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31 October 2011

Dear Murray

Royal Randwick Racecourse
Spectator Precinct - DGR Report - Spectator Precinct Odour Management Plan-
Issue 3

As part of the Spectator Precinct 75w planning process Arup have been asked to review the current architectural documents listed below and advise the impacts to the recommendations made within the above DGR report.

The buildings form essentially remains the same although it has shortened a little.

Title	Number	Rev
Existing Roof Plan	DA-05	B
Proposed Roof Plan	DA-06	B
Proposed Site Plan	DA-07	B
Proposed Site Elevations	DA-08	B
Previous DOP Scheme Overlay	DA-09	B
Grandstand Basement 1	DA-10	B
Grandstand Ground	DA-11	B
Grandstand Level 1	DA-12	B
Grandstand Level 2	DA-13	B
Grandstand Level 3	DA-14	B
Grandstand Level 4	DA-15	B
Grandstand Level 5	DA-16	B
Grandstand Level 6	DA-17	B
Grandstand Level Plant	DA-18	B
Grandstand Level Roof	DA-19	B
QEII Section A-A (Existing)	DA-20	B
QEII Section A-A (Demolition)	DA-21	B
QEII Section A-A (Proposed)	DA-22	B
Paddock Sect B-B & Link Sect C-C	DA-23	B
Elevation NW-SE	DA-24	B

Elevation SW-NE	DA-25	B
Parade Ring Ground	DA-30	B
Parade Ring Level 1	DA-31	B
Section A-A & B-B	DA-32	B
Section C-C & D-D & E-E	DA-33	B
View Analysis – V2	DA-52	B
View Analysis – V3	DA-53	B
View Analysis – V4	DA-54	B
View Analysis – V6	DA-56	B
View Analysis – V7	DA-57	B
View Analysis – V8	DA-58	B
Cut & Fill Plan	DA-60	B

Having reviewed the above documents we confirm that the new building configuration does not alter the recommendations made within the original DGR report and no amendments are required to the report.

Yours sincerely



Stuart Hood
Engineer

Australian Jockey Club
Spectator Precinct
Environmental and Residential
Amenity, Odour Management Plan

ISSUE 3 | September 2010

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This report takes into account the particular instructions and requirements of our client.


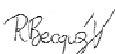

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 220759

ARUP

Document Verification

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1 Executive Summary

This report has been produced in response to the Director Generals Part 3A Planning requirements MP 10-0097 for the construction of the new Spectator Precinct on the northern side of the Royal Randwick Racecourse.

It addresses DGR 6 of the *Project Application for the refurbishment of the Spectator Facility (App N^o MP_100097)* in regards to odour;

- DGR 6. Environmental and Residential Amenity

The EA must address any likely solar access, acoustic privacy, visual privacy, view loss, odour issues and light spill and identify mitigation measures necessary to achieve a high level of environmental and nearby residential amenity including the future development of 66A Doncaster Avenue (the former Tramways Land)

- Appendix B Plans and Documents to accompany the Application

19. Odour Assessment and Odour Management Plan

Odour Assessment and Odour Management Plan – prepared by a suitable professional person/body in accordance with DECCW guidelines identifying all odour sources associated with the proposed development and addressing the collection, storage and disposal of manure and include details of odour control and management practices.

An Odour Assessment and Odour Management Plan will be provided in accordance with DECCW guidelines identifying all odour sources associated with the proposed development and addressing the collection, storage and disposal of manure and include details of odour control and management practices.

It is noted that the DGRs do not include any specific requirement for odour assessment. It is proposed that the assessment is limited to a Level 1 odour impact assessment under the *DECCW Technical Framework and Technical Notes for the Assessment and Management of Odour from Stationary Sources in NSW*.

Dust issues are not expected to be significant from the development in operation and not mentioned in DGR 6. However, reference to dust and appropriate mitigation measures have been included in this Odour Management Plan.

Waste management currently undertaken on the site is assumed to be in accordance with the *AJC Waste Management Plan and Recycling Implantation* (Assetlink 2008) unless otherwise noted.


