



**DEVELOPMENT APPLICATION
NO. 2021/129 (AMENDED)**

GREYHOUND TRAINING & BOARDING ESTABLISHMENT

AN ANIMAL LIBERATION SUBMISSION



ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of country throughout Australia and recognise their continuing connection to land, waters and culture.

We acknowledge that this document was written on land stolen from and never ceded by the Gadigal People.

We pay our respects to their Elders past, present and emerging.



We don't have a duty to **speak** for the animals;
we have an obligation to be **heard** for the animals. - Matt Ball

DOCUMENT DETAILS

Animal Liberation. 2022. A submission by Animal Liberation in response to the Development Application (DA) No 2021/129 lodged by Greyhound Racing NSW (GRNSW) for an Animal Boarding and Training Establishment at 1949 Martindale Road, Denman, in the Muswellbrook Shire Local Government Area (LGA).

Prepared by Lisa J Ryan, Alex Vince, and Nadia Kiternas

ABOUT ANIMAL LIBERATION

Animal Liberation has worked to permanently improve the lives of all animals for over four decades. We are proud to be Australia's longest serving animal rights organisation. During this time, we have accumulated considerable experience and knowledge relating to issues of animal welfare and animal protection in this country. We have witnessed the growing popular sentiment towards the welfare of animals, combined with a diminishing level of public confidence in current attempts, legislative or otherwise, to protect animals from egregious, undue, or unnecessary harm. Our mission is to permanently improve the lives of all animals through education, action, and outreach.

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CONTACT & ENQUIRIES

Lisa J Ryan, Regional Campaign Manager
Alex Vince, Campaign Director
Nadia Kiternas, Digital and Social Media Strategist

Animal Liberation
Suite 378
846-850 Military Road
Mosman NSW 2088

Web: www.al.org.au
Email: lisa.r@animal-lib.org.au and alex@animal-lib.org.au
Phone: (02) 9262 3221
ABN: 66 002228 328

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DISCLOSURE

In line with section 147(4) of the Environmental Planning and Assessment Act 1979, Animal Liberation confirms its understanding and acceptance that any submissions made in respect of the proposed development are available for public inspection under the provisions of the Government Information (Public Access) Act 2009 (GIPA Request).

In line with Amendments to Local Government and Planning Legislation requiring the public disclosure of donations or gifts when lodging or commenting on development proposals, Animal Liberation discloses and confirms that it has not made any political donations and/or of gifts in the 2 years preceding the application.



20 July 2020

Muswellbrook Shire Council

Email: council@muswellbrook.nsw.gov.au



ATT: Muswellbrook Shire Council

We submit this further submission on behalf of Animal Liberation.

In addition to our initial submission dated 23 November 2021, Animal Liberation welcomes this opportunity to lodge a further submission to Muswellbrook Shire Council in response to DA 2021/129 (Amended) lodged by Greyhound Racing NSW ('GRNSW') for an Animal Boarding and Training Establishment at 1949 Martindale Road, Denman, in the Muswellbrook Shire LGA.

We request that it be noted from the outset that the following submission is not intended to provide an exhaustive commentary or assessment in response to the issues contained within the scope of the DA (Amended), and/or, the Applicant's corresponding Statement of Environment Effects ('SEE'), related documents and plans.

Rather, our submission is intended to strongly reaffirm our 23 November comprehensive submission and all points of objection; and provide a general examination and responses to select areas of key concern in the amended DA. As such, the absence of discussion, consideration or analyses of any particular aspect or component must not be read as or considered to be indicative of consent or acceptance. For the purposes of this submission, Animal Liberation's focus covers aspects that we believe warrant critical attention, and response in line with information available to us.

Whilst we note the stated intent of the GRNSW planning proposal and its direct correlation to the NSW greyhound racing industry's Greyhounds As Pets ('GAP NSW') programme, after thorough consideration of the Applicant's DA, SEE, related documents and plans; together with the critical broader greyhound racing industry, including GAP NSW considerations, Animal Liberation remains strongly opposed to this planning proposal.

We have thoroughly reviewed and considered the Applicant's amended DA documents and associated plans, and the relevant planning framework and instruments at Council, State and Commonwealth Government levels.

We are requesting Muswellbrook Council and the Hunter and Central Coast Regional Planning Panel give due and objective consideration to the following points of objection, as well as our previous points of objection, including our general observations and commentary in response to the DA. We are requesting decision makers refuse this large-scale planning proposal which lacks planning merit and fails to address the needs of discarded NSW greyhounds, the local community and the NSW public.

