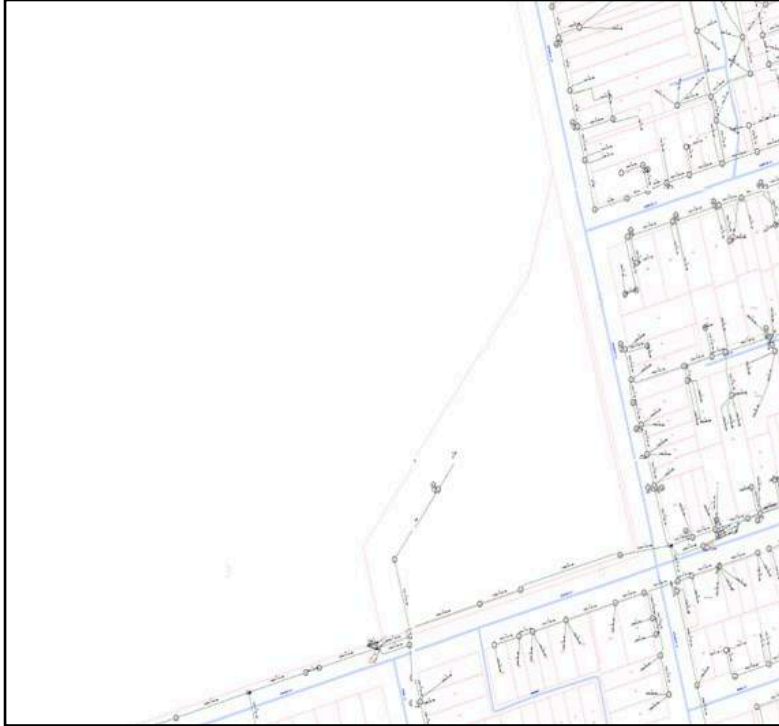


Figure 18: NBN Assets Map (Source: DBYD 2019)



Figure 19: Riverina Water County Council Assets Map (Source: DBYD 2019)

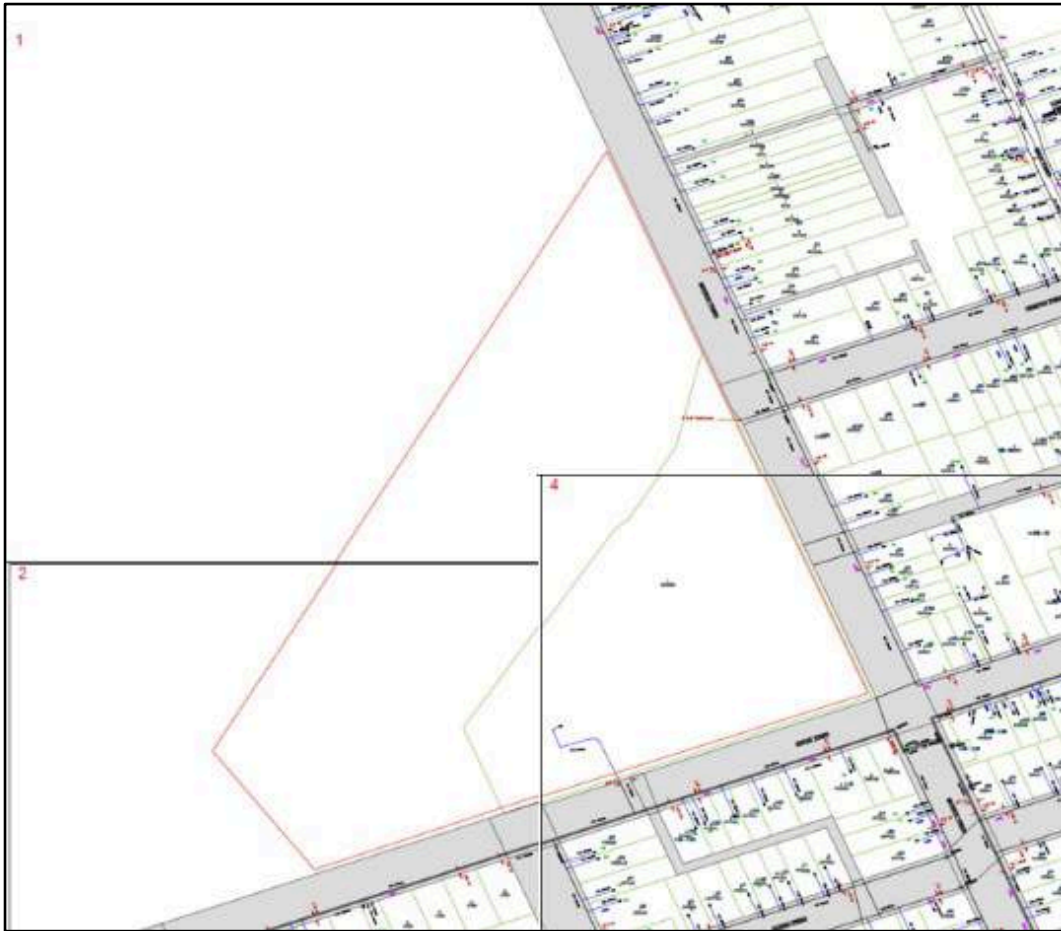


Figure 20: APA Assets Map (Source: DBYD 2019)

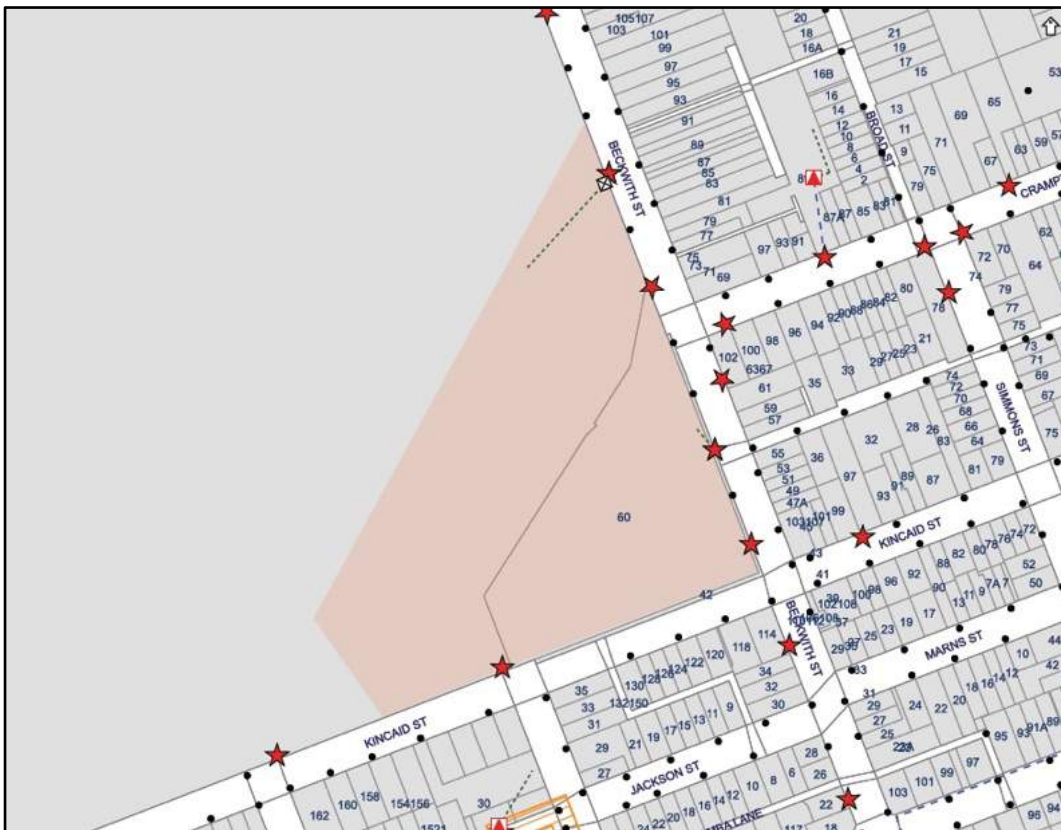


Figure 21: Essential Energy Assets Map (Source: DBYD 2019)

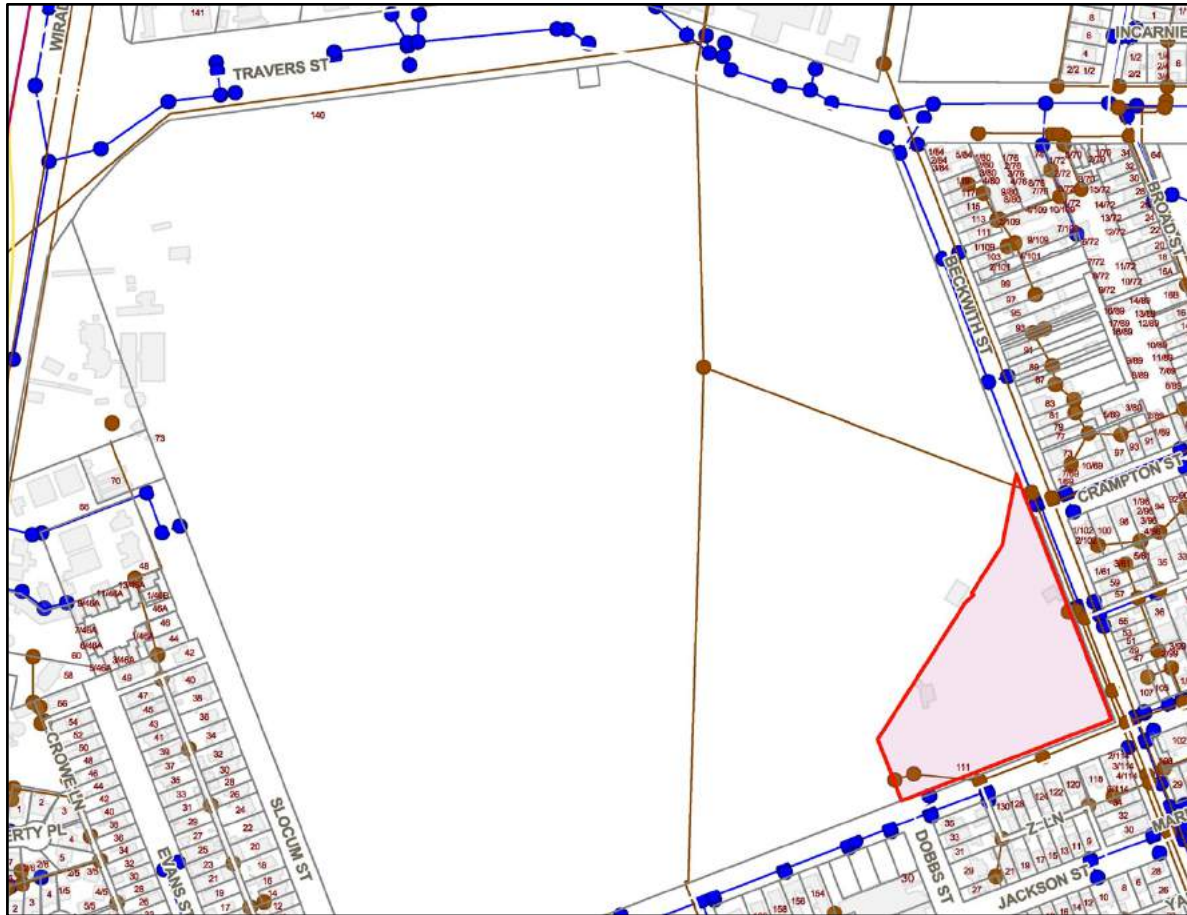


Figure 22: WWCC Sewer and Stormwater Assets Map (Source: WWCCGIS 2019)

5.2 Waste Management

Waste generated on site will be managed in accordance with the accompanying Waste Management Plan (WMP) prepared by NGH Environmental. The WMP outlines industry best practices and addresses processes for the management of waste generated by construction, horse bedding and manure, garden, operational, clinical and water wastes. No contaminated or hazardous wastes are expected as a result of the development.