In conclusion the Odour and Dust analysis undertaken concludes that the proposed refurbishment of the Spectator Precinct is assessed as being acceptable subject to the following recommendations. The precinct has functioned in its current form with no complaints. The waste and therefore potential odour generation from the site is expected to be increased over the existing condition.

This Odour Management Plan meets the requirements of DGR 6 in response to odour and dust.

Recommendations for the refurbishment of the Spectator Precinct in regards to odour and dust are:

- An odour complaints management system is to be maintained for the Royal Randwick Racecourse during operation to meet the requirements of Section 11 of the DECCW *Technical Notes: Assessment and management of odour from stationary sources in NSW (DECC 2006)*. The management system should include:
 - a hotline for receiving complaints about the activity;
 - a system for recording complaints and dealing with them (e.g. complaints register);
 - records of complaints and operator's responses or actions, readily accessible to the community and regulatory authorities; and
 - an ability to provide feedback to the community where required (for example, a newsletter or meetings with affected residences).
- Maintaining and expanding upon the existing vegetative buffer surrounding the site, particularly along the site boundary with 66A Doncaster Avenue. Any removal of vegetation should be offset with new plantings where possible;
- Any manure waste collected to be kept in enclosed bins and/or an enclosed area prior to removal;
- The waste bin storage area for up to 600 bins on the boundary of Doncaster Avenue has potential as an odour source if bins are not kept clean. No storage of waste in this area outside of during a race day should occur.
- Waste to be handled, stored and removed from site in accordance with the Waste Management Plan;
- If for whatever reason waste is not removed from site on the day of an event, waste is to be housed in an enclosed area away from nearby residences so as to reduce potential for odour emissions.

The following recommendations are made in regards to dust:

- Access roads used by vehicles and horses are to be kept clean;
 - In relation to potential impact throughout the period of construction, a construction management plan will be prepared to manage and mitigate any potential air quality impact.
- 

2 Introduction

A refurbishment of the Spectator Precinct at the Royal Randwick Racecourse is proposed. This proposal requires an Odour Assessment and Odour Management Plan to be completed in accordance with the *DECCW Technical Framework and Technical Notes for the Assessment and Management of Odour from Stationary Sources in NSW* (the guidelines) identifying all odour sources associated with the proposed development and addressing the collection, storage and disposal of waste including details of odour control and management practices.

2.1 Project Description

The redevelopment of the existing Spectator Precinct will see the existing Queen Elizabeth II (QE2) grandstand refurbished and the Paddock Grandstand replaced with a new grandstand, including basement levels, and a new Parade Ring added (Theatre of the Horse) as well as spectator amenities such as Kiosks and landscaped areas.

The site overlay below shows the Spectator Precinct's location on site near the intersection of Alison road and Doncaster Avenue, as well as a concept design of the Spectator Precinct.