Kind regards,

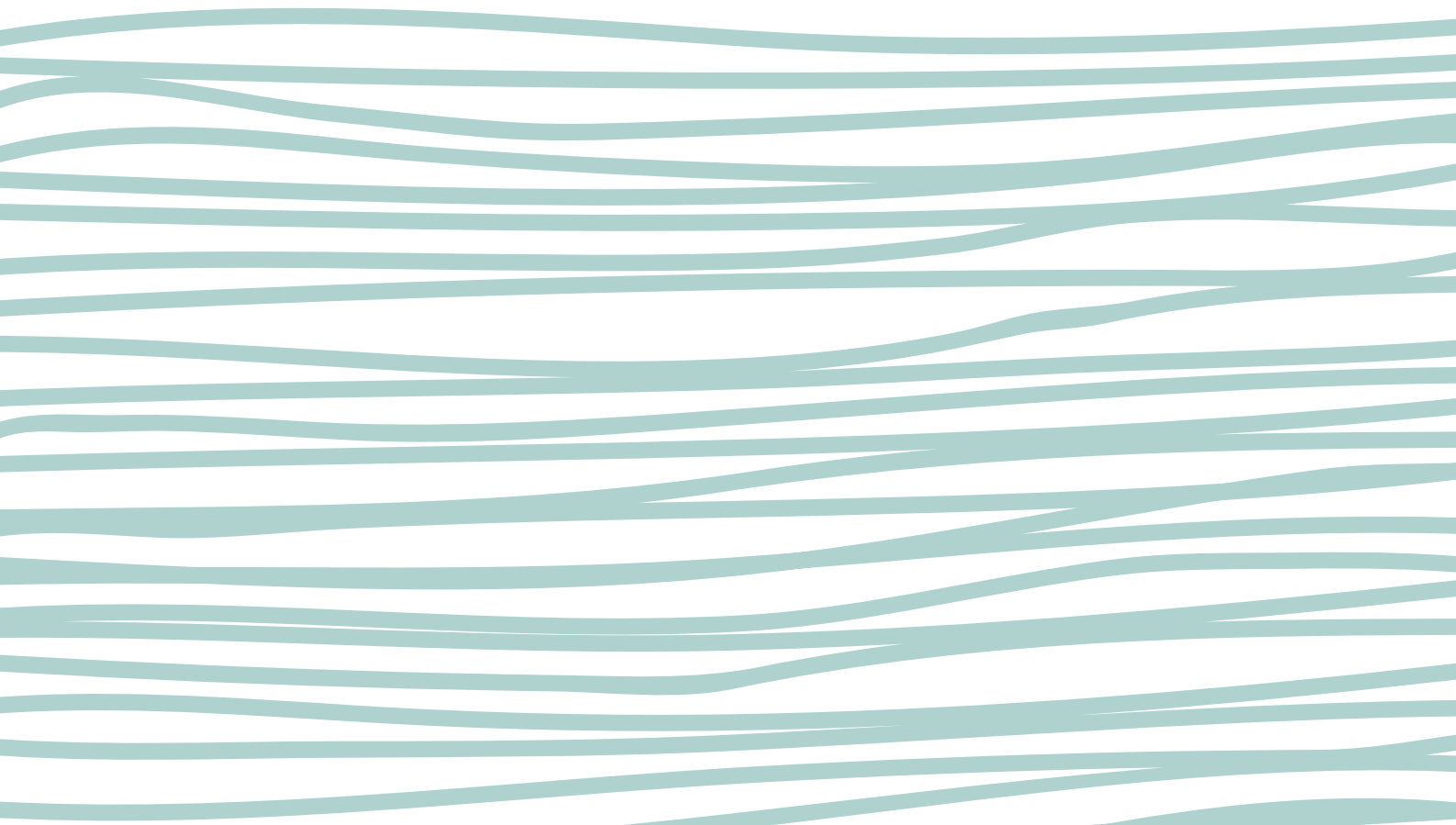
Lisa J Ryan
Regional campaign manager

Alex Vince
Campaign director

Nadia Kiternas
Digital & Social Media Strategist

SECTION ONE

PREAMBLE



SECTION ONE

PREAMBLE

Animal Liberation is strongly opposed to the greyhound racing industry in general. Our opposition is informed by and in response to the industry's inherent and entrenched culture and exploitation of greyhounds who are forced to run for gambling profits. This industry operates in direct opposition to the views and expectations of the wider Australian community who value and respect dogs as companions, not commodities.

As an animal rights organisation, Animal Liberation actively supports the concept of ethical and meaningful animal life-saving as opposed to life-taking. We endorse ethical and meaningful rescue, rehabilitation, and rehoming programmes, including the need for animal sanctuaries as an essential public service. We embrace the No Kill philosophy founded on 'quality of life', and the dedicated and committed role played by rescue, rehabilitation, and rehoming individuals and community organisations, who are predominantly self-funded and volunteer-based.

We do not however support the Industry's GAP NSW programme, based on our valid and evidenced concerns regarding GAP's own operations and performance. The warehousing of greyhounds at the proposed Muswellbrook facility is not the solution, and nor is it in the welfare or wellbeing interests of the NSW greyhounds who have been discarded by this appalling industry.

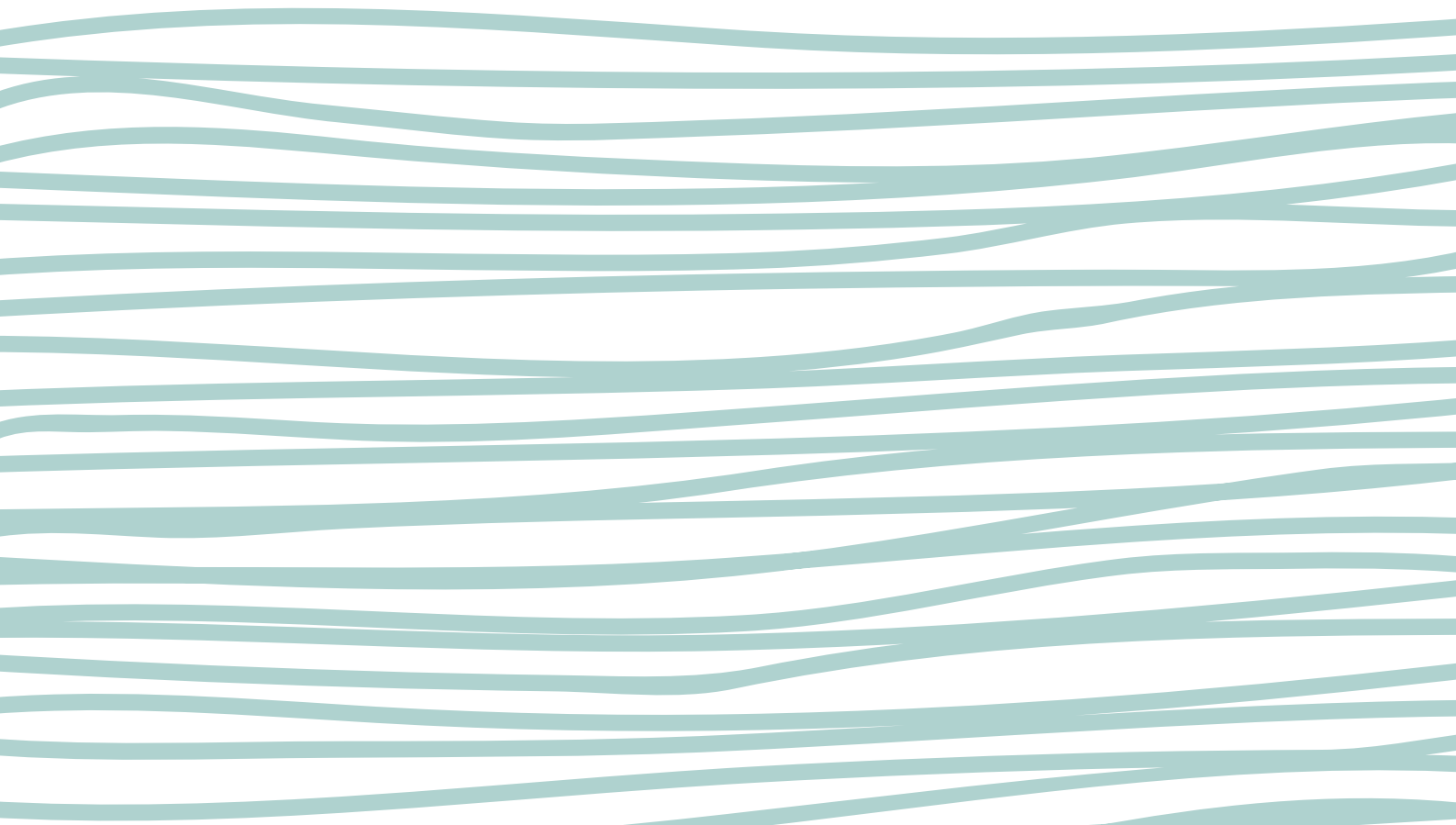
It is also of serious concern to Animal Liberation that the management of this DA by numerous parties (Muswellbrook Council, GRNSW and the Hunter and Central Coast Regional Planning Panel), both prior to and during the public exhibition periods has been fraught with notable ongoing issues.