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.

6 PLANNING POLICIES AND GUIDELINES

6.1 State Environmental Planning Policies

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).

In addition, certain other Acts and regulations are applicable to the development as referred to in the following table.

6.1.1 Integrated Development

The proposed development is not integrated development.

The table below assesses the site and proposal against the provisions of s4.46 of the EP&A Act 1979.

Table 6: Applicable Integrated Development
Consideration of S4.46 of the EP&A Act 1979

Act	Approval	Comment
<i>Coal Mine Subsidence Compensation Act 2017</i>	<i>Approval to alter or erect improvements, or to subdivide land, within a mine subsidence district.</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Act.
<i>Fisheries Management Act 1994</i>	<i>Aquaculture permit</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Section.
	<i>Permit to carry out dredging or reclamation work</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Section.
	<i>Permit to cut, remove, damage or destroy marine vegetation on public water land or an aquaculture lease, or on the foreshore of an such land or lease</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Section.
	<i>Permit to:</i> <i>(a) set a net, netting or other material, or</i> <i>(b) construct or alter a dam, floodgate, causeway or weir, or</i> <i>(c) otherwise create an obstruction, across or within a bay, inlet, river or creek, or across or around a flat</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Section.
<i>Heritage Act 1977</i>	<i>Approval in respect of the doing or carrying out of an act, matter or thing referred to in s 57 (1)</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Act.
<i>Mining Act 1992</i>	<i>Grant of mining lease</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Act.
<i>National Parks and Wildlife Act 1974</i>	<i>Grant of aboriginal heritage impact permit</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Act.
<i>Petroleum (Onshore) Act 1991</i>	<i>Grant of production lease</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Act.
<i>Protections of the Environment Operations Act 1997</i>	<i>Environment protection licence to authorise carrying out of scheduled development work at any premises.</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Section.
	<i>Environment protection licence to authorise carrying out of scheduled activities at any premises (excluding any activity described as a "waste activity" but including any activity described as a "waste facility").</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Section.
	<i>Environment protection licences to control carrying out of non-scheduled activities for the purposes of regulating water pollution resulting from the activity.</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Section.
<i>Roads Act 1993</i>	<i>Consent to:</i> <i>(a) erect a structure or carry out a work in, on or over a public road, or</i> <i>(b) dig up or disturb the surface of a public road, or</i>	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Section. The proposal will have access to a Council controlled public road.

	(c) remove or interfere with a structure, work or tree on a public road, or (d) pump water into a public road from any land adjoining the road, or (e) connect a road (whether public or private) to a classified road	
Rural Fires Act 1997	Authorisation under section 100b in respect of bush fire safety of subdivision of land that could lawfully be used for residential or rural residential purposes or development of land for special fire protection purposes	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Act.
Water Management Act 2000	Water use approval, water management work approval or activity approval under part 3 of chapter 3	Not Applicable, proposal does not meet criteria for consideration as integrated development under this Act.

6.1.2 Biodiversity Conservation Act 2016 No.63

The subject site is zoned RE1 and RE2 and therefore is excluded from the Biocertified Area of the WWLEP 2010. Thus, the site is subject to the Biodiversity Conservation Act 2016. The proposal is measured against Part 7 Division 1 Section 7.2 as below.

With the below assessment, the proposal is not likely to significantly affect threatened species.

Development or activity is likely to significantly affect threatened species if:

- *it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in Section 7.3*

No, applying the biodiversity test in Section 7.3 concludes that the proposed development will not likely to significantly affect threatened species or ecological communities, or their habitats.

- *the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values*

No, the development does not exceed the Biodiversity Offset Scheme Entry Threshold as per the below figure.

- *it is carried out in a declared area of outstanding biodiversity value*

No, the development is not within a declared area of outstanding biodiversity value as per the below map.

Biodiversity Values Map and Threshold Report		
Results Summary		
Date of Calculation	19/06/2020 11:21 AM	BDAR Required*
Total Digitised Area	3.04 ha	
Minimum Lot Size Method	Lot size	
Minimum Lot Size	3.35 ha	
Area Clearing Threshold	0.5 ha	
Area clearing trigger Area of native vegetation cleared	Unknown #	Unknown #
Biodiversity values map trigger Impact on biodiversity values map(not including values added within the last 90 days)?	no	no
Date of the 90 day Expiry	N/A	

Figure 23: Biodiversity Values Threshold Result Summary (Source: DP&E 2020)

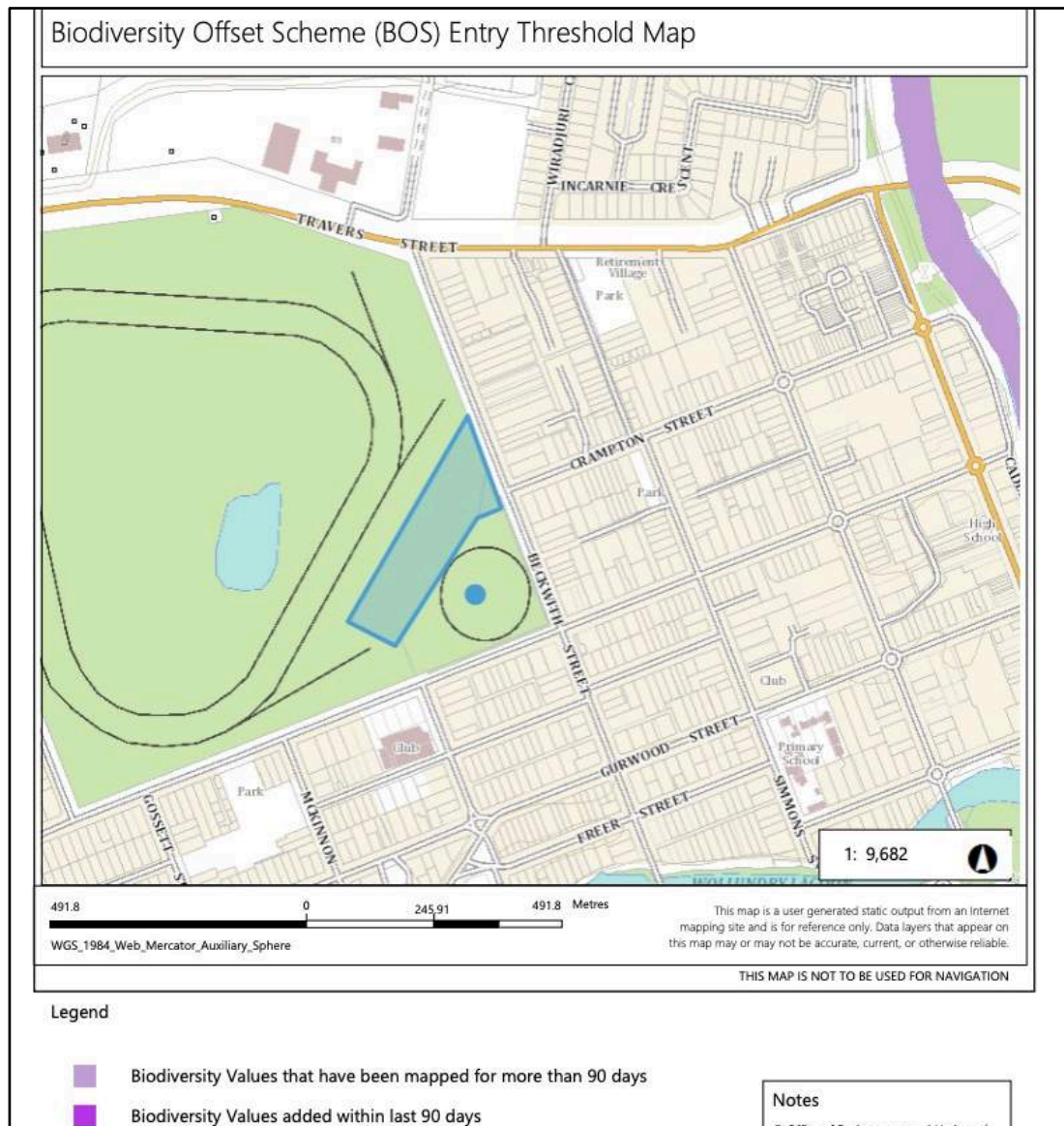


Figure 24: Biodiversity Values Map (Source: DP&E 2020)

6.2 State Environmental Planning Policies

The State Planning Controls applicable to this site, as listed by the NSW Planning Portal, are outlined in the table below (*note, only policies that are relevant to the proposal are listed to assist in the assessment of the proposal*).

Table 7: SEPPs Applying to the Land and Proposal

SEPP Applicability to the Proposal	
SEPP	Comments
SEPP1 – Development Standards	Not Applicable.
SEPP21 – Caravan Parks	Not Applicable.
SEPP33 – Hazardous and Offensive Development	Not Applicable.
SEPP36 – Manufactured Home Estates	Not Applicable.
SEPP44 – Koala Habitat Protection	Not Applicable.
SEPP50 – Canal Estate Development	Not Applicable.
SEPP55 – Remediation of Land	Consideration of site contamination is a statutory requirement when considering development applications. The subject site is not classified as potentially contaminated land by Council's records and there is no known knowledge of any activities listed in Table 1. Further details are discussed in Section 7.10.
SEPP64 – Advertising and Signage	Not Applicable.
SEPP65 – Design Quality of Residential Apartment Development	Not Applicable.
SEPP (Affordable Rental Housing) 2009	Not Applicable.
SEPP (Building Sustainability Index: BASIX) 2004	Not Applicable.
SEPP (Concurrences) 2018	Not Applicable.
SEPP (Educational Establishments and Child Care Facilities) 2017	Not Applicable.
SEPP (Exempt and Complying Development Codes) 2008	Not Applicable.
SEPP (Housing for Seniors or People with a Disability) 2004	Not Applicable.
SEPP (Infrastructure) 2007	Not Applicable.
SEPP (Mining, Petroleum Production and Extractive Industries) 2007	Not Applicable.
SEPP (Miscellaneous Consent Provisions) 2007	Not Applicable.
SEPP (Primary Production and Rural Development) 2019	Not Applicable.
SEPP (State and Regional Development) 2011	Not Applicable. Application is not over \$30 million, is not Council related development or being carried out by or on behalf of the Crown. Local development only.
SEPP (Vegetation in Non-Rural Areas) 2017	Not Applicable.

6.3 Wagga Wagga Local Environmental Plan (LEP) 2010

The site is subject to the provisions of Wagga Wagga Local Environmental Plan 2010 (the LEP).

The particular aims of the LEP are:

- (a) to optimise the management and use of resources and ensure that choices and opportunities in relation to those resources remain for future generations,
- (b) to promote development that is consistent with the principles of ecologically sustainable development and the management of climate change,
- (c) to promote the sustainability of the natural attributes of Wagga Wagga, avoid or minimise impacts on environmental values and protect environmentally sensitive areas,
- (d) to co-ordinate development with the provision of public infrastructure and services.