Figure 1 Location of Spectator Precinct

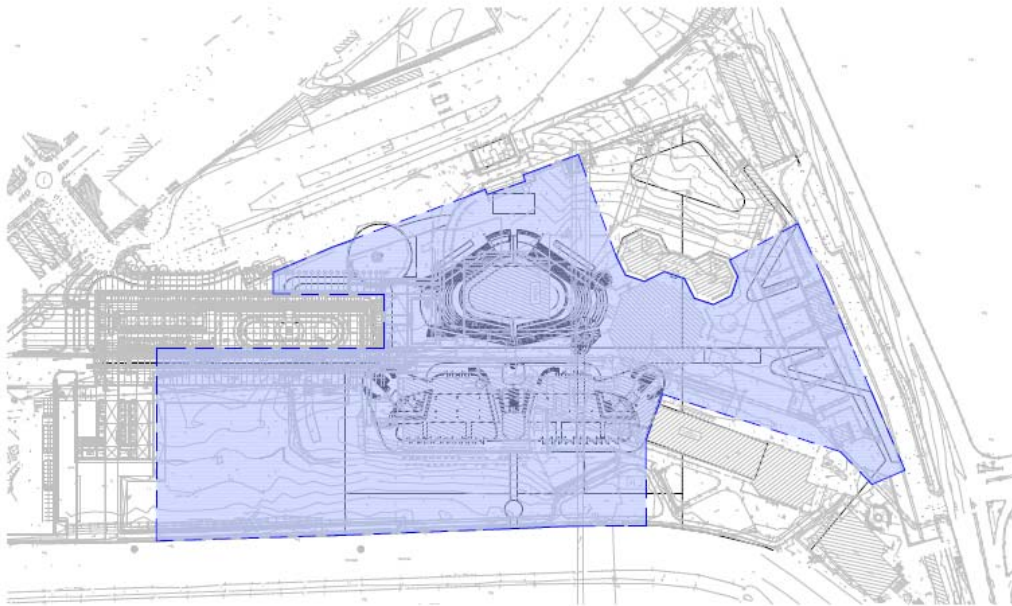
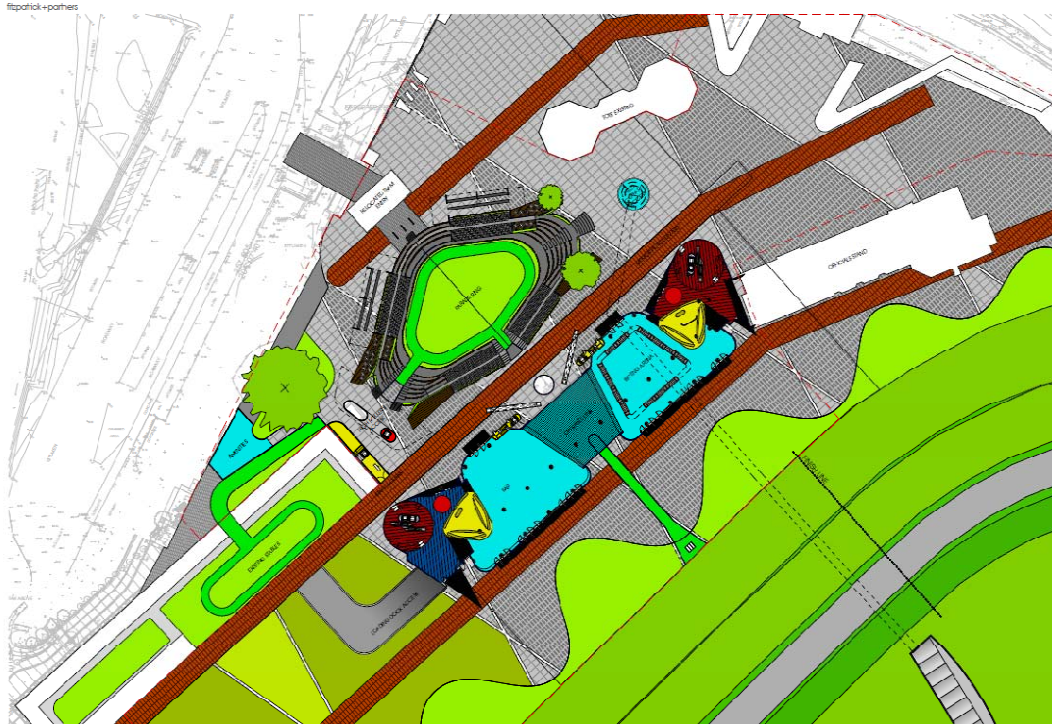


Figure 2 Spectator Precinct Concept Design



2.2 Existing Condition – Odour and dust

The Royal Randwick Racecourse hosted 63 race days in the 2009/2010 financial year with major racing events taking place only a few times a year. There have been no odour complaints associated with the function of the precinct to date.

Odour generation from the site is primarily from the generation, storage and transportation of waste. Waste management currently undertaken on the site is assumed to be in accordance with the *AJC Waste Management Plan and Recycling Implantation* (Assetlink 2008) unless otherwise noted.

The current Spectator Precinct generates considerable volumes of waste on major events days, in the order of 20 tonnes. Much of this waste is recyclable in the form of glass bottles. Two glass crushers are used for race days and business events to reduce the disposable volume of empty bottles by 80%.

Waste is currently collected separately by means of different coloured bins for cardboard, glass and general waste. There is no composting or organic waste collection or treatment onsite. Cardboard is bailed onsite by means of an electric bailer to facilitate recycling.