These issues have harnessed diminished public confidence, frustration and confusion about the NSW planning process and oversight, and the mechanisms which are supposed to uphold and ensure good governance, transparency, public accountability and accessible public participation in decision making. The controversial status of this DA has now reached an almost unmanageable status of 'controversy'.



SECTION TWO

EXECUTIVE SUMMARY



SECTION TWO

EXECUTIVE SUMMARY

Ultimately, Animal Liberation contends that this proposal is a \$30 million dollar plus attempt to assuage public outrage and condemnation of the industry's greyhound 'wastage', abandonment, euthanasia and killing. In spite of the Applicant's best endeavours to present this proposal as a shelter or a sanctuary, Animal Liberation strongly rejects this proposition. We contend that based on GRNSW's and GAP NSW's history and performance, the proposed facility is no more than a state of the art warehouse where large numbers of individual slow, unprofitable, injured and discarded greyhounds will be stockpiled by the same industry who bred them, exploited them and then discarded them.

In relation to the actual proposed development and the Applicant's DA, the following high level matters also form part of our objection.

Animal Liberation holds that the Applicant has failed to identify, respond to, and address all risks and impacts (including cumulative risks and impacts) as required under Section 4.15 of the Environmental Planning and Assessment Act 1979 (EP&A Act).

We contend, the Applicant has:

failed to adequately demonstrate how they would monitor, avoid, minimise, mitigate, and manage these risks and impacts (including cumulative risks and impacts), as required under Section 4.15 of the EP&A Act.

relied on numerous assumptions and the submitted SEE is generally void of adequate justification or evidence to support many non-evidenced assumptions and conclusions.

failed to demonstrate adequate consultation with or consideration of sensitive receptors and the community including consideration of applicable buffer zones and amenity, adequate assessment of noise, odour, biosecurity, disease management and emergency management planning considerations.

failed to demonstrate adequate consultation with relevant agencies to obtain expert technical guidance or input including the NSW Royal Society for the Prevention of Cruelty to Animals ('RSPCA NSW'), the NSW Environment Protection Agency ('EPA') or the NSW Office of Environment and Heritage ('OEH').

failed to adequately consider and/or address all matters of "public interest" and the required relevant NSW animal welfare legislation, and has paid scant attention to the daily and ongoing welfare (physical, emotional and social) needs of the discarded GRNSW greyhounds which would be housed at the facility.

failed to demonstrate their compliance with the relevant NSW animal welfare legislation, and nor have they demonstrated their awareness, knowledge, or skills about modern and progressive best practice rehabilitation and rehoming practices.

failed to identify, differentiate and address the risks and impacts included in the separate 'construction' and 'operational' phases of the proposed development.

In addition, we wish to note and/or emphasise that:

the proposed development does not meet many of the objectives outlined in the Muswellbrook Local Environmental Plan 2009 ('LEP') in respect to the RUI Primary Production as applied to the subject land;

the proposed development provides no benefit to the local community or the public at large, and is not in the "public interest";

the lack of detail, and omitted detail in the Applicant's DA, SEE and plans will greatly restrict assessment staff and decision makers to undertake a comprehensive, objective and meaningful development assessment in line with the mandatory and applicable planning instruments, and public expectations.

Animal Liberation contends:

that the scale, character and nature of the proposed development is high-impact (i.e., is likely to generate pollution), and should be deemed Designated Development. As such, for the purpose of this planning assessment, the proposed development must be classified and assessed accordingly. This must include the requirement to compile and submit an Environmental Impact Statement ('EIS') in line with the Secretary's Environmental Assessment Requirements ('SEARs').

that the scale, character and nature of the proposed development and notably the significant risks and impacts relating to wastewater, general waste including dog waste, the biogas and anaerobic digester/reactor, should be deemed Integrated Development requiring consent and one or more approvals from a NSW State Government Agency under Part 4 of the EP&A Act, with any associated approval, licence, consent, permission or permit required under other legislation.

the Applicant's reference to existing infrastructure does not include consent for the housing or training of dogs.

the proposed development includes significant 'development' and 'operational' risks and impacts to the greyhounds, surrounding neighbours and the environment that cannot be managed or mitigated by the proposed site design or operational practices.

Finally, Animal Liberation disagrees that the proposed development can or will "maintain harmony with the landscape", or that proposed "future planting once established will further settle the buildings into the site". This is a large-scale development, similar in scale and character to the development of a service station or shopping centre, and will forever negatively change the character and harmony of the landscape.