The proposal satisfies these particular aims by providing a sustainable development on serviced and appropriately zoned land. The development will avoid any detrimental impacts on environmentally sensitive areas and localities, and provide a facility for the social and economic benefit of the local and wider community.

Discussion on applicable sections of the LEP is provided below.

6.3.1 Land Use Zoning

The subject land is zoned part RE1 Public Recreation and part RE2 Private Recreation under the provisions of the LEP, as shown in the figure below.

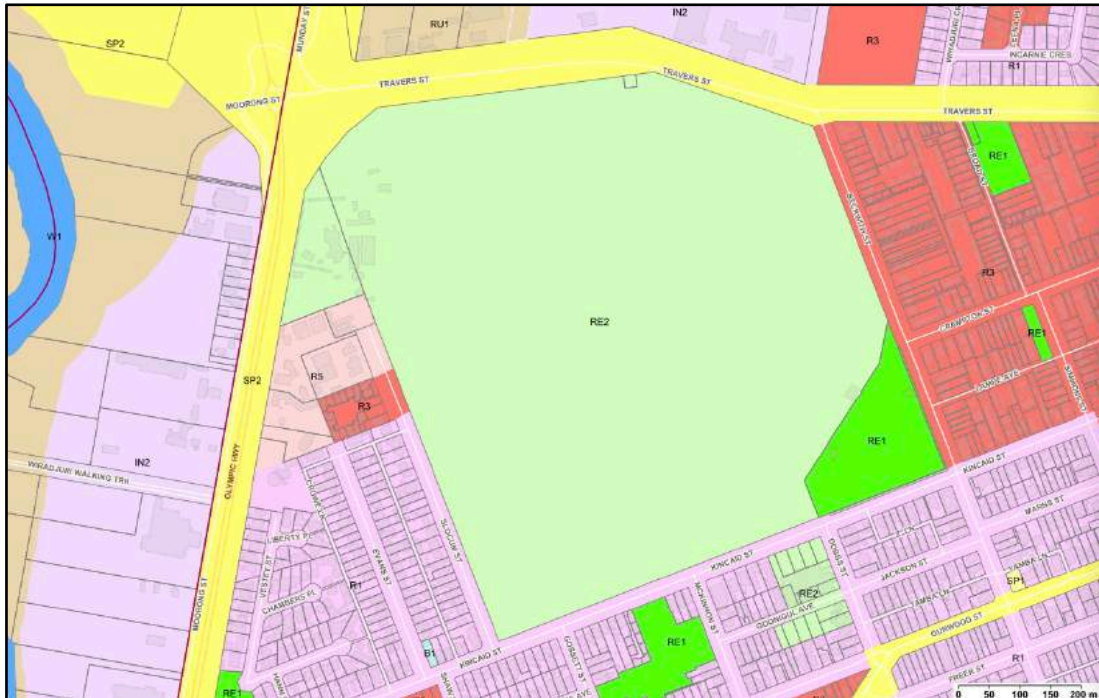


Figure 25: Land Zoning Map (Source: WWCCGIS 2019)

The zoning boundaries relate to the existing cadastral lot boundaries, which do not correlate with the current fencing and usage of Lots 1 & 2. The majority of site works and buildings will be established over Lot 2 (RE2), with access driveway and landscaping across Lot 1 (RE1).

Lot 1 (RE1) is also identified on Council records as “Community Land”. An agreement will be required with Council for ongoing access and occupation arrangements over that parcel of land.

Land Use Table extract for the RE1 zone is provided below:

Permitted without consent
<i>Environmental facilities; Environmental protection works; Roads</i>
Permitted with consent
<i>Aquaculture; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Charter and tourism boating facilities; Centre-based child care facilities; Community facilities; Depots; Entertainment facilities; Flood mitigation works; Function centres; Helipads; Information and education facilities; Jetties; Kiosks; Markets; Marinas; Mooring pens; Moorings; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Respite day care centres; Sewerage systems; Signage; Water recreation structures; Water supply systems; Wharf or boating facilities</i>
Prohibited
<i>Any development not specified in item 2 or 3</i>

Land Use Table extract for the RE2 zone is provided below:

Permitted without consent
<i>Roads</i>
Permitted with consent
<i>Aquaculture; Boat launching ramps; Boat sheds; Camping grounds; Car parks; Caravan parks; Charter and tourism boating facilities; Centre-based child care facilities; Community facilities; Environmental facilities; Environmental protection works; Flood mitigation works; Function centres; Helipads; Hotel or motel accommodation; Information and education facilities; Jetties; Kiosks; Landscaping material supplies; Markets; Marinas; Mooring pens; Moorings; Recreation areas; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Respite day care centres;</i>

Restaurants or cafes; Sewerage systems; Signage; Water recreation structures; Water supply systems; Wharf or boating facilities
Prohibited
Any development not specified in item 2 or 3

6.3.2 Permissibility

The proposal is an additional ancillary activity in conjunction with the existing MTC racecourse, which is the dominant purpose of the existing land use activity on the subject land.

The racecourse is defined under the LEP as:

recreation facility (major) means a building or place used for large-scale sporting or recreation activities that are attended by large numbers of people whether regularly or periodically, and includes theme parks, sports stadiums, showgrounds, racecourses and motor racing tracks.

The proposed stable complex will be an ancillary use to the primary, or dominant, use of the land as a racecourse. It will serve the needs of the racecourse to meet current demands and expectations of the thoroughbred horse racing industry and ensure ongoing sustainability of MTC operations.

The Zone Objectives, as they relate to permissibility of the proposal are considered in the table below:

Table 8: Relevant LEP 2010 Zone Objectives

LEP 2010 – Zone RE1 Public Recreation	
Objective	Comments
To enable land to be used for public open space or recreational purposes.	Not applicable. The land is not currently used for public open space purposes. There are no current or future plans to use the land for public open space. The existing use of the land for MTC racecourse purposes will continue.
To provide a range of recreational settings and activities and compatible land uses.	Consistent. The proposal is an addition to an existing private recreation activity and will provide a compatible ancillary use.
To protect and enhance the natural environment for recreational purposes.	Consistent. The proposal does not involve any major change or impact to the natural environment. The proposal works will be undertaken on land and within the scope of best management practices to ensure the protection and enhancement of the natural environment for recreation purposes.
To protect and enhance the natural environment generally and to assist in ensuring that areas of high ecological, scientific, cultural or aesthetic values are maintained or improved.	Consistent. The proposal does not detrimentally impact the natural environment. The natural environment is protected and enhanced by directing development to land other than areas of high ecological, scientific, cultural or aesthetic value.
LEP 2010 – Zone RE2 Private Recreation	
Objective	Comments
To enable land to be used for private open space or recreational purposes.	Consistent. The proposal will continue to enhance and make better use of existing private open space/recreational land.
To provide a range of recreational settings and activities and compatible land uses.	Consistent. The proposal is an addition to an existing private recreation activity and will provide a compatible ancillary use.
To protect and enhance the natural environment for recreational purposes.	Consistent. The proposal does not involve any major change or impact to the natural environment. The proposal works will be undertaken on land and within the scope of best management practices to ensure the protection and enhancement of the natural environment for recreation purposes.

6.3.3 Consideration of Relevant LEP Clauses

In addition to LEP2010 clauses contained in Part 1 (Aims) and Part 2 (Permissibility) discussed above, the following other clauses have been considered in relation to this development proposal:

Part 3 Exempt & Complying Development

3.1 – 3.3 Various provisions - Noted

Part 4 Principal Development Standards

4.1 – 4.6 Various provisions - Not applicable

Part 5 Miscellaneous provisions

5.1 Relevant acquisition authority - Relevant – Not applicable

5.2 Classification ... of public land - Relevant – Not applicable

5.3 Development near zone boundaries - Relevant – Not applicable

5.4 – 5.9 Various provisions - Not applicable

5.10 Heritage conservation - Applicable – see section 6.3.4

5.11 – 5.19 Various provisions - Not applicable

Part 6 – Urban release areas

6.1 – 6.5 Various provisions - Not applicable

Part 7 – Additional Local Provisions

7.1 Restrictions ...North WW - Not applicable

7.1A Earthworks - Relevant - Noted

7.2 Flood planning - Not applicable

7.3 Biodiversity - Applicable – see section 6.1.2, 7.9

7.4 – 7.5 Various provisions - Not applicable

7.6 Groundwater Vulnerability - Relevant – Not applicable

Where indicated as applicable, the relevant clause subject matter is discussed and considered in further detail in other identified sections of this SEE.

6.3.4 Heritage Conservation – LEP Clause 5.10

The proposed development involves the erection of a building on land on which a heritage item is located (LEP Clause 5.10(2)(e)(i)) and, therefore, development consent is required, subject to Council consideration.

The objectives of this Clause are:

- (a) to conserve the environmental heritage of Wagga Wagga,
- (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,
- (c) to conserve archaeological sites,
- (d) to conserve Aboriginal objects and Aboriginal places of heritage significance.

The historic MTC buildings are listed as a local heritage item; *176 Racecourse Group of Buildings: Entrance Building, Administration Building, Grandstand, Champagne Bar, Public Bar, Publican's Booth, Two Kiosks, Fountain.*

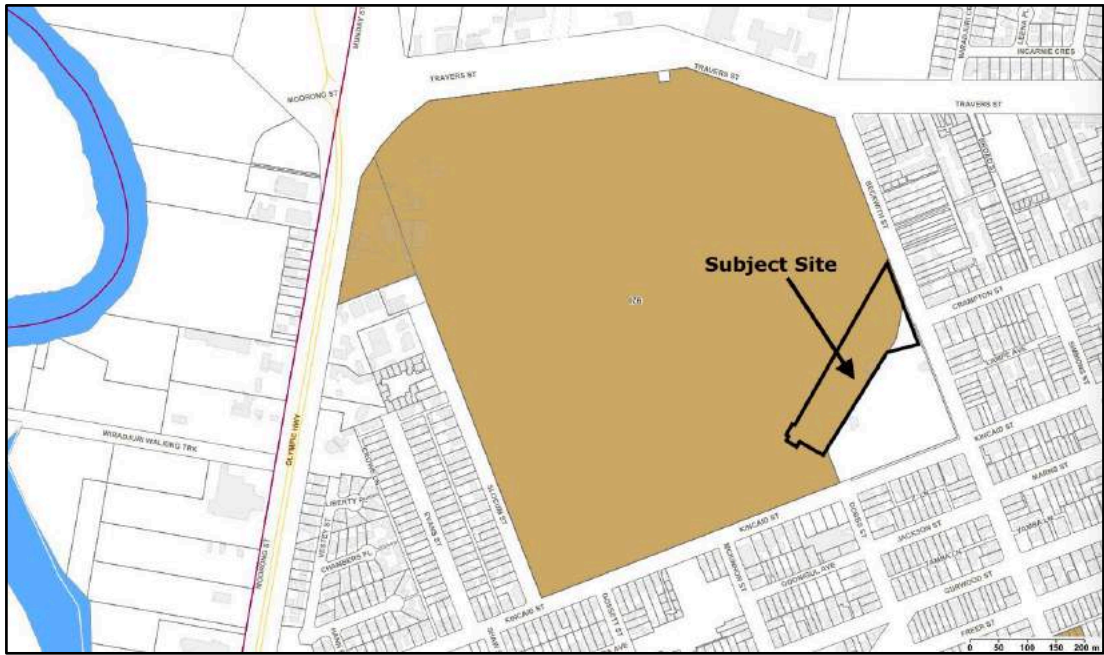


Figure 26: Heritage Items Map (Source: WWCCGIS 2019)