Current waste collection and off-site disposal methods at the Royal Randwick Racecourse result in an on average 70 to 80% diversion of waste from landfill, based on weight. This is achieved through sending the majority of waste off to Visy's Material Recovery Facility (MRF) at Smithfield. Minimal odour impact to neighbouring land uses currently occurs due to this same day removal of waste from the site on race days.

There are currently 500 to 600 mobile garbage bins (240L) on site to accommodate peak load on the busiest race days (occurring a few times a year).

Current race day arrangement is for two mobile compactors parked on site that have a processing capacity of 10 tonnes a day each. On Autumn and Spring Carnival Race Days an additional twelve mobile skip bins of three cubic metres are positioned on course, holding an estimated 1.5 tonnes of glass waste per Carnival day.

There are currently up to 220 staff on the busiest race days solely for managing waste.

Dust generation from the Spectator Precinct is currently low due to the heavily landscaped nature of the site (much of this impervious) and from large areas of the site being covered by structures such as the QEII and Paddock Grandstands. Dust from unsealed parking lots and foot traffic over grassed and unsealed areas are the main potential sources on the site at present. The new development will reduce the potential for dust generation.

2.3 Proposed Modification – Odour and dust

Odour impact is assumed to be solely from the generation, storage and transport of wastes on site.

The peak waste load that is experienced during major race days will increase due to the refurbishment of the Spectator Precinct, with increases to capacity of the QE2 stand and the Paddock stand, and the addition of the Parade Ring called ‘Theatre of the Horse’.

The refurbishment will result in a combined 69% seating capacity increase for the QE2 and Paddock stands, and an additional 5000 seating capacity at the Theatre of the Horse. Total seating capacity at Randwick will increase by 81% or 7525 seats (see Figure 3¹).

Figure 3 Capacity of proposed refurbishment of the Spectator Precinct

Grandstand	Current Capacity	Proposed Capacity	Percentage Change
Queen Elizabeth II	3,744	4,980	33%
Paddock	3,077	6,534	112%
Tea House	888	-	(100)%
Theatre of the Horse	-	5,000	500%
Pavilion	1,600	320	(80)%
Total	9,309	16,834	81%

As such additional waste storage will need to be provided over the existing condition, and a redesign of current waste handling procedures is sought. Increased recyclables recovery and the potential for the capture of some of the organics waste stream from vendors are to be investigated.

¹ Urbis July 2010. Clause 6 Request and Preliminary Environmental Assessment – Royal Randwick Racecourse Spectator Precinct

Additional waste storage will need to be accommodated on site and this will be through a combination of permanent on-site bin locations, dedicated storage areas within the spectator precinct and dedicated storage areas outside of the spectator precinct from which the bins can be transported to the precinct as required for large events. Odour will be managed through effective waste management procedures and the design of waste facilities to relevant building standards.

Dust generation from the site (in operation) will be reduced over the existing condition.

3 Statutory Requirements

Environmental Planning and Assessment Act 1979

The project is subject to Part 3A planning requirements under the Environmental Planning and Assessment Act 1979.

This report has been produced in response to the Director Generals Part 3a Planning requirements MP 10-0097 for the construction of the new Spectator Precinct on the northern side of the Royal Randwick Racecourse.

It addresses DGR 6 of the *Project Application for the refurbishment of the Spectator Facility (App N^o MP_100097)* in regards to odour;

- DGR 6. Environmental and Residential Amenity

The EA must address any likely solar access, acoustic privacy, visual privacy, view loss, odour issues and light spill and identify mitigation measures necessary to achieve a high level of environmental and nearby residential amenity including the future development of 66A Doncaster Avenue (the former Tramways Land)

- Appendix B Plans and Documents to accompany the Application

18. Odour Assessment and Odour Management Plan

Odour Assessment and Odour Management Plan – prepared by a suitable professional person/body in accordance with DECCW guidelines identifying all odour sources associated with the proposed development and addressing the collection, storage and disposal of manure and include details of odour control and management practices.