**IF YOU REALLY
CARE ABOUT ANIMALS
STOP TRYING TO FIGURE OUT
HOW TO EXPLOIT THEM
"COMPASSIONATELY"**

JUST STOP EXPLOITING THEM

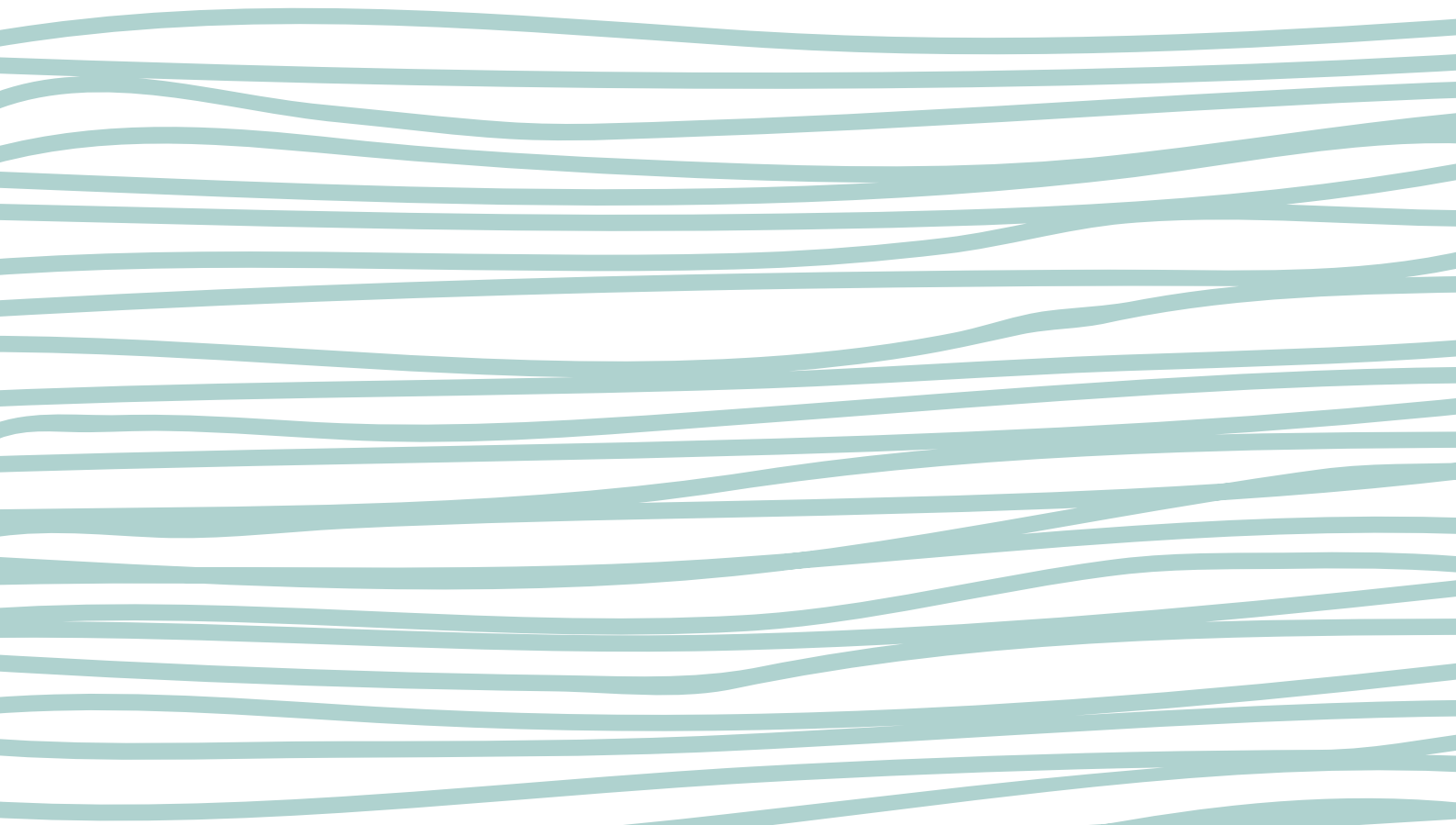
GARY FRANCIONE





SECTION THREE

INTRODUCTION



SECTION THREE

INTRODUCTION

Independent inquiries and reviews into the NSW greyhound racing industry have exposed an exploitative and commercial industry built upon systemic animal suffering, an entrenched culture of poor animal welfare standards and cruel practices. The industry however continues to resist meaningful change or reform. It contributes to the suffering and death of thousands of greyhounds every year. Millions of dollars of taxpayer money is wasted propping up this unsustainable and cruel industry which also fuels problem gambling.

The current national rate of annual greyhound breeding is six times the industry's capacity to rehome. NSW is one of the biggest racing states in Australia and yet community-run rescues still rehome more dogs than the cashed-up racing industry.


GAP NSW is a not-for-profit entity that recruits volunteer workers. This means they benefit from tax concessions and free labour. The GAP budget for 2020/2021 was a staggering \$4.9 million. Meanwhile, self-funded community rescue groups primarily rely on donations and volunteer effort.

Similarly, the Greyhound Welfare and Integrity Commission (GWIC) confirmed 1,418 greyhounds were "retired" in the same period. Yet GAP NSW only accepted 339 greyhounds (24%) while volunteer groups accepted 447 greyhounds (32%). Recent testimony given at the Select Committee on the Greyhound Welfare and Integrity Commission hearings included distressing accounts by volunteer organisations about the ongoing neglect of racing greyhounds and the overall performance of GAP NSW.

It's been six years since the live baiting expose in 2015. Yet the Australian dog racing industry's rehoming efforts are still failing greyhounds. Warehousing discarded NSW greyhounds at the proposed Muswellbrook Bylong Park facility is not the solution. Nor is it in the interests of the greyhounds who have been discarded by the industry.

Given the extensive volume of complex additional information submitted by GRNSW, Animal Liberation is extremely concerned that this further round of public consultation has been limited to a three-week period. The valid and ongoing concerns raised by the community about council's management of this DA, including council's selective communications, privacy breaches, and the inadequate three-week period to compile and lodge a submission in response to over 1,000 pages of new information from the Applicant, have not been adequately addressed. Further, conflicting information from council, the planning panel, and the NSW Department of Planning has only increased public confusion and frustration. We find it unacceptable that Muswellbrook Council has refused to address these valid concerns, including potentially misleading the community.

In line with the EP& A Act, decision-makers are required to thoroughly assess the adequacy of information provided. This includes any measures proposed by the Applicant to mitigate any potential risks and impacts, including cumulative impacts. Under the Act, due consideration must also be given to social impacts and public interest relating to the proposed development. Public perceptions, expectations and opposition towards the greyhound racing industry, including the intensive housing of companion animals, must also be considered.



The Applicant has failed to undertake adequate consultation with the local community and those who had expressly requested consultation. Rather than meaningful engagement intended to explore, consider and address legitimate concerns and issues, the limited consultation sessions held were akin to a GRNSW marketing exercise. The Applicant appears content to ignore or minimise the serious concerns raised by the community and the broad public. These include, but are not limited to, animal welfare and concerns associated with visual amenity and noise disruptions to an otherwise peaceful and tranquil lifestyle.

In spite of the ample period of time GRNSW has had to review the many valid and legitimate concerns already raised about the proposed development, the responses contained in the additional information submitted, still falls well short of being adequate or transparent. They have not adequately responded to all valid concerns. Similarly, they have failed to address the inadequate measures proposed to mitigate and manage identified risks and impacts.

The Applicant's SEE continues to rely on numerous assumptions, remains flawed and fails to adequately address all risks and impacts as required under the EP&A Act. Dismissing or deflecting from the many valid concerns raised is unacceptable.