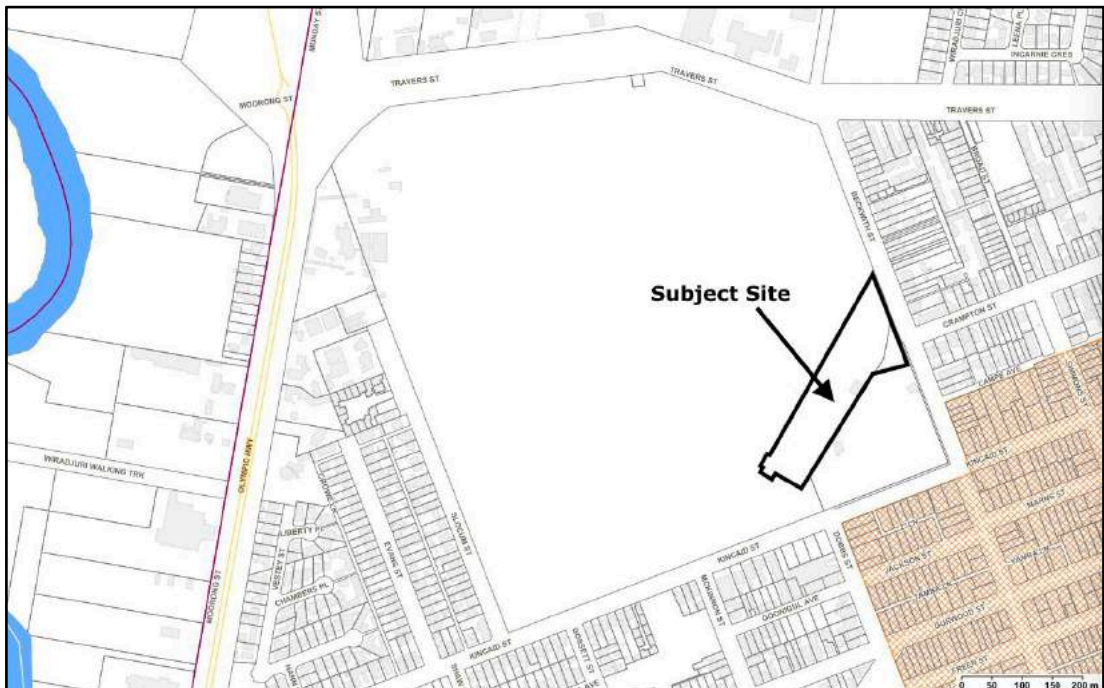


Figure 27: Conservation Area Map (Source: WWCCGIS 2019)

The proposal development is located a significant distance from the identified historic MTC buildings and any potential impact would be considered negligible in relation to the conservation of the site's heritage significance.

However, as the development is considered an extension of the MTC operations, it is intended to acknowledge the site's heritage value through the inclusion of aesthetic embellishments connected to, or reflective of, the historical aspects of the MTC. An example is provided in the image below.



Figure 28: Example of site embellishment (Source: Sewell Design 2019)



Figure 29: AHIMS Search Extract (Source: OEH 2019)

An AHIMS search extract is attached which confirms that within 200m of the site there are no aboriginal sites recorded or declared places.

In accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW2010)*, generic due diligence process, the following information is provided:

Will the activity disturb the ground surface or any culturally modified trees?

- Yes, the development proposed will disturb the ground surface, however will have no impact on any known culturally modified trees.

Are there any:

a) relevant confirmed site records or other associated landscape feature information on AHIMS?

- No (see AHIMS search as discussed above).

b) any other sources of information of which a person is already aware?

- No, there are no other known sources of information as determined via Council records and information available to the applicant.

c) landscape features that are likely to indicate presence of Aboriginal objects?

- There are no significant landscape features on site that may indicate the potential presence of Aboriginal objects, however it is noted the Murrumbidgee River is in reasonable proximity to site.

It is considered that all due diligence requirements have been fulfilled. An Aboriginal Heritage Impact Permit (AHIP) application is considered to be unnecessary. The development will proceed with caution. If any Aboriginal objects are found, work will be stopped and relevant authorities notified. If human remains are found, work will be stopped, the site will be secured and Police and other relevant authorities notified accordingly.

6.4 Wagga Wagga Development Control Plan 2010 (DCP)

Sections 2, 3, 5 and 12 of the Wagga Wagga Development Control Plan (DCP) 2010 are relevant to the proposed development and are considered in the Table below.

Table 9: Relevant DCP 2010 Controls

Section 2: Controls That Apply to All Development		
Clause	Objective/Control	Comments
2.1 Vehicle Access and Movements	C1: Access should be from an alternative secondary frontage or other non-arterial road where possible.	Satisfied. Access is proposed to Beckwith Street, rather than alternative Kincaid Street.
	C2: A Traffic Impact Study may be required where adverse local traffic impacts may result from the development. The traffic impact study is to include the suitability of the proposal in terms of the design and location of the proposed access, and the likely nature, volume or frequency of traffic to be generated by the development.	Satisfied. See accompanying Traffic Impact Assessment prepared for the development.
	C3: Vehicles are to enter and leave in a forward direction unless it can be demonstrated that site conditions prevent it.	Satisfied. See accompanying turning path plan demonstrating suitable site access and egress.
	C4: Provide adequate areas for loading and unloading of goods on site. The loading space and facilities are to be appropriate to the scale of development.	Satisfied. The access road allows for loading and unloading of goods and horses, with an additional large parking space allotted for semi-trailers.
	C5: Access driveways are to be located in accordance with the relevant Australian Standard at the time of lodgement of an application.	Satisfied, as confirmed in the accompanying Traffic Impact Assessment.
	C6: Ensure adequate sight lines for proposed driveways.	Satisfied.
2.2 Off-street parking	Controls – parking rates C1: Parking is to be provided in accordance with the table below. For uses not listed, similar land uses should be used as a guide in assessing car parking requirements.	Satisfied, see accompanying Traffic Impact Assessment for further detail.

	<i>C2: The design and layout of parking is to be in accordance with the relevant Australian Standard at the time of lodgement of an application.</i>	Satisfied, see accompanying Traffic Impact Assessment for further detail.
	<i>C3: Parking spaces are to be provided for disabled persons. Accessible parking spaces to comply with the relevant Australian Standard at the time of lodgement of an application.</i>	Satisfied, see accompanying Traffic Impact Assessment for further detail.
	<i>C4 – C7:</i>	Not applicable.
	<i>C8: A traffic and parking study may be required for certain proposals, including but not limited to proposals for schools and other education uses including child care centres, business parks, hospitals, cinemas and gyms.</i>	Satisfied. See accompanying Traffic Impact Assessment prepared for the development.
	<i>C9: Provide trees within the parking area at a rate of 1 tree per 5 spaces in a row. Each tree to have a minimum mature spread of 5m and to be located in a planting bed with minimum width of 1.5m (between back of kerbs) and minimum area of 3.5m².</i>	Satisfied. Adequate provision of trees has been indicated on the proposed landscaping plan, with a greater number of trees planted that required by this provision.
	<i>C10: Planting beds located within a car park are to have a subsoil drainage system connected into the stormwater system of the site.</i>	Satisfied. The proposed landscaping beds are indicated on the landscaping plan and will have a suitable subsoil drainage system install and connected to the stormwater system.
	<i>C11: To ensure sightlines are maintained for drivers and pedestrians, trees used within or adjacent to car parking areas shall have a minimum clear trunk height of 2.5m, with shrubs and ground covers not to exceed 500mm in height.</i>	Satisfied. Landscaping is designed to ensure sightlines for drivers.
2.3 Landscaping	<i>Landscape design C1: A landscape plan is required for applications for: Commercial and Industrial developments Residential development (other than dwelling houses).</i>	Satisfied. See accompanying Landscape Plan.
	<i>C2: Natural features at the site, such as trees, rock outcrops, cliffs, ledges and indigenous species and vegetation communities are to be retained and incorporated into the design of the development.</i>	Not applicable. No natural features exist on site.
	<i>C3: Use native and indigenous plants, especially low water consumption plants in preference to exotic species.</i>	Satisfied. A mix of species has been selected to achieve intent of the clause.
	<i>C4: Trees should be planted at the front and rear of properties to provide tree canopy.</i>	Satisfied. See Landscaping plan.
	<i>C5: Provide landscaping in the front and side setback areas, and on other parts of the site to improve the streetscape, soften the appearance of buildings and paved areas, and to provide visual screening.</i>	Satisfied. Landscaping is proposed to improve streetscape and provide screening of site.
	<i>C6: Landscaping should provide shade in summer without reducing solar access in winter. Limited use of deciduous species is acceptable where used to achieve passive solar design.</i>	Satisfied. Landscaping does not impede solar access.
2.4 Signage	<i>C1 – C76:</i>	Not applicable. No signage is proposed other than business identification signage in accordance with the CodeSEPP.

2.5 Safety and security	<i>C1: Use good site planning to clearly define public, semi-public and private areas.</i>	Satisfied. The subject site will maintain fencing and signage to identify private property.
	<i>C2: Entries are to be clearly visible and identifiable from the street, and are to give the resident/occupier a sense of personal address and shelter. For non-residential uses, administration offices or showroom are to be located at the front of the building.</i>	Satisfied. The site entry will be clearly fenced and marked.
	<i>C3: Minimise blank walls along street frontages.</i>	Satisfied. No blank walls proposed on street frontage.
	<i>C4: Avoid areas of potential concealment and 'blind' corners.</i>	Satisfied. The development has avoided areas of potential concealment and "blind corners", as far as are practical in respect of the nature and requirements of the proposal. As the development is private and fenced, screen planting is proposed to increase amenity and provide a buffer to adjoining residential dwellings. The premises will be security patrolled including video surveillance.
	<i>C5: Provide lighting to external entry areas, driveways and car parks in accordance with the relevant Australian Standards. The lighting is to be designed and sited to minimise spill and potential nuisance to adjoining properties.</i>	Satisfied. Beckwith Street is a lighted public road and internal lighting spillage is minimized through appropriate lighting design and buffer screen planting to adjoining public areas.
	<i>C6: Planting and fencing is not to reduce the safety of users or compromise areas of natural surveillance.</i>	Satisfied. The proposal involves a large site area where a significant amount of open space surrounding buildings. Landscaping is provided in appropriate areas to embellish the site. Natural surveillance will occur on site and off site through the presence of both staff and the general public.
	<i>C7: Where a site provides a pedestrian through route the access path is to be clearly defined and sign posted, appropriately lit, and have satisfactory visibility.</i>	Not applicable. No pedestrian through routes are proposed.
	<i>C8: Locate public toilets and rest areas to promote their use, and maximise public surveillance without creating visual intrusion.</i>	Not applicable. No public facilities are proposed.
2.6 Erosion and Sediment Control Principles	<i>O1 – O4:</i>	Satisfied. The development is designed and will be managed in accordance with the objectives.
2.7 Development adjoining open space	<i>C1: Private developments are not to gain access across public open space.</i>	Generally consistent. The proposal will involve access across existing RE1 land. However, the land is currently not utilized for public open space purposes and has historically been utilized by the MTC for private recreation purposes. Council is trustee for the land and has consented to the application being made.
	<i>C2: Materials are not to be stored on public land.</i>	Noted. No storage to occur.
	<i>C3: Design, massing, scale and materials to be compatible with the amenity, views and outlook from the open space area.</i>	Satisfied. Proposal design and landscaping is designed in accordance with the expected character of a racecourse and to improve local amenity and views.
	<i>C4: Landscaping is not to encroach into any public reserve.</i>	Satisfied. The proposed landscaping is confined to the development site.