The Protection of the Environment Operations Act, 1997

The POEO Act allows for licensed activities to be required to meet conditions designed to prevent or minimise odour. The legislation includes the concept of ‘offensive odour’ and it is an offence for scheduled activities to emit ‘offensive odour’. Although the Spectator Precinct does not require a licence under the act, the conditions of approval require that the facility does not emit an offensive odour as defined by the POEO Act. The facility will be required to comply with this condition, but it will be enforced by the Department of Planning (DoP) rather than DECCW who enforce licensed premises only.

Offensive odour is defined under the POEO Act as:

“an odour:

- a) *that, by reason of its strength, nature, duration, character or quality, or the time at which it is emitted, or any other circumstances:*
 - i) *harmful to (or is likely to be harmful to) a person who is outside the premises from which it is emitted, or*
 - ii) *interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted, or*
- b) *that is of a strength, nature, duration, character or quality prescribed by the regulations or that is emitted at a time, or in other circumstances, prescribed by the regulations.”*

In addition, it is an offence for any person to undertake an activity in such a manner as to cause air pollution, which includes odour.

3.1 DECCW Technical Framework - Assessment and Management of Odour from Stationary Sources in NSW

The NSW DECCW *Technical Framework - Assessment and Management of Odour from Stationary Sources in NSW 2006* provides a policy framework for assessing and managing activities that emit odour and offers guidance on dealing with odour issues to industry, consent authorities, planners, environmental regulators and odour specialists.

The technical notes associated with the framework have been used to complete this Odour Management Plan for the Spectator Precinct.

3.2 Royal Randwick Racecourse Development Control Plan 2007

The Royal Randwick Racecourse Development Control Plan (DCP) is applicable to the area to be covered by this Odour Management Plan.

The Royal Randwick Racecourse DCP contains planning provisions for traffic management, precinct specific uses and development within the Royal Randwick Racecourse.

The applicable section of the DCP in regards to waste and odour is provided in Part 3.7 of this DCP;

Environmental Sustainability

Performance Criteria (a):

(iv) Clean and efficient operational practices that:

- *ensure waste minimisation and recycling*
- *provide space for the separation and recycling of wastes*

- *provide synergies with neighbouring uses in terms of products and waste.*

The DCP calls for the general pattern of land use to be maintained across the site. The site of the refurbished Spectator Precinct is wholly located in the area described as ‘Spectator Precinct’ in the DCP, which is reserved for ‘concentration of race day, AJC management and entertainment uses.’

3.3 Randwick City Council Waste Management Guideline for Proposed Developments

The Spectator Precinct is located within the Randwick City Council local government area (LGA), and the applicable waste planning document for new developments in this local government area is the Randwick City Council Waste Management Guideline for Proposed Developments.

Detailed design of waste facilities included within the refurbishment of the Spectator Precinct will be informed by the requirements for waste handling, waste collection and access requirements included within the Appendices of the Randwick City Council Waste Management Guideline for Proposed Developments.

4 Odour Assessment

An odour assessment has been undertaken for the proposed refurbishment of the Spectator Precinct on the Royal Randwick site.

The Spectator Precinct is assessed as being a ‘diffuse source’ of odour. The guidance of the DECCW technical framework² has been taken in completing this assessment, with calculation of odour using a Level 1 odour assessment for a diffuse source not applicable. Applicable requirements of an odour assessment as described by the guidelines are covered in this screening assessment and includes;

- Potential odour sources;
- Location of emission sources;
- Operating hours and times when intermittent odour-generating activities are likely to occur;
- All nearby receptors potentially affected by odour generating activities;
- Weather conditions (prevailing winds, inversions and katabatic drift);
- Site features (topography, vegetation, built form and surrounding land uses);
- Likely odour impacts;
- Mitigation measures;
- Mitigation measures available if surrounding land use changes.

² DECCW 2008. Assessment and management of odour from stationary sources in NSW Technical Framework

4.1 Potential odour sources

Potential odour sources from the proposal are from waste generation, waste storage and waste transportation on the site, particularly for large events.