THE CAPACITY FOR LOVE THAT MAKES DOGS SUCH REWARDING COMPANIONS HAS A FLIP-SIDE THEY FIND IT DIFFICULT TO COPE WITHOUT US SINCE WE HUMANS PROGRAMMED THIS VULNERABILITY

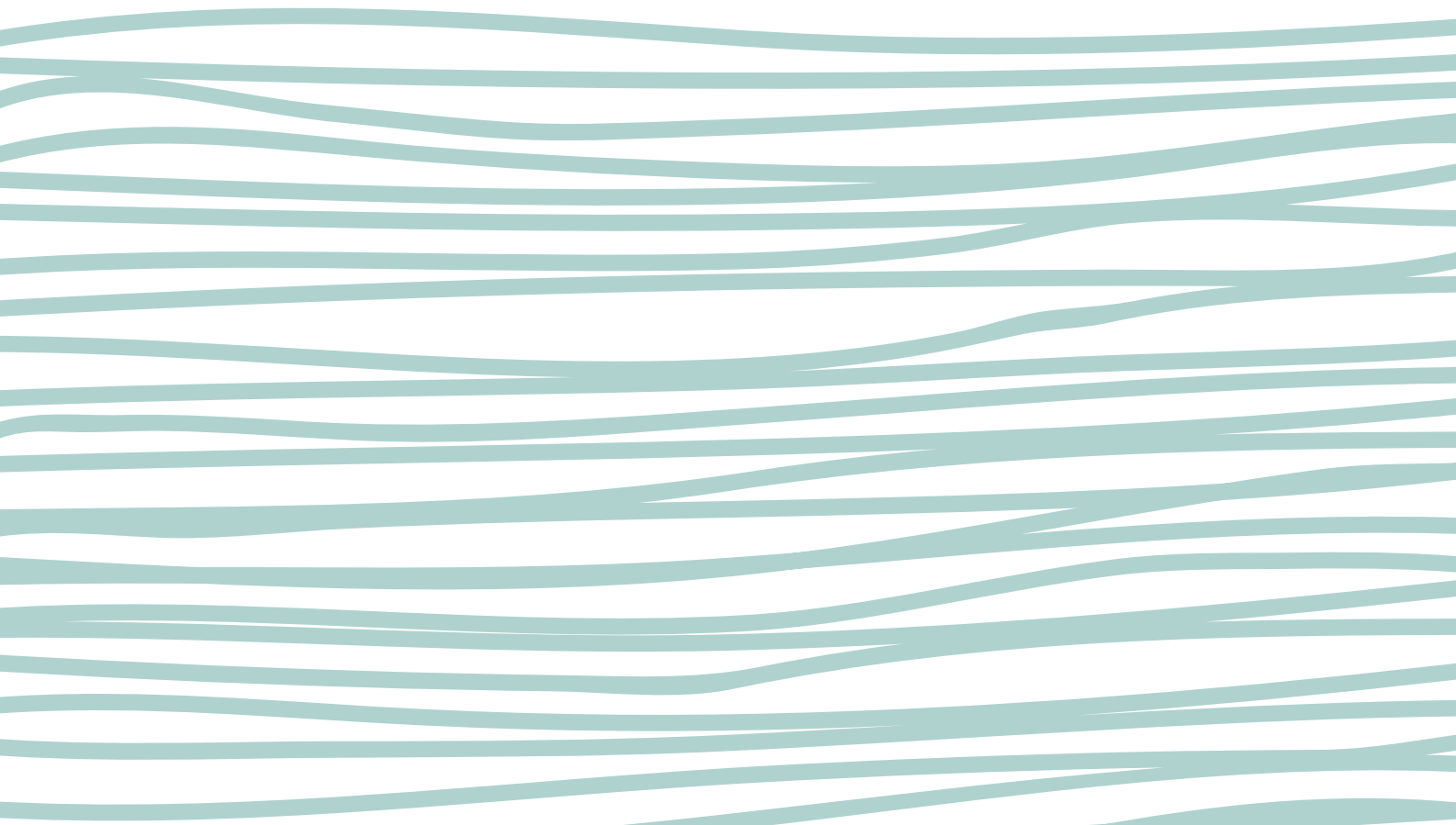
IT'S OUR RESPONSIBILITY TO ENSURE THAT OUR DOGS DO NOT SUFFER

JOHN BRADSHAW



SECTION FOUR

POINTS OF OBJECTION



SECTION FOUR

POINTS OF OBJECTION

4.1 SITE SUITABILITY

The site is unsuitable for the proposed development and lacks the critical essential services to allow safe and effective operation including access, communications, power, water, and waste water services.

The proposed landscaping will not address the serious visual amenity issues - the facility would be a permanent scar on the landscape.

The proposed development is not primary production and therefore fails to meet RUI Primary Production criteria and will greatly contribute to ongoing community and landowner conflicts.

While GRNSW as the Applicant has owned the property for around 20 months, they have failed to install a weather station to collect and compile local weather data or flood data. Instead they have relied on desktop reports based on modelling assessments.


- The data for the water and wastewater reports uses Patterson rainfall.
- The Odour report uses data from Jerrys Plains
- The acoustic (noise) report uses Williamstown wind data, is based on modelling, and the data has not been calibrated
- The flood report is based on the MacDonalld River

4.2 ANIMAL WELFARE

The NSW greyhound racing industry epitomises a cashed-up industry with slick marketing, commercial arrangements to secure paid and unquestioning media, and an evidenced history of hypocrisy in regards to its greyhound welfare claims. GAP NSW's budget for the 2020/2021 period was 4.938M, while NSW community-run and self-funded volunteer rescue groups primarily rely on donations and volunteer fundraising efforts. In spite of GAP NSW's large budget, the Greyhound Welfare and Integrity Commission (GWIC) confirmed 1,418 greyhounds were reported as 'retired' during the 2020/2021 period and yet GAP NSW only accepted 339 greyhounds (24%), while volunteer groups accepted 447 greyhounds (32%).

On this basis, Animal Liberation has serious concerns about the operations and performance of GRNSW and the industry-managed GAP NSW programme. Our concerns are evidenced by the industry's own reports. In addition, there are inherent conflicts of interest between GAP NSW and GRNSW's commercial interests. The warehousing of greyhounds at the proposed Muswellbrook facility is not the solution, and nor is it in the welfare or wellbeing interests of the NSW greyhounds who have been discarded by this appalling industry.

The proposed "No Kill" Bylong Park stands side-by-side an industry which continues to overbreed greyhounds. The current national rate of annual breeding rate is six times the industry's capacity to rehome greyhounds in an ethical manner in line with public expectations. The greyhound racing industry continues to rely on



“wastage”, with excessive greyhounds bred to ensure that a few dogs are considered competitive enough to race and generate gambling profits. 25% of greyhound puppies never reach the racetrack and are discarded by the industry with negligible industry oversight in place as to their outcome. Greyhounds who survive this process are forced to run on dangerous tracks that contribute to unacceptable greyhound injuries and killing, both on-track and off-track.

Though the Applicant claims that the Bylong Park facility would be No Kill, recent sworn testimony given at the current Select Committee on the Greyhound Welfare and Integrity Commission hearing held on 30 June 2022 included first-hand accounts from volunteer organisations. Their testimony confirmed what we already know. GAP has failed greyhounds. In FY2020/21, 20 greyhounds were euthanased as “behaviourally unsuitable” for rehoming, and 19 were euthanased after rehoming attempts failed. Further, GRNSW is not meeting its own rehoming targets and GRNSW’s definition of “rehoming” is highly questionable.