Section 3 – Heritage Conservation		
Clause	Objective/Control	Comments
3.2.1 Alterations and additions to heritage items	C1 – C8:	Satisfied. The proposed additional stable compound is located to avoid impact to the existing items of heritage on site.
3.2.4 Development in the vicinity of a heritage item	C1: <i>Alterations and additions to the buildings and structure, and new development are to be designed to respect and compliment the heritage item in terms of building envelope, proportions, materials, colours, finishes and building street alignment.</i>	Satisfied. The proposed stable compound is designed appropriately and sufficiently separated from the existing historical buildings to facilitate the development without detrimentally impacting the historical significance of the site.
	C2: <i>Development in the vicinity of a heritage item is to minimise the impact on the setting of the item by:</i> a) <i>Providing an adequate area around the heritage item to allow its interpretation.</i> b) <i>Retaining original or significant landscaping associated with the heritage item.</i> c) <i>Protecting and allowing the interpretation of archaeological features associated with the heritage item.</i> d) <i>Retaining and respecting significant views to and from the heritage item.</i>	Satisfied. As above.
Section 5 – Natural Resource and Landscape Management		
Clause	Objective/Control	Comments
5.4 Environmentally sensitive land	<i>Environmentally sensitive land - biodiversity</i> C2 – C6:	Satisfied. No trees are located within the area for development.
	<i>Natural Resources Sensitivity - Groundwater</i> C12 – C13:	Relevant, however, not applicable as the proposal is not a specified development under Clause 7.6(4) of the LEP. The development does not involve onsite septic systems.
Section 12 – Specific Uses and Developments		
Clause	Objective/Control	Comments
12.3 Development on land zoned for public recreation (RE1)	C1: <i>Applications for development in public reserves and parks are to demonstrate that there is a need for the proposed use or facility.</i>	Consistent. The proposal will include the development of a small section of RE1 land that is currently fenced and used for MTC purposes. There is no public park infrastructure over this land. The works will be restricted to access and landscaping in accordance with the accompanying plans. The needs to utilize this section of RE1 land is based on the practicality to provide safe and efficient access to the development site. The need is also consistent with the historic use of the land. There will be no significant or detrimental loss of RE1 land with respect to public interest.
	C2: <i>Developments are to consider the need for public recreation areas to serve the immediately adjoining area, taking into consideration any changing demographics of the area.</i>	Satisfied. The proposal has considered the public recreation needs of the local area and any potential impact from the development. The RE1 land is not currently used for public recreation purposes and has been historically used by the MTC. There would be no detrimental usage or opportunity loss to the general public in progressing with this development.
	C3: <i>Design to complement the public recreation area and adjoining land uses.</i>	Satisfied. The proposal has been designed to be consistent with the general character of the racecourse environment and also to compliment the adjoining tennis court and cricket grounds/cycling velodrome area.

	<i>C4: All works to be consistent with any Plan of Management or public recreation strategy.</i>	Consistent. There is no specific Plan of Management across the subject RE1 land. The proposal is consistent with the overall public recreation strategy for this precinct. Council has been consulted in this regard and have provided authorization for the proposed development application over this land.
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6.4.1 DCP Variations

There are no specific DCP provision variations sought for this development proposal.

6.5 S94 & S64 Calculations

The proposal will be subject to relevant developer contributions (local infrastructure) under S7.12 of the EP&A Act 1979 and also stormwater and sewerage contributions under S64 of the Local Government Act 1993. The applicable contributions will be applied by Council at determination stage of the application in accordance with current policy.

In respect of S64 stormwater and sewer charges, consultation with Council prior to preparation of this application concluded that there was scope to review calculations based on the nature and practice of the thoroughbred horse industry, as well as site design characteristics.

6.5.1 Stormwater

Stormwater is proposed to be managed by directing all roof areas of the proposed stables and veterinary clinic, as well as hard stand areas to the existing MTC onsite dam. Overland flows during major storm events will naturally flow to the existing street system.

The revised stormwater management arrangements are shown within the Plan C3 of the development plan set.

Roof areas of stables, walking machines, sand rollover areas and veterinary clinic will be directed to the existing onsite dam via a charged stormwater line.

Surface water runoff including open walkways, landscaped areas and hardstand driveways and carparks will be directed to a detention basin via a gravity pipe system. The detention basin will have a sump and pump to then direct stormwater to the existing onsite dam. The gravity pipe system, pump and basin will be designed, at a minimum, for minor storm events, with major storm events being managed via overland flow. Overland flow in the case of large flooding events will be directed to Council's street system and will be managed to ensure it can freely drain.

On this basis, during minor storm events, stormwater runoff from the proposed development is expected to be directed to the existing onsite dam and not to Council's stormwater system.

In relation to stormwater management, floor levels and possible 'contaminated' areas will be raised above 1:100yr flood levels as required and as per standard engineering guidelines for developments of this type. This will be addressed further in the Detailed Design phase of the project.

6.5.2 Sewer

Sewer DSP charges would be applicable in relation to the proposed horse wash bay areas, veterinary clinic and staff facilities/toilet areas.

Council's initially proposed the application of equivalent car wash ET rate for the calculation of water usage of the horse wash down areas. A car wash bay uses approximately 8400 litres/day/bay.

In comparison, MTC have provided data to confirm that a horse wash bay area would use approximately 224 litres/day/bay, or 2.7% of a car wash bay usage. Council is in general agreement with the application of this amended ET rate for the horse wash bays proposal.

The Waste Management Plan (WMP-NGH) that accompanies this SEE has been revised and is to be referenced to for responses to specific matters on waste management practices and volumes (see Table 6.1 in revised WMP-NGH).

Waste water usage for horse wash bays is based on actual MTC usage figures of 28 litres per horse. Not all horses are track-worked or raced every day, with a maximum 50% of horses requiring washdown at peak usage of the proposed facility. 224 litres/day/bay is calculated on 28 litres x 8 horses per day per bay. With 8 bays proposed this generates approximately 1792 litres of waste water per day. This is in addition to other waste water generated from staff and veterinary facilities. Relevant DSP and Water Directorate guidelines apply in this instance.

The internal sewer system and pump station will be sized and designed during the Detailed Design phase to ensure capability and compliance with Council's Engineering Standards.

6.6 Additional Policies & Guidelines

The following industry specific policies and guidelines have been considered in the planning and design of the proposed stables complex.

6.6.1 Welfare Guidelines for Australian Thoroughbred Horse Racing

The proposal will implement the guidelines outlined in the subject Welfare Guidelines, in accordance with current and future operational management plans. The proposed stable complex will meet or exceed current industry standards to ensure optimum care and management of thoroughbred horses that are kept at the facility.

6.7 Other Relevant S4.15 Matters for Consideration

- *any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority.....:*

There are no known proposed instruments applicable to the development proposal.

- *any planning agreement:*

There are no known planning agreements applicable to the development proposal.

- *the suitability of the site for the development...:*

Based on the above discussion, the site is considered suitable for the development.

- *any submissions:*

Council will undertake appropriate public consultation and consider any submissions accordingly.

- *the public interest ...:*

The public interest is supported with this application as the proposal is in accordance with the publicly endorsed planning policies and guidelines to ensure compatible and sustainable development on this site and within the future desired character of the locality.

7 ENVIRONMENTAL IMPACT ASSESSMENT

7.1 Site and Locality Analysis

The Murrumbidgee Turf Club is located in the northern area of Central Wagga Wagga city, on the fringe of existing mixed density residential areas. Its location predates current planning controls, being historically a landmark of Wagga Wagga since 1849.

The MTC site contains an existing racetrack, racecourse buildings and other support outbuildings including other stable complexes. Total site coverage is in excess of 63 hectares.

The subject development site will occupy approximately 2.8 hectares of existing MTC land, including that part of Lot 1 (RE1) land required for access purposes to Beckwith Street.

The development site is proposed to be located between the existing racetrack and existing tennis court area that forms part of the Wagga Wagga Cycling Track and Cricket Ground site. The location is on land currently maintained by the MTC and is already cleared and does not contain existing native vegetation.

Land opposite the site in Beckwith Street contains mixed density residential dwellings. The Sportsmen's Club Hotel is located on the corner of Kincaid and Beckwith Street. Kincaid Street is a local arterial road and contains a mixture of residential dwellings at varying densities, as well as non-residential uses including medical specialist rooms, the RSL Club & Motel and Kincaid Medical & Dental Centre.

Streetscape characterisation of the local area is typically described as residential/compatible non-residential on eastern and southern sides of Beckwith and Kincaid Streets, and active recreation (both private and public) on the western and northern sides. Introduced street trees dominate the streetviews of both streets.



Figure 30: Photo of site (Source: SP 2018)

7.2 Community Consultation

Preliminary 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.

DA Public Notification

As a result of the public notification of the development application, several submissions were received that raised relevant questions in relation to the operation of the proposed stable complex and potential impacts to the local area. The below table summarises relevant submissions, as advised by Council, with proponent response given:

Table 10: DA Public Notification Submissions and Responses Summary

Matters raised in submissions	Response
<i>The development is not ancillary to the existing and permissible use of the site as a recreation facility (major). Rather, the use is for the purpose of an animal boarding and training establishment which is prohibited in both the RU1 and RU2 zones.</i>	The proposed stable complex is a compatible ancillary use to the primary, or dominant, use of the land as a racecourse. It will serve the needs of the racecourse to meet current demands and expectations of the thoroughbred horse racing industry and ensure ongoing sustainability of MTC operations. See s6.3.2 above in relation to permissibility.
<i>Relationship of proposed stable complex with existing operations on the site and justification for growth of MTC operations to immediately move from no on-site permanent stabling of horses to 125 new stables.</i>	See section 4.2 above for further justification for the proposal.
<i>The development is within close proximity of the Heritage Conservation Area and does not address the potential impacts on the significance of this area.</i>	Discussion is included within section 6.3.4 of the Statement of Environmental Effects (SEE). The proposal will have negligible impact on the existing conservation area due to its siting, setback and landscaping that will effectively screen the new complex from the public domain. The nature and operation of the complex is compatible with other adjoining recreation activity areas including the tennis courts, cricket ground and cycling track.