Waste Generation

As an example of current waste generation, the waste collected from the site during the month of April 2010 amounted to 122.1 tonnes. A waste breakdown for April is provided in the table below:

Table 1 Current waste composition Royal Randwick Racecourse (April 2010)

2009-2010	Tonnes	% of Total
Gen Waste 240L	31.72	26.0%
Gen Waste 660L	8.82	7.2%
Cardboard 660L	3.36	2.8%
Cardboard 1100L	0.32	0.3%
Stables	25.08	20.5%
Comingle	0	0.0%
General race meetings	52.14	42.7%
Bottle Cycler Glass	0.66	0.5%
Total	122.1	100%

About 43% of the waste generated in April came from “general race meetings”, which consisted of the Autumn Racing Carnival held on

- April 10 (Derby Day)
- April 17 (Doncaster Day), and
- April 24 (Sydney Cup Day)

Over the course of these three racing days a total of 67,032 spectators visited Randwick, generating 52 tonnes of waste or an average 1.29 kg of waste per capita. The estimated waste peak load for Doncaster Day was just over 20 tonnes of general waste.

The peak waste load that is experienced during major race days will increase due to the refurbishment of the Spectator Precinct, with increases to capacity of the QE2 stand and the Paddock stand, and the addition of the Parade Ring called ‘Theatre of the Horse’ (see Figure 3).

The refurbishment will result in a 33% capacity increase for the Queen Elizabeth 2 grandstand, 112% increase for the Paddock grandstand, and an additional 4500 seating capacity at the Theatre of the Horse.

Waste generation will increase in line with these patronage increases (in the case of no additional waste minimisation or diversion measures put in place) to approximately 36 tonnes of general waste on a large race day.

Waste Storage

As such additional waste storage will need to be provided over the existing condition, and a redesign of current waste handling procedures is sought.

Increased recyclables recovery and the potential for the capture of some of the organics waste stream from vendors are to be investigated.

Additional waste storage will need to be accommodated on site and this will be through a combination of permanent on-site bin locations, dedicated storage areas within the spectator precinct and dedicated storage areas outside of the spectator precinct from which the bins can be transported to the precinct as required for large events.

Storage of bins outside of grandstand areas has the greatest potential for odour impacts. The bin storage area for up to 600 bins on the site boundary adjacent to Doncaster Avenue has potential as an odour source if bins are not kept empty and clean. No storage of waste in this area outside of during a race day is proposed.

A waste management strategy for the proposed Spectator Precinct is provided in the Waste Management Plan for the project as part of the response to DGR 6 of the Project Application.

Waste Transportation

Waste transportation from the site is to occur by waste trucks entering and exiting through the Doncaster Avenue access. Odour impacts to residences on Doncaster Avenue are possible from transportation of waste in this area. There have been no complaints in regards to odour from waste transportation to date.

4.2 Potential odour emissions

A Level 2 or Level 3 odour assessment under the DECCW technical framework (including odour sampling and modelling of air quality and odour dispersion) has not been undertaken as the potential increase in odour emissions from the site is expected to be insignificant. No change in land use is proposed for the site and odour impact is expected to be suitably addressed by incorporating the waste management and odour mitigation measures in Section 5.

4.2.1 Local topography

The local topography of the area is predominantly flat and does not assist in minimising odour impacts.

The built form of the site can have an effect on odour pathways and the level of impact. No significant built form is proposed on the site boundary with 66A and as such there is no potential shielding effect from the built form. The installation of a screen of another form (such as stands of trees and shrubs) on the Spectator Precinct boundary would be beneficial and is discussed in Section 6.

4.2.2 Weather conditions

The prevailing wind directions for the site have been inferred from Bureau of Meteorology yearly data for the nearest applicable weather station (Sydney Airport) see Figure 5.