In spite of the above, the Applicant claims they will accept 100 greyhounds each year at Bylong Park and confirm 30 greyhounds would be transferred to the facility on opening. This admission would thereby reduce the 100 estimate to 70 in year one. The proposed GRNSW Bylong Park Animal Boarding & Training Facility will not lead to any improvement in rehoming performance from GAP NSW, and will likely only further whitewash a largely hidden industry.

The Applicant’s submitted ‘Greyhound Turnover Information’, Appendix F, is fanciful and its content is highly questionable. Given the stated purpose of this facility, it is imperative that these issues are thoroughly and objectively critiqued. This must be based on available data, current performance and publicly declared commitments that include GRNSW’s unrealistic rehoming targets as outlined in their FY2018–21 Strategic Plan. We note that the latter states 1,000 greyhounds would be rehomed through GAP each year and 1500 greyhounds would be rehomed through other volunteer organisations.

We are very concerned with the proposed inadequate staff ratio of six (6) in an emergency situation to cater for up to 400 greyhounds and we strongly contend that GRNSW and GAP NSW would, in such an instance fail to meet statutory obligations under the Prevention of Cruelty to Animals Act 1979 or the proposed new state based legislation, the applicable NSW Animal Welfare Code of Practice No 5 – Dogs and cats in animal boarding establishments or indeed applicable GRNSW and GWIC policies.

Given the stated purpose of this GRNSW facility, and the obvious issues which will be entrenched in many of these facility greyhounds, it is of significant concern to Animal Liberation that the Applicant has provided scant and negligible details in response to extremely important animal welfare considerations and how the Applicant will meet their legislative and ethical responsibilities. This includes the Applicant’s failure to address:

- Standard 7.3 of the NSW Greyhound Welfare Code of Practice referring to greyhounds displaying particular signs of stress, anxiety or stereotypic behaviours requiring veterinary intervention, (as opposed to vet nurse care) and how the facility will adhere to this requirement.
- The suitability or appropriateness of any proposed GRNSW rehabilitation and training programmes and GRNSW’s experience or competency in management such programmes and the relationship between current Standard 7.12 greyhound plans and proposed facility programmes.

4.3 STAFFING

The Applicant has not demonstrated how they will attract and retain staff and volunteers. The site which previously accommodate a horse stud struggled with staffing because of isolation, travel distance and lack of mobile and internet reception. The facility cannot function and the welfare and wellbeing of the greyhounds would be at high risk with inadequate staffing and next to no mobile and internet services.

4.4 ACCESS & SAFETY

Recent flooding has further confirmed the ongoing access issues and safety issues where site access was completely diminished with the low-level creek crossing for approximately one (1) week, and access could only be secured by helicopter. This poses serious human and animal welfare safety risks.

While we note the Applicant has not included local data but rather, has relied on data from the MacDonald River, local community members who are very familiar with weather conditions, have estimated the crossing could not be used for 75 days between March 2021 and March 2022.

The Applicant's flood plan includes six (6) staff to remain on site, however this would be completely inadequate to meet the welfare and wellbeing needs of the greyhounds, including an emergency vet situation, and will further contribute to significant risks and impacts with animal welfare, hygiene, biosecurity, noise and odour.

The Applicant appears determined to downplay the bushfire risks and impacts, when scientific evidence confirms the climate emergency has forever changed the landscape and adverse weather events and their frequency. Current access is limited to one way in and one way out, so if access is compromised, there is no alternate access and a potentially life-threatening scenario. For human and animal safety this is a significant risk and we strongly refute the Applicant's contrary claims.

Some members of the local community have, in the last decade, experienced two fire evacuation orders including instances of extreme 'threat' and risks including smoke inundation for a period of weeks.

Inadequate staffing, excess heat and smoke and animal fear cannot be managed by retaining dogs in kennels with wet towels. Further it is entirely inappropriate to expect staff or volunteers to remain at the facility in such instances to fight a fire. The Applicant's plans would pose significant risks to the safety of people and greyhounds.

The Applicant's Flood Impact Assessment and Flood Risk Assessment both rely on flawed and historical data from the 1970's and ignores the NSW Government's advice and warnings about changes to the climate and adverse weather events and their frequency, as included in various published literature including; AdaptNSW - Climate change impacts on storms and floods, NSW Water - New climate data and modelling and AdaptNSW - Climate projections used on AdaptNSW

The Applicant's proposition that firefighting equipment and roof sprinklers are not required from a bushfire design and compliance perspective is completely unacceptable.

4.5 ROAD

Martindale road is a substandard single lane rural road which already needs to accommodate local dual direction traffic, frequently forcing drivers to drive with two wheels on the verge to pass oncoming traffic. Recent accidents have included vehicles running off the road and valid local concerns have been expressed about the potential for head on collisions. The road is not suitable for existing local traffic and will certainly not accommodate an increased traffic flow.

While the Applicant has proposed to undertake work to the intersection, these works are not articulated in their cost analysis and neither is the proposed helipad.

Alarming, the Applicant's traffic report appears to have been compiled from the wrong end of the road - taken from the start of Martindale Road where it is a thoroughfare road, not where the road is no-through and near the site of the proposed facility.

Local community members estimate traffic flow includes 50-60 cars per day, effectively creating a 100% increase, which would also contribute to increased maintenance road costs to be borne by Muswellbrook ratepayers.

4.6 WATER

The Applicant appears ignorant of developments and amendments regarding NSW water sharing plans and has not demonstrated that they have secured the required licences under these plans (or for any proposed groundwater extraction). In a drought, the facility would be entirely reliant on trucking in water. This would pose a significant welfare risk and impact to the greyhounds at the facility, particularly in terms of drinking water and available water for kennel hygiene and cleanliness.

4.7 WASTE MANAGEMENT

We are particularly concerned about the proposed anaerobic digestion system and the Applicant's attitude to waste management. This important consideration relates to the potential for biosecurity risks and impacts and is also associated with potential runoff to the local creek and pollution incidents including dangerous chemicals.

The buffer zones, biosecurity, odour and amenity issues from the proposed irrigation of paddocks with the waste water and the dispersal of the sludge over the paddocks every few months, or alternatively trucked away must be clarified and specified - which is it, because both scenarios raise more questions which need to be examined with a level of expertise to explore environmental harm and community harm, including public health risks.