Matters raised in submissions	Response
<i>Impacts on continued operation of air monitoring station located on the site</i>	<p>The air monitoring station has been established under a lease agreement with the Crown Trustee. The lease covers only the pad site of the monitoring station, with right of access from Beckwith Street. The lease is understood to expire in March 2021.</p> <p>The proposal does not impact the continued operation of the air monitoring station. The existing fenced area and access arrangements will remain in situ. The proposed site plan does not indicate any encroachments on the pad site. The pad site will remain within an open space/landscaped area. Any buildings and activity areas of the proposed stable complex are located a minimum 8m (driveway) and over 30m (buildings) from the monitoring station pad site.</p> <p>Further details are included within section 3.2.4 of the SEE. Consultation occurred prior to the lodgement of the application. The club has received permission from the relevant authority for the proposal.</p>
<i>Increase of rodents on the site and within the area as a result of the proposed use and the potential impacts of required management practices including the use of rodenticides.</i>	<p>The potential increase of rodents and required management processes have been taken into consideration. This is an issue with is controlled at all racetrack facilities throughout Australia.</p> <p>To prevent rodents from accessing soiled bedding, the manure hopper/bins will be fully enclosed with a roof and doors. The floor and walls of the hopper will be constructed of concrete, assisting in the weekly cleaning process. A whirlybird vent will be placed on the roof to prevent the build-up of gases in the hopper. Baiting stations will also be installed by an accredited pest control expert. Directions will also be given to keep the hopper closed when not in use. To prevent infiltration of flies and vermin, the manure hoppers will always be kept closed unless being used. These practices and enclosed nature of the hopper will prevent the infiltration of vermin.</p> <p>The MTC removes any manure off site in accordance with industry standards and will continue to do so with the new complex. The two contracted organisations which complete this process have indicated that they have the capacity to take the extra soiled bedding that will be generated from the new complex.</p> <p>Management procedures will include:</p> <ul style="list-style-type: none"> • Daily cleaning of both boxes and complex blocks, • Feed rooms will be closed when not in use with feed bins having lids, • Rodent baits placed around the stable complex and installed by an accredited pest control expert, as per the rest of the MTC complex, • Manure hoppers will be enclosed when not in use and consistently emptied as contracted.
<i>The application does not examine the potential impacts on the continued use of adjoining public recreational facilities and the potential cost to the community of these impacts or the loss of these facilities.</i>	<p>There is no direct impact on the continued operation and use of the existing recreation facilities. The MTC considers that the new development would enhance the current sporting precinct surrounding Kincaid and Beckwith Streets.</p> <p>The introduction of this facility will encourage greater employment and potentially increased demand and use of adjacent residential, sporting and recreation facilities. Additional population in the local area will sustain demand for residential dwellings and use of local recreation facilities.</p>
<i>Potential for and management of equine diseases and their transfer to surrounding community.</i>	<p>The potential for equine disease is mitigated through stringent rules and compliances that all registered trainers always must adhere to. These guidelines are regularly policed by the local Racing Authorities by the way of regular and additional random stable inspections.</p> <p>Racing NSW Minimum Standards & Guidelines for Equine Welfare document point S 4.5 states that '<i>Horses must be vaccinated</i></p>

Matters raised in submissions	Response
	<p><i>against disease in accordance with the Rules of Racing and local veterinary advice'.</i></p> <p>Point 5, letter G of the Racing NSW Equine Welfare document explains '<i>if that horse is in need of veterinary treatment (including ongoing veterinary treatment), it is not to be transferred to a new home until that veterinary treatment has been provided or Racing NSW is satisfied that it will receive that veterinary treatment'.</i></p> <p>Due to the Equine Influenza outbreak which occurred a number of years ago, the industry has developed strong protocols dealing with bio-hazards and equine diseases.</p> <p>Large penalties apply to any trainer or licenced horse people who breaks any regulations set out by Racing NSW.</p> <p>The complex will also be secure and at all times, and the club will have the ability to quarantine the complex, if needed.</p>
<i>Further justification with regard to the unsuitability of other locations for the development within the MTC site that would be further removed from nearby residentially zoned land.</i>	Further justification is included within section 4.2 of the SEE.

Further to the DA public notification period, several letters have been received by the MTC and are attached to this report. Support is received from both residents who are within close proximity to existing stables surrounding the MTC and a trainer who has not received any complaints or issues with their existing stables operation.

7.3 Dust

The overall objective for dust impact management for the proposal will be to ensure that the design, construction, operation and management of the facility minimises dust generation that may affect sensitive land uses in the locality.

The design of the new complex has considered ongoing management that will avoid dust impact, including sealed driveways and parking areas, landscaped areas and ongoing management of operations that mitigate and control potential areas of dust generation.

There is expected to be minimal impact from any dust generated by the proposal.

The following management measures are to be undertaken for the management of dust from the site:

- Watering of grassed areas, garden beds and trees to maintain healthy vegetation and minimise dust
- Feed stores to be enclosed in order to prevent dust
- Use of suitable bedding that is not a significant source of dust when replacing
- Any unpaved surfaces which lead to visible dust leaving the site to be watered
- MTC ground staff to undertake regular odour surveys to ensure odour is not occurring offsite.

7.4 Noise

The overall objective for noise impact management for the proposal is to ensure that noise levels generated by onsite activities do not have unacceptable impact on sensitive land uses in the locality.

The existing MTC racecourse operates within current standards to avoid noise impact on adjoining land uses, in particular residential dwellings. Generally, stabling activities do not generate excessive noise impact over typical background levels evident in the local area. Beckwith and Kincaid Streets are high trafficked local roads that carry a mixture of light and heavy vehicles (see accompanying TIA). The local area also includes other non-residential activities including hotel and club, together with their associated carparks.

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.

An Acoustic Assessment Report (AAR) has been prepared to address Council's concerns in relation to potential sources of offensive noise that could impact nearby residential receptors. The AAR assesses operational and management matters as detailed in Council's correspondence of 14/5/20, and concludes:

"With the implementation of the management measures provided in Section 5, GHD considers the development acceptable from an acoustic perspective and should not adversely affect the acoustic amenity of the surrounding environment."

Main operational activity time thresholds are detailed in section 4.6.3 above, together with a description of typical race day and away race day activities. During normal operational times, noise sources will generally consist of:

- the movement of horses, including tending and handling
- general manual maintenance tasks, including manually operated tools, gates etc
- mechanical plant
- staff & service vehicles entering and exiting
- loading/unloading of horses, supplies and waste

All horse tending activities are done manually with equipment that does not require air compressing or any other noisy plant equipment. This type of equipment is avoided as they would naturally startle the thoroughbred horses.

Trackwork activities that may generate potentially offensive noise between 4:30am and 7:30am would include:

- Arrival of trainers and saddling of horses ready for trackwork
- Warming up horses
- Trackwork, which is completed on the race track (as occurs currently) with direct access from the stable complex
- Cooling down of horses following exercise
- Race day preparation
- Cleaning of the complex and individual horse boxes.

All service vehicles will enter during general business hours, with all other vehicles to enter at the request of the tenant, abiding by the terms and conditions set by the club. The gates will be locked with the trainers having remote access for emergencies. Each trainer will be required to sign a contract stating they will abide by the management protocols that are set by the MTC.

The delivering and collecting of horses occurs between trackwork start and general business hours, except for emergencies. All service vehicles will be granted access during business hours, except for emergencies. This will be contracted to the successful trainer group to ensure compliance.

Management practices are included in the recommendations of the accompanying AAR.

The proposed stabling activities will be conducted in accordance with appropriate guidelines including the EPA Noise Policy for Industry.

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.

Odour impact from the proposed development has been assessed by GHD in the accompanying Odour Assessment Report, including a review of site, proposed operations, expected waste and management processes and data modelling. The Odour assessment made the following recommendations to be incorporated into the development:

- *Implementation and continual compliance with the WMP.*
- *Daily cleaning of stalls including the removal of all manure and soiled bedding.*
- *Design of the manure hoppers to be enclosed. The manure hoppers should remain closed whenever possible.*
- *Establish an odour complaint management system for receiving and readily providing feedback to the community*

The proposed development will adopt the recommended measures and develop an odour complaint system to ensure odour impact is appropriately managed and impact to nearby receptors is mitigated.

As outlined by Council, odour sources may include, but are not limited to:

- The horses
- Manure and soiled bedding existing in stalls or in other areas of the site prior to daily clean up
- Feed and clean bedding stores
- Other types of waste storage
- Horse transit vehicles accessing the site

In relation to all possible odour sources, GHD have advised (as per email 17/7/20 – see attached):

Providing the waste management plan contains provision for daily cleaning then odour impacts are not anticipated. No other significant sources of odour are identified which would likely lead to any offsite odour impacts, as long as daily washing and cleaning is undertaken.

The following management measures are to be undertaken for the management of dust and odour from the site:

- *Watering of grassed areas, garden beds and trees to maintain healthy vegetation and minimise dust*
- *Feed stores to be enclosed in order to prevent dust*
- *Use of suitable bedding that is not a significant source of dust when replacing*
- *Any unpaved surfaces which lead to visible dust leaving the site to be watered*
- *MTC ground staff to undertake regular odour surveys to ensure odour is not occurring offsite.*

7.6 Bushfire

The subject land is not located within a bushfire zone as per the below mapping extract.

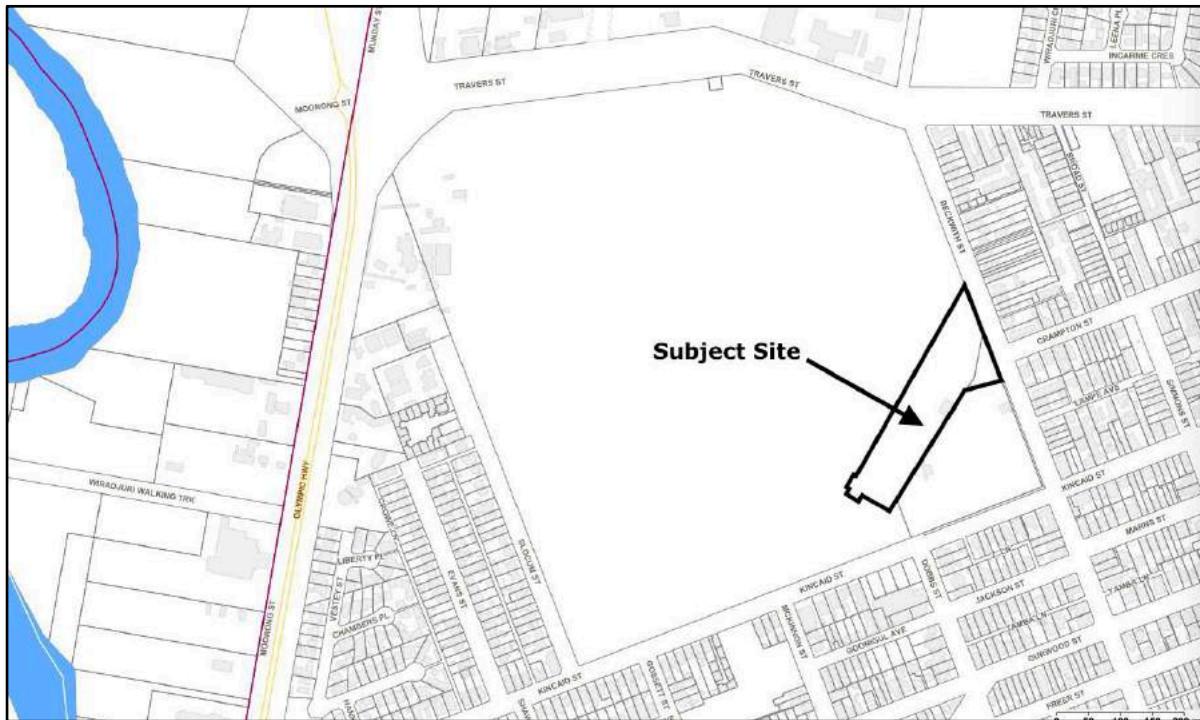


Figure 31: Bushfire Map extract (Source: WWCCGIS 2019)

7.7 Flooding

The subject site is not subject to flooding as per the below mapping extract.