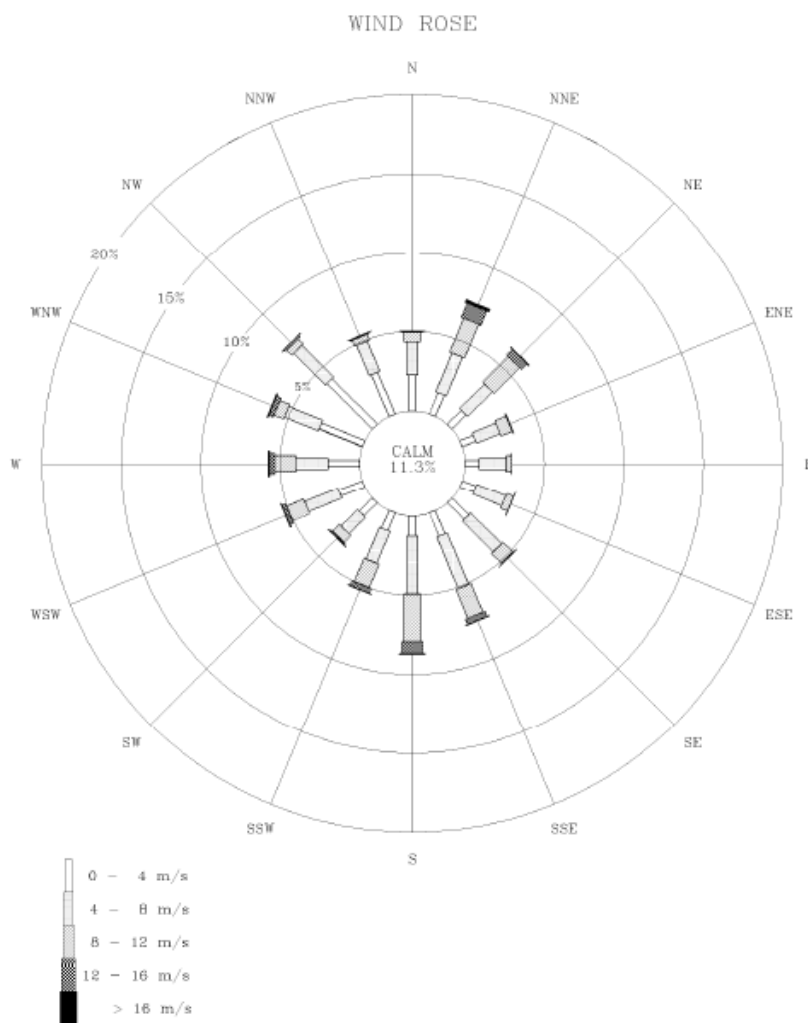
The prevailing wind conditions for the site from Figure 2 indicate that wind frequency and direction from the north, north east and from the south are the most

frequent. A southerly wind direction has a tendency to disperse odour away from the 66A Doncaster Avenue site, which is deemed advantageous.

Whilst winds from the north- north east may direct odour dispersion from the site towards residential areas on Doncaster Avenue, this is not considered to be significant considering the Spectator Precinct is remote from this residential area.

No wind direction is deemed to be dominant for the area and wind direction is assessed to be a minor consideration as a result of this odour assessment.

Figure 4 Prevailing wind conditions



Sydney International Airport (#947670)
1986-2007: Anemometer corrected to 10 m Open Country
Source: NCDC EarthInfo

4.2.3 Cumulative Impacts

Cumulative impacts from the new development are deemed insignificant. The surrounding land use of Doncaster Avenue is residential with varying density, with no identified potential odour sources. Land use along Alison Road adjacent to the Spectator Precinct is open space and parklands managed by Centennial Parklands and is unlikely to change in land use in the future. Air quality impacts are generated from the existing road network, with the road network unaltered by the proposal. Any odour impact from the refurbished Spectator Precinct will replace an existing odour impact from the current facility, and will not be an additional source.

5 Dust emissions

5.1 Potential dust sources

Potential dust generation activities from the proposal include:

- Unsealed areas such as tree pits and flower beds;
- The cleaning of Spectator facilities (concrete areas, grandstands and Theatre of the Horse).

5.2 Potential dust generation

Potential dust generation from the proposal is likely to be minimal due to the heavily developed nature of the site with few unsealed areas capable of generating dust. The Preliminary Environmental Assessment³ for the project states that ‘No issue of air quality impact due to odour and dust is expected to arise where the proposed use is generally consistent with that existing’.

Dust generation from the refurbishment of the Spectator Precinct may occur from the following;

- Removal and handling of horse manures in the precinct (predominantly from the Theatre of the Horse)
- Changes to landscaping of open spaces.