4.8 NOISE & ODOUR

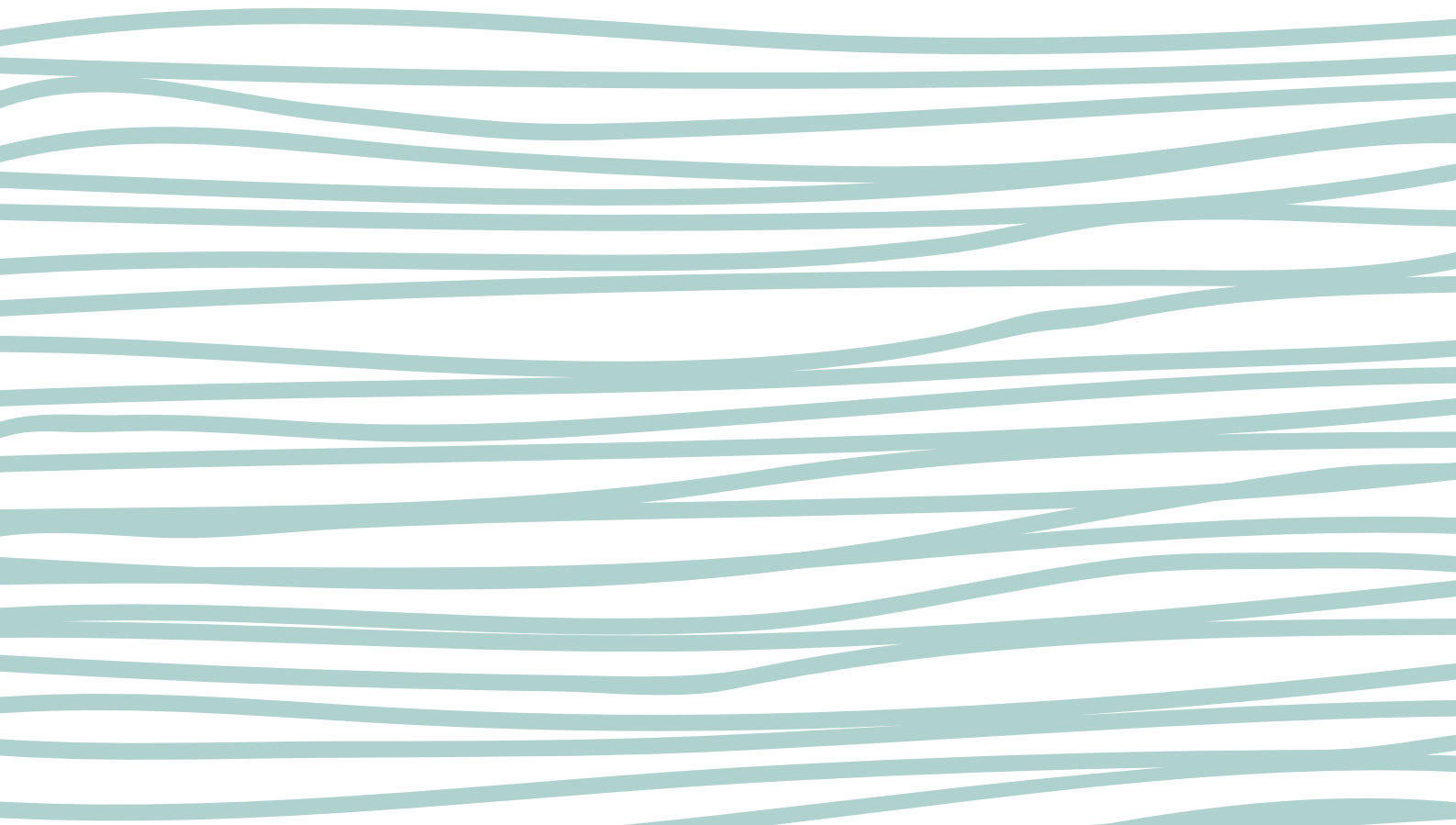
Topography and weather patterns determine noise and odour risks and impacts and the Applicant has failed to fully appreciate these risks and impacts, or listen to the views and concerns of local residents with 'lived' experience about how sound travels around the valley and the natural amphitheatre effect of the escarpment.

"Prevailing westerly winds" are actually from the north-to north-west, due to the way they are funnelled up the valley with other strong winds (storms) coming from the south.



SECTION FIVE

SUMMARY & CONCLUSION



SUMMARY & CONCLUSION

Animal Liberation contends the proposed development includes significant 'development' and 'operational' risks and impacts to the greyhounds, surrounding neighbours and the environment, and that these risks and impacts cannot be managed or mitigated by site design or operational practices.

We disagree that the proposed development can or will maintain harmony with the landscape", or that proposed future planting once established will further settle the buildings into the site." This is an extremely large scale development, similar in scale and character to the development of a service station or shopping centre, and will forever negatively change, risk and impact the character and harmony of the existing landscape.

Animal Liberation contends the Applicant has failed to identify, respond to, and address all risks and impacts (including cumulative risks and impacts) as required under Section 4.15 of the EP&A Act. Similarly, we contend that the Applicant has failed to adequately demonstrate how they would monitor, avoid, minimise, mitigate, and manage these risks and impacts (including cumulative risks and impacts), as required under Section 4.15 of the EP&A Act.

We strongly refute the Applicant's claims and the accuracy of their claims, included those contained within the Design Statement provided in Appendix J by Tzannes, which states that the design of Bylong Park Farmstay "reflects a deep understanding of the physical and psychological requirements of greyhounds in short, medium, and long-term care" (Adronicos in Tzannes 2021: 8).