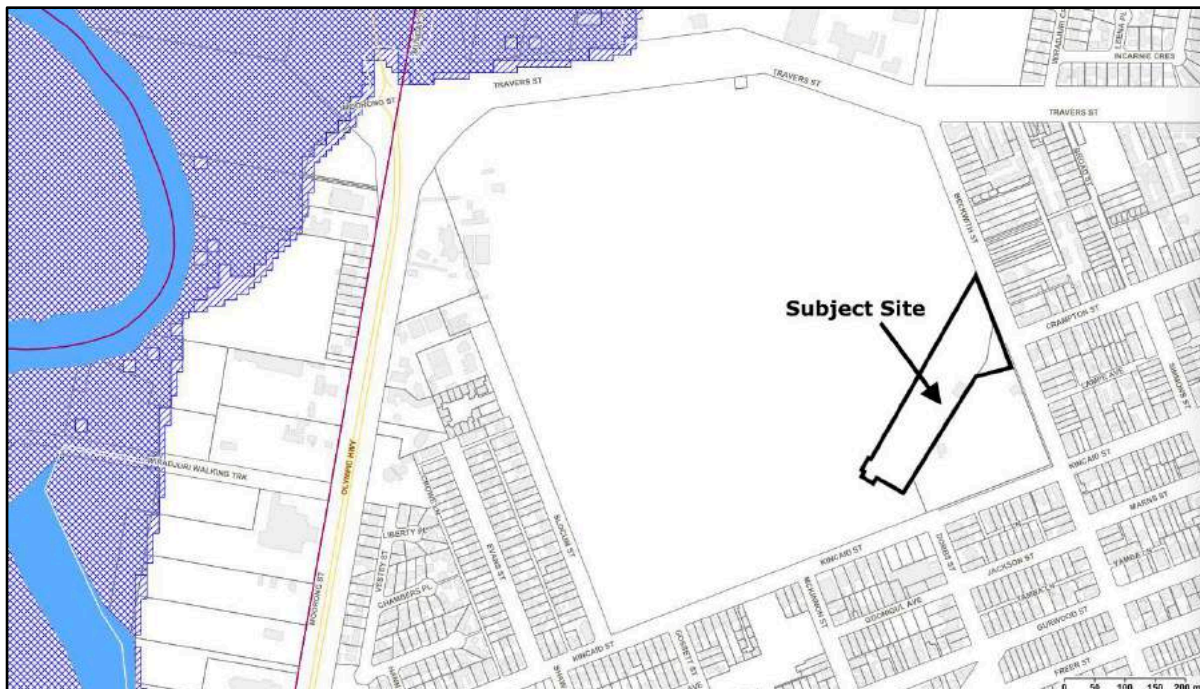


Figure 32: Flooding map extract – 2017 model (Source: WWCCGIS 2019)

7.8 Flora and Fauna

There is no significant vegetation within the subject site of the proposed development. The proposal does not require the removal of any trees and will result in a number of additional trees and landscaped areas.

An extract from the Office of Environment and Heritage Wildlife Atlas is below, which identifies a 2013 sighting of the endangered Squirrel Glider (*scientific name*) nearby. As there is no vegetation within the development area that would provide a native habitat, it is considered that the development will not have a negative impact on this species.

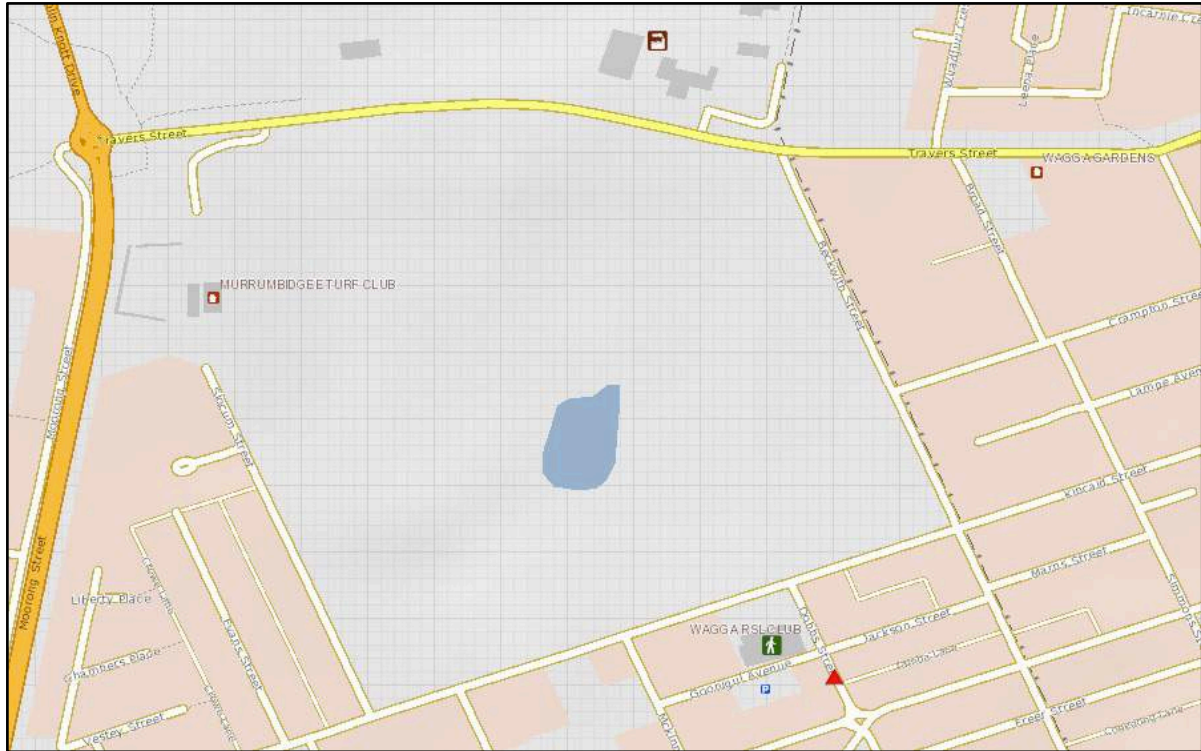


Figure 33: Wildlife Atlas Map (Source: OEH Wildlife Atlas 2019)

7.9 Natural Resources Sensitivity

The subject site is mapped sensitive to Groundwater as per the below LEP mapping extract. Scattered areas of land mapped sensitive to Biodiversity affect the greater MTC site, however the proposed area of development does not have any affected areas. No impact to biodiversity is expected as a result of the proposal.

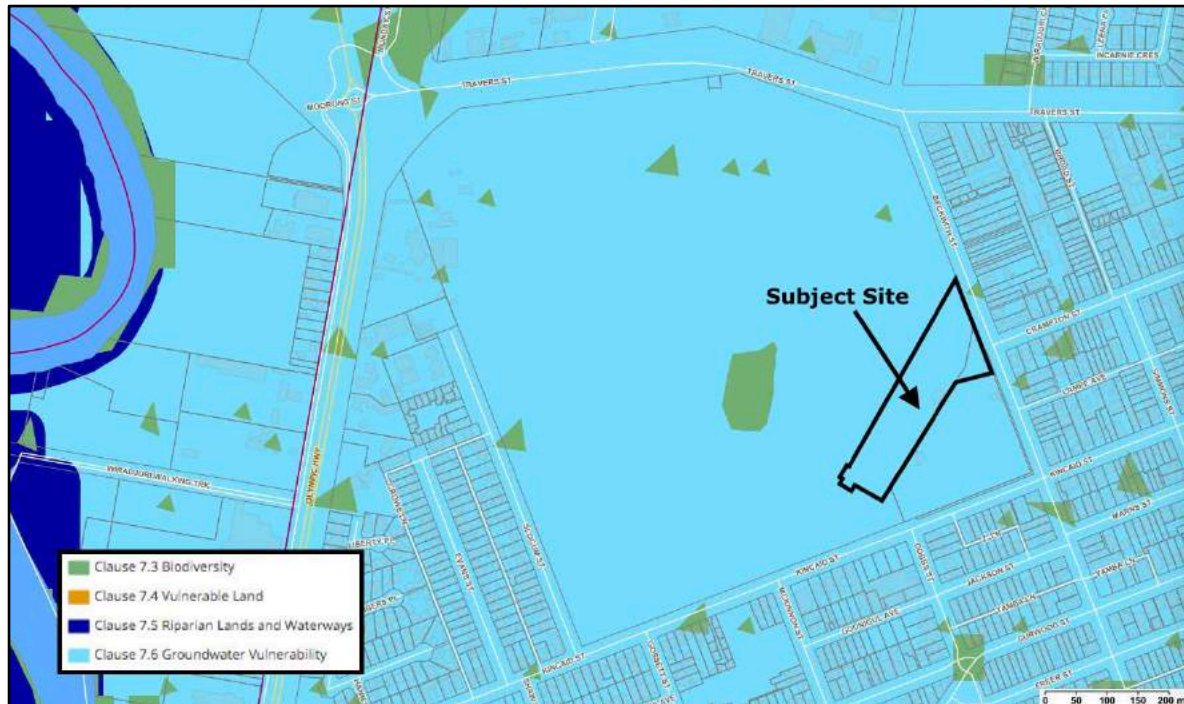


Figure 34: Biodiversity, Riparian Lands & Waterways & Groundwater Sensitivity Map (Source: WWCCGIS 2019)

The subject site is mapped as sensitive to groundwater and reference to Clause 12 of WWDCP 2010 Section 5.4 Environmentally sensitive land is required. However, the proposal does not fall within any of the prescribed land uses and no further assessment is required.

7.10 Site Contamination

Consideration of site contamination is a statutory requirement when considering development applications. Relevant guidelines prepared under State Environmental Planning Policy No.55 (SEPP55) provide an outline of matters to be considered in this respect.

The history of land use of the subject land needs to be considered as an indicator of whether land contamination is a potential issue. Where there is no reason to suspect contamination after acting substantially in accordance with the SEPP55 Guidelines, the proposal may be processed in the usual way. However, where there is an indication that the land is, or may be, contaminated, the appropriate procedures outlined in the SEPP55 Guidelines should be followed.

The following information is provided to assist in an initial evaluation of the proposal in relation to site contamination.

Table 11: Contaminated Land Consideration – Initial Evaluation Data

Initial Evaluation Data	
Consideration of readily available information:	Response
a) <i>current zoning</i>	RE1 Public Recreation & RE2 Private Recreation
b) <i>permissible uses</i>	See section 6.3.2
c) <i>records from previous rezonings or rezoning requests</i>	No previous rezoning requests are known for the site.
i. <i>history of land uses including:</i>	Existing race course and cricket ground
ii. <i>development applications & building applications</i>	Previous DA's do not indicate a history of contaminating land use activities.
d) <i>aerial photo history</i>	Historic aerial photos are provided in section 3.3
e) <i>property file information & site owner information</i>	Historical information on previous development and building approvals were obtained from Council via GIPA.