The Theatre of the Horse will be constructed with an artificial rubberised surface and is therefore not assessed as a significant potential dust source.

In general unsealed surfaces will be reduced by the refurbishment of the Spectator Precinct and dust generation is not expected to be significant.

Management measures suggested for dust are included within Section 6.

³ Urbis July 2010. Clause 6 Request and Preliminary Environmental Assessment – Royal Randwick Racecourse Spectator Precinct (Section 7.7.2)

6 Management measures – Odour and dust

There is potential for impacts as the odour assessment indicates the Spectator Precinct will be within the recommended distance from nearby residences. No odour limits are applied as a result this odour assessment, however best practice odour mitigation measures are suggested.

Mitigation measures for odour to be applied on the site are to include;

- An odour complaints management system is to be maintained for the Royal Randwick Racecourse during operation to meet the requirements of Section 11 of the DECCW *Technical Notes: Assessment and management of odour from stationary sources in NSW (DECC 2006)*. The management system should include:
 - a hotline for receiving complaints about the activity;
 - a system for recording complaints and dealing with them (e.g. complaints register);
 - records of complaints and operator's responses or actions, readily accessible to the community and regulatory authorities; and
 - an ability to provide feedback to the community where required (for example, a newsletter or meetings with affected residences).
- Maintaining and expanding upon the existing vegetative buffer surrounding the site, particularly along the site boundary with 66A Doncaster Avenue. Any removal of vegetation should be offset with new plantings where possible;
- Any manure waste collected to be kept in enclosed bins and/or an enclosed area prior to removal;
- The bin storage area for up to 600 bins on the boundary of Doncaster Avenue has potential as an odour source if bins are not kept clean. No storage of waste in this area outside of during a race day should occur.
- Waste to be handled, stored and removed from site in accordance with the Waste Management Plan;
- If for whatever reason waste is not removed from site on the day of an event, waste is to be housed in an enclosed area away from nearby residences so as to reduce potential for odour emissions.

The following mitigation measures are to be adopted for management of emission of dust from the Spectator Precinct:

- Access roads used by vehicles and horses are to be kept clean;
- In relation to potential impact throughout the period of construction, a construction management plan will be prepared to manage and mitigate any potential air quality impact.

7 Recommendations

Recommendations for the refurbishment of the Spectator Precinct in regards to odour and dust are:

- An odour complaints management system is to be maintained for the Royal Randwick Racecourse during operation to meet the requirements of Section 11 of the DECCW *Technical Notes: Assessment and management of odour from stationary sources in NSW (DECC 2006)*. The management system should include:
 - a hotline for receiving complaints about the activity;
 - a system for recording complaints and dealing with them (e.g. complaints register);
 - records of complaints and operator's responses or actions, readily accessible to the community and regulatory authorities; and
 - an ability to provide feedback to the community where required (for example, a newsletter or meetings with affected residences).
- Maintaining and expanding upon the existing vegetative buffer surrounding the site, particularly along the boundary of Doncaster Avenue. Any removal of vegetation should be offset with new plantings where possible;
- Any manure waste collected to be kept in enclosed bins and/or an enclosed area prior to removal;
- The bin storage area for up to 600 bins on the boundary of Doncaster Avenue has potential as an odour source if bins are not kept clean. No storage of waste in this area outside of during a race day should occur.
- Waste to be handled, stored and removed from site in accordance with the Waste Management Plan;
- If for whatever reason waste is not removed from site on the day of an event, waste is to be housed in an enclosed area away from nearby residences so as to reduce potential for odour emissions.

The following recommendations are made in regards to dust:

- Access roads used by vehicles and horses are to be kept clean;
- In relation to potential impact throughout the period of construction, a construction management plan will be prepared to manage and mitigate any potential air quality impact.

8 Conclusion

The odour and dust impacts from the proposed refurbishment of the Spectator Precinct are assessed to be acceptable where the recommendations in Section 7 are implemented on the site. The waste and therefore potential odour generation from the site is expected to be increased over the existing condition.

This Odour Management Plan meets the requirements of DGR 6 in response to odour and dust.