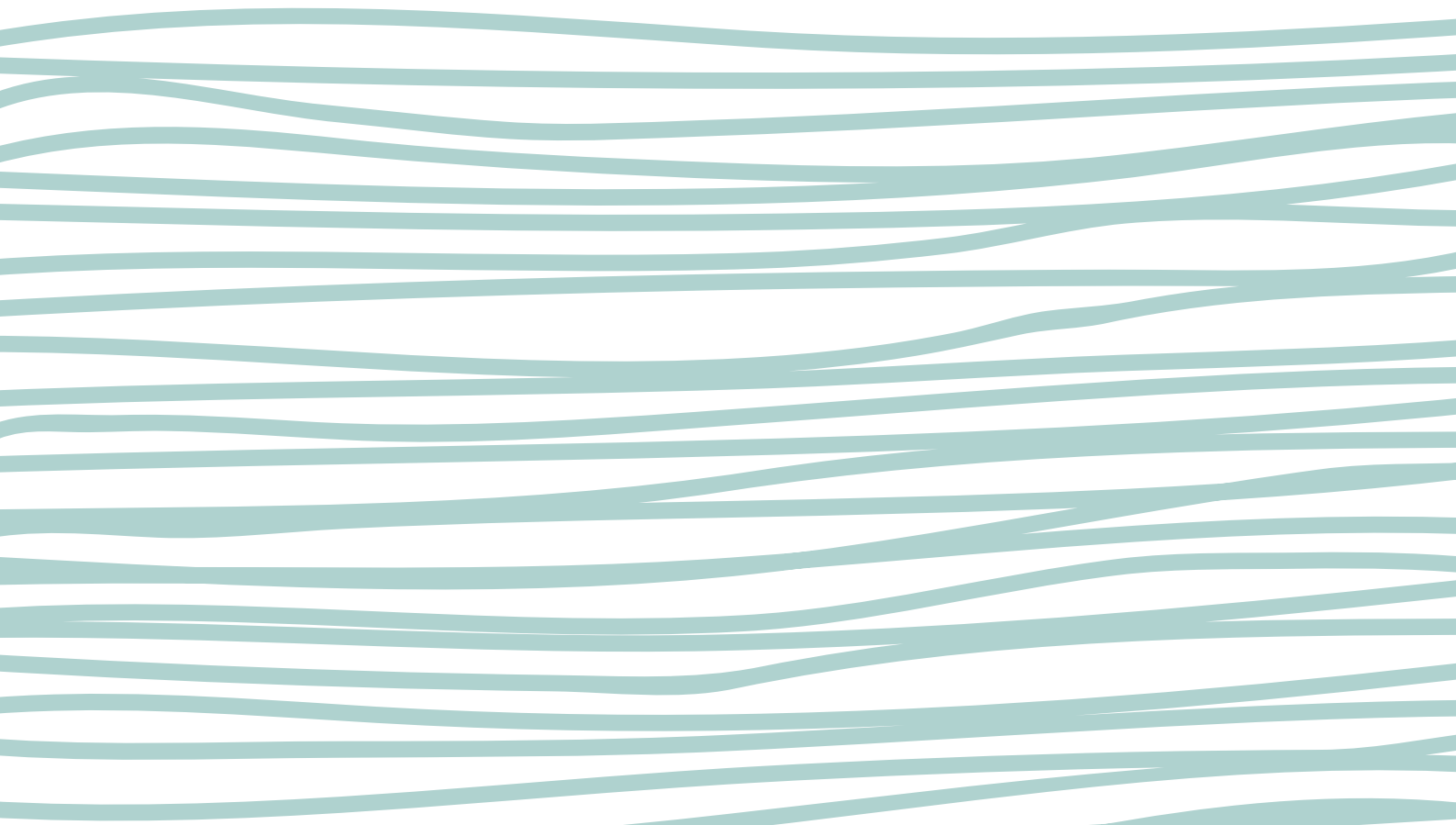
Importantly, in addition to the individual risks and impacts, and cumulative risks and impacts, the 'Precautionary Principle' must be applied in environmental planning decision-making and conservation of biological diversity and ecological integrity, should be a fundamental consideration. The 'Precautionary Principle' requires decision-making to give the environment the benefit of the doubt.

In line with all points of objection outlined in our two submissions, Animal Liberation respectfully requests the relevant decision makers refuse consent for the proposed development as described in DA NO 2021/129.



SECTION SIX

REFERENCES



SECTION SIX

REFERENCES

In addition to the extensive seven (7) pages of source and reference material reviewed and referenced in our 23 November 2021 submission, Animal Liberation has sourced and referenced the following additional material in preparation and compilation of this amended DA.

Applicant Documents

DA 2021-129 Cover Letter for Updated Statement of Environmental Effects and Response to Submissions

DA 2021-129 Response to Submissions - Appendix A GYDE Part 1

DA 2021-129 Response to Submissions - Appendix B GYDE Part 1

DA 2021-129 Response to Submissions - Appendix C Floor Plan of existing cottages

DA 2021-129 Response to Submissions - Appendix D Drought Security Strategy Larry Cook

DA 2021-129 Response to Submissions - Appendix E Drought Strategy Warren Smith Consulting Engineers

DA 2021-129 Response to Submissions - Appendix F Greyhound Turnover Information

DA 2021-129 Response to Submissions - FINAL

DA 2021-129 Response to Submissions - with Appendices

DA 2021-129 SEE - Appendix 13(b) Greater Blue Mountains World Heritage Area Strategic Plan Assessment

DA 2021-129 Statement of Environmental Effects - Appendix 3 Architectural Plans (1)

DA 2021-129 Statement of Environmental Effects - Appendix 5 DA Utility Report

DA 2021-129 Statement of Environmental Effects - Appendix 6 Wastewater Management Plan

DA 2021-129 Statement of Environmental Effects - Appendix 7 Operational Plan

DA 2021-129 Statement of Environmental Effects - Appendix 8 Cost Report

DA 2021-129 Statement of Environmental Effects - Appendix 9(a) Ecological Advice

DA 2021-129 Statement of Environmental Effects - Appendix 9(b) Supplementary Ecological Advice

DA 2021-129 Statement of Environmental Effects - Appendix 10 DCP Compliance Table

DA 2021-129 Statement of Environmental Effects - Appendix 11 Updated Design Statement

DA 2021-129 Statement of Environmental Effects - Appendix 12 Visual Impact Photomontage Package

DA 2021-129 Statement of Environmental Effects - Appendix 13(a) National Parks and Wildlife Service Lands Assessment

DA 2021-129 Statement of Environmental Effects - Appendix 14 Updated Landscape Plan

DA 2021-129 Statement of Environmental Effects - Appendix 15(a) Odour Assessment

DA 2021-129 Statement of Environmental Effects - Appendix 15(b) Odour Addendum

DA 2021-129 Statement of Environmental Effects - Appendix 16(a) Acoustic Report

DA 2021-129 Statement of Environmental Effects - Appendix 16(b) Updated Acoustic Report

DA 2021-129 Statement of Environmental Effects - Appendix 17 Biogas Report

DA 2021-129 Statement of Environmental Effects - Appendix 18(a) Traffic Impact Assessment

DA 2021-129 Statement of Environmental Effects - Appendix 18(b) Response to Traffic RFI and Survey detail

DA 2021-129 Statement of Environmental Effects - Appendix 19 Waste Management Plan

DA 2021-129 Statement of Environmental Effects - Appendix 20 Bushfire Report

DA 2021-129 Statement of Environmental Effects - Appendix 21(a) Flood Impact Assessment

DA 2021-129 Statement of Environmental Effects - Appendix 21(b) Flood Risk Assessment

DA 2021-129 Statement of Environmental Effects

GRNSW & GWIC DOCUMENTS

GWIC's online Final Disciplinary decisions, <https://www.gwic.nsw.gov.au/integrity/disciplinary-decisions>

OTHER

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CONTACT US

Postal Address: Suite 378 | 846-850 Military Rd,
MOSMAN NSW 2088

ABN: 66 002228 328

Email: lisa.r@animal-lib.org.au

Web: www.al.org.au

Phone: (02) 9262 3221

Lisa J Ryan, Regional campaign manager
Alex Vince, Campaign director
Nadia Kiternas, Digital & social media strategist