Initial Evaluation Data	
f) <i>knowledge of council staff</i>	To be determined by Council during its initial evaluation of the proposal.
g) <i>adjoining property information</i>	No immediate adjoining properties, adjacent land consists of a hotel and residential dwellings.
h) <i>site inspection information including photographs</i>	Photographs are provided below.
Checklist questions (from SEPP55 Guidelines)	Response
a) <i>Are there any previous contaminated land investigations available for the site? If so, what were the results?</i>	No.
b) <i>Is there any history of activities, as listed in Table 1 of the Guidelines, on the land, past or present?</i>	No.
c) <i>Was the land at any time zoned for industrial, agricultural or defence purposes?</i>	No.
d) <i>Is there any history of licences, past or present, regulating the use of activities listed Table 1 of Guidelines over the land?</i>	No.
e) <i>Are there any land use restrictions on the land relating to possible contamination (eg EPA or other authority)?</i>	No.
f) <i>Does site inspection data suggest a history of any activities listed in Table 1 of Guidelines?</i>	No.
g) <i>Is there any information concerning contamination impacts on land immediately adjacent the site that could affect the site?</i>	No.



Figure 35: Site photos (Source: SP 2018)

As shown in the figure below, the subject site is not listed in Council records as potentially contaminated. No potentially contaminating activities have occurred on the site according to all available historical data. A site inspection did not reveal any potential contamination issues on the site.

Based on the information available and presented in the table above, there is no reason to suspect contamination exists on the subject land. It is considered that no further investigation is required and the proposal may be considered and processed accordingly.

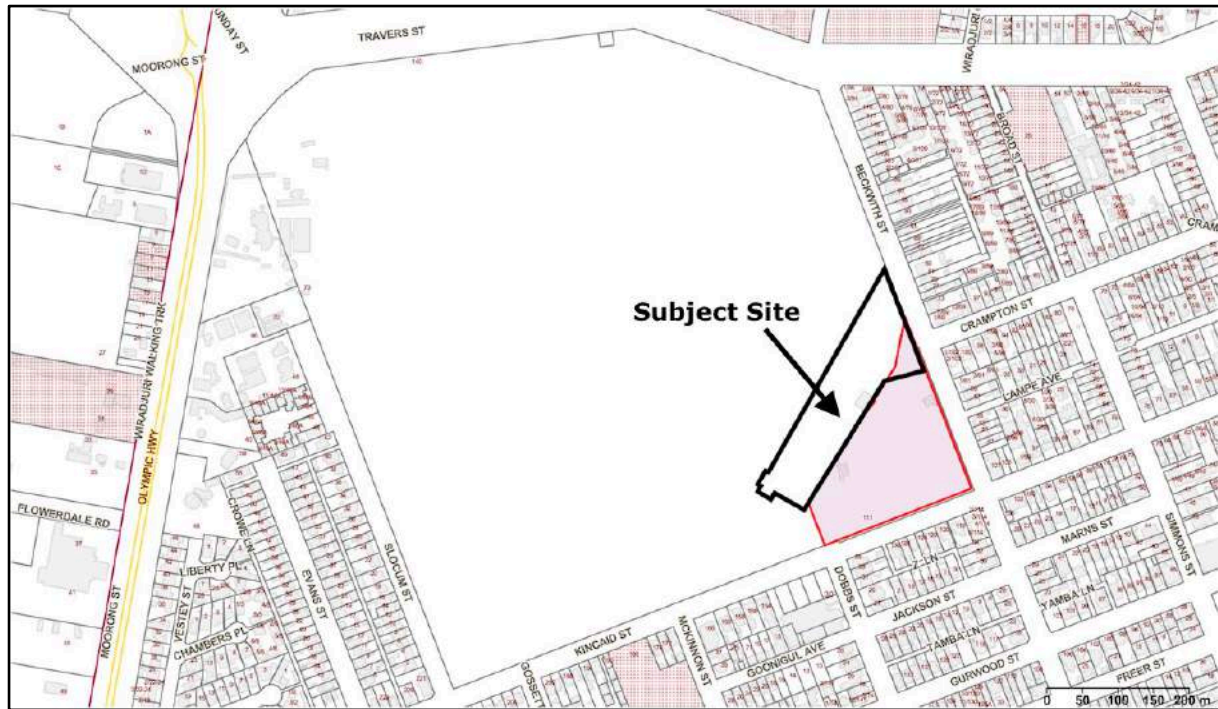


Figure 36: Potentially Contaminated Register Mapping (Source: WWCCGIS 2019)

7.11 Economic and Social Impact

The economic and social impact to the local precinct is anticipated to be generally positive. The proposal will increase activity in the general area through construction and operation with the flow on benefits of employment and community interest.

7.12 Site Suitability

Based on the assessment conducted in the sections above, it is considered that the site is suitable for the proposed development as it is an expansion of the existing MTC racecourse activities where existing infrastructure and sufficient site area exists. The proposal meets the statutory permissibility criteria for the site and, based on preliminary assessment, will not have any significant detrimental environmental impact on the locality.

7.13 Public Interest

The public interest is supported with this application as the proposal has been prepared in accordance with the publicly endorsed planning policies and guidelines to ensure compatible and sustainable development on this site and within the future desired character of the locality.

The proposal will also provide greater social and economic benefits to the local and wider community by facilitating development over MTC land to meet current and future demands for the local thoroughbred racing industry.

7.14 ESD Principles

A particular aim of the LEP (clause 1.2(2)(b)) seeks to promote development that is consistent with the principles of ecologically sustainable development and the management of climate.

A number of principles underpin ecologically sustainable development including:

- The precautionary principle.
- Intergenerational equity.
- Biodiversity and ecological diversity.

- Improved economic valuation including environmental factors.

The proposal has been considered in respect of these ESD principles.

a) The precautionary principle — namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

The proposal has the benefit of accurate data sourced from various studies that accompany this SEE. It is the opinion of environmental experts engaged in this assessment that there are no imminent threats of serious or irreversible environmental damage that would eventuate as a result of the approval, establishment and operation of the proposal.

b) Inter-generational equity — namely, that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.

The proposal has considered inter-generational equity issues and concludes that the proposed development will assist in protecting the integrity and productivity of the local environment, and ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.

c) Conservation of biological diversity and ecological integrity.

The content of this SEE and the supporting technical reports and plans, provide confidence that this proposal will, where practically and physically possible, conserve biological diversity and ecological integrity of the natural environment.

d) Improved valuation and pricing of environmental resources.

The proposal has considered and is implementing the principles of ensuring that environmental factors are included in the valuation of assets and services in relation to the existing environment and future development. The principles of “polluter pays”, full life-cycle costs and pursuing sustainable environmental goals are an integral part of the proposed development activity for this site. The development and approval/compliance systems that oversee the subject land use activity ensure continuing respect and achievement of this ESD principle.

7.15 Other Impact Considerations

Flies and Vermin

See accompanying Waste Management Plan for details on managing waste and mitigating any potential impact.

In relation to flies and vermin, in order to address any potential impact, the management procedures will include the daily cleaning of both boxes and the complex blocks. Feed rooms will be closed when not in use and the feed bins will have lids. Rodent baits will be placed around the stable complex and installed by an accredited pest control expert, as per the rest of the MTC complex. The waste skip bins will be enclosed when not in use along with being consistently emptied as contracted.

Lighting

The stable complex will have external under eave fluoro lighting throughout each stable complex that will meet the Australian National Standard, to be designed in the Detailed Design phase of the development. There will be bollards throughout the complex for pedestrian lighting, as shown on the revised plan set (XP – Sheet 6). There will be no lighting directed towards Beckwith Street.

Onsite lighting will be non-intrusive. It is noted the existing adjoining tennis courts and cycling track have existing tower lighting that are active until 10pm on evenings of use. No tower lighting will be installed at the complex.

7.16 Statement of Environmental Effects Summary Table

Table 12: Statement of Environmental Effects

Proposed Stable Complex - 60 Beckwith Street			
Subject Area	The potential environmental impacts of the development	How the environmental impacts of the development have been identified	The steps taken to protect the environment or to lessen the expected harm to the environment
Context & Setting	Minimal	Visual observation, interpretation of land uses.	Quality building design, site layout and landscaping treatment.
Access & Traffic	Minimal	Existing and projected traffic volumes in the locality, current experience from other establishments, site analysis. See TIA.	Development in accordance with applicable standards and policies.
Infrastructure	Negligible	Analysis of existing infrastructure provision. Data from service authorities. Management plans.	Connection to existing services in accordance with the requirements of the servicing authority. Onsite works where possible to minimise impact on existing infrastructure.
Heritage	Negligible	Review of heritage provisions, items identification, consideration of siting, context and potential impact.	Consideration of site, proximity to items, construction materials, design features and landscaping.
Archaeology	Nil	Local & State policy. AHIMS.	Not applicable
Land Resources	Nil	Local knowledge and site inspection.	Not applicable
Soils	Minimal	Local records and available history.	Appropriate mitigation measures implemented as necessary.
Air & Microclimate	Nil	Site & development assessment, local records. Odour impact report, waste management plan.	Appropriate mitigation measures implemented as necessary.
Flora & Fauna	Nil	Site inspection & local knowledge.	Not applicable.
Waste	Minimal	Development assessment and usage details. Waste management report.	Waste management and disposal in accordance with Council guidelines.
Noise	Minimal	Usage details. Local conditions.	Operations will be in accordance with legislative guidelines.
Natural Hazards	Negligible	Local records and available history.	Appropriate mitigation measures implemented as necessary.
Social Impact	Positive	Local policy & knowledge.	Not applicable
Economic Development	Positive	Local records and available history.	Not applicable
Design	Minimal	Visual assessment. Local policy & knowledge. Design drawings.	Quality building design, site layout and landscaping treatment.
Construction	Minimal	Visual Assessment. Local knowledge. Site conditions, local precinct character.	Construction works in accordance with relevant codes & guidelines.

8 CONCLUSION

The proposal has been considered in respect of current planning policy and local environmental conditions, together with consultation with the local planning authority.

The addition of a new stable complex to the MTC racecourse has been considered in respect to appropriate siting and any potential impact on neighbouring land and residences. The MTC is a significant contributor to local economic, social and community networks of the City and the proposal will assist in securing its ongoing sustainable future operation.

The development as proposed is justified and permissible, for the following reasons:

- Satisfies State Environmental Planning Policy provisions relevant to the proposal;
- Satisfies and supports the current strategic planning directions of the city;
- Meets key local character principles relevant and appropriate for the immediate area;
- Is permissible under the provisions of the Wagga Wagga Local Environmental Plan 2010 and meets the objectives of the zone and other relevant clauses;
- Satisfies and complies with the provisions of the Wagga Wagga Development Control Plan 2010 where relevant; and
- Will not have any significant adverse impact on the immediate natural and built environment.

The proposal is submitted for assessment and determination by the consent authority.

16063: Document History

Revision No.	Date	Authorised By		
		Name/Position	Initial	Notes
Rev 1.0 – Draft	21/10/19	Kyan Hyde Projects Coordinator	KH	Preliminary draft for internal review
Rev 1.1 – Edited Draft	23/10/19	Rhiana Turner Assistant Planner	RT	Required edits to document
Rev 1.2 – Edited Draft	23/10/19	Garry Salvestro Director	GS	Required edits to document
Rev 1.3 – Edited Draft	24/10/19	Rhiana Turner Assistant Planner	RT	Required edits to document
Rev 1.4 – Edited Draft	24/10/19	Kyan Hyde Projects Coordinator	KH	Internal review
Rev 1.5 – Final Draft	13/11/19	Rhiana Turner Assistant Planner	RT	Issued for client review
Rev 2.0 Final	27/11/19	Garry Salvestro Director	GS	Issued for DA lodgement
Rev 2.1 Revised Final	24/7/20	Garry Salvestro Director	GS	Revised Issued re RFI 14/5/20



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