

**MAJOR PROJECT ASSESSMENT:
CONSTRUCTION OF NEW STABLE
FACILITY AT ROYAL RANDWICK
RACECOURSE
*Proposed by AJC (MP 10_0098)***

Director-General's
Environmental Assessment Report
Section 75I of the
Environmental Planning and Assessment Act 1979

December 2010



ABBREVIATIONS

CIV	Capital Investment Value
CMP	Conservation Management Plan
Department	Department of Planning
DGRs	Director-General's Requirements
DITRDLG	Department of Infrastructure, Transport, Regional Development and Local Government
Director-General	Director-General of the Department of Planning
EA	Environmental Assessment
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPI	Environmental Planning Instrument
MD SEPP	State Environmental Planning Policy (Major Development) 2005
Minister	Minister for Planning
PAC	Planning Assessment Commission
Part 3A	Part 3A of the <i>Environmental Planning and Assessment Act 1979</i>
PEA	Preliminary Environmental Assessment
PFM	Planning Focus Meeting
PPR	Preferred Project Report
Proponent	Australian Jockey Club
RTA	Roads and Traffic Authority
RtS	Response to Submissions
SACL	Sydney Airport Corporation Limited
RRR	Royal Randwick Racecourse

Cover Photograph: View of the proposed building.

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EXECUTIVE SUMMARY

This is a report on a project application seeking approval for the construction of a new stables facility at the Royal Randwick Racecourse (RRR), on the corner of Alison and Wansey Roads. The RRR is located primarily on Alison Road, Randwick, with frontages also to Wansey Road, Doncaster Avenue, High Street and Anzac Parade, in the Randwick Local Government Area, and approximately 5 kilometres from the Sydney CBD. The proponent is the Australian Jockey Club (AJC).

The scope of the proposed stables redevelopment includes:

- Six two-storey stable buildings, each housing 100 horses, sand rolls, wash-bays and accommodation for 10 strappers / stable-hands.
- 12 two-storey mechanical horse walkers (24 machines in total).
- Tie-up Stalls for 50 visiting horses for Barrier Trials.
- Pony Enclosure for 20 to 25 ponies.
- Exercising facilities including a 'Bull Ring', Parade Rings, and Equine Pool.
- Parking for some 110 vehicles, comprising 80 permanent and 30 over-flow parking spaces.
- Modifications to the existing vehicle access from Wansey Road, relocating it further north of the existing Wansey Road access.

The Capital Investment Value (CIV) of the proposal is \$37.6 million.

On 25 January 2010, the Director-General, as delegate of the Minister, formed an opinion that the proposed development is a major project under Clause 19 of Schedule 1 of the *State Environmental Planning Policy (Major Development) 2005*. The Minister is the approval authority. However, the Director-General has delegated his planning assessment functions in respect of the project to Randwick City Council as contained in an Instrument of Delegation dated 2 August 2010.

The site is zoned 6A Open Space under Randwick Local Environmental Plan (Consolidation) 1998 and recreation facilities are permissible in the zone.

The proposal was exhibited from 13 October until 12 November 2010. Council received 9 submissions from public authorities and 21 submissions from the local community.

Council has assessed the merits of the project and is satisfied that the impacts of the proposed development have been addressed via the Environmental Assessment, and draft statement of commitments, and can be adequately managed through the recommended conditions of approval.

Council is also satisfied that the site is suitable for the proposed use. The proposal is consistent with strategic planning objectives, including the State Plan, as it would promote the efficient use of sporting and recreational land uses and supporting the ongoing development of a thoroughbred racing facility within NSW. The proposal would also support the growth of the Randwick Education and Health Precinct recognised in the Sydney Metropolitan Strategy and the draft East Subregional Strategy as providing a vital economic and employment role.

Accordingly, Council considers the project is in the public interest and recommends that the project be approved, subject to conditions.

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1. BACKGROUND

1.1 THE SITE

1.1.1 Site Context and Location

The RRR is located primarily on Alison Road, Randwick, with frontages also to Doncaster Avenue, High Street, Anzac Parade and Wansey Road (refer to **Figure 1**). The site is located in the Randwick Local Government Area.



Figure 1 – Locality Plan

The Stable Precinct (shown as the development site in Figure 1) is broadly located at the north-eastern corner of the RRR at the corner of Alison Road and Wansey Road. To the north and east of the subject site are residential properties fronting the opposite sides of Alison Road and Wansey Road respectively. Further to the north along Alison Road is Centennial Park and to the west along Doncaster Ave is a mix one and two storey dwelling houses and residential flat buildings. The land comprising the Stables Precinct is

located at a lower level than Wansey Road and Alison Road and falls away from Wansey Road to the south-west.

Existing within the Stables Precinct are the following uses:

- Six timber framed and two metal framed Stripping Stall buildings and a Farrier's workshop.
- Three sand-rolls, one at the southern end of the stripping stalls, and two roofless at the northern end.
- A 'Bull Ring' with a smaller internal training track.
- Administration Hut and Stewards' Office
- Approximately 69 trees either within or adjacent to the precinct including:
 - 10 Moreton Bay Figs.
 - 12 Hills Weeping Figs.
 - 7 English Plane Trees.
 - Range of local gum trees.
 - Several exotic species.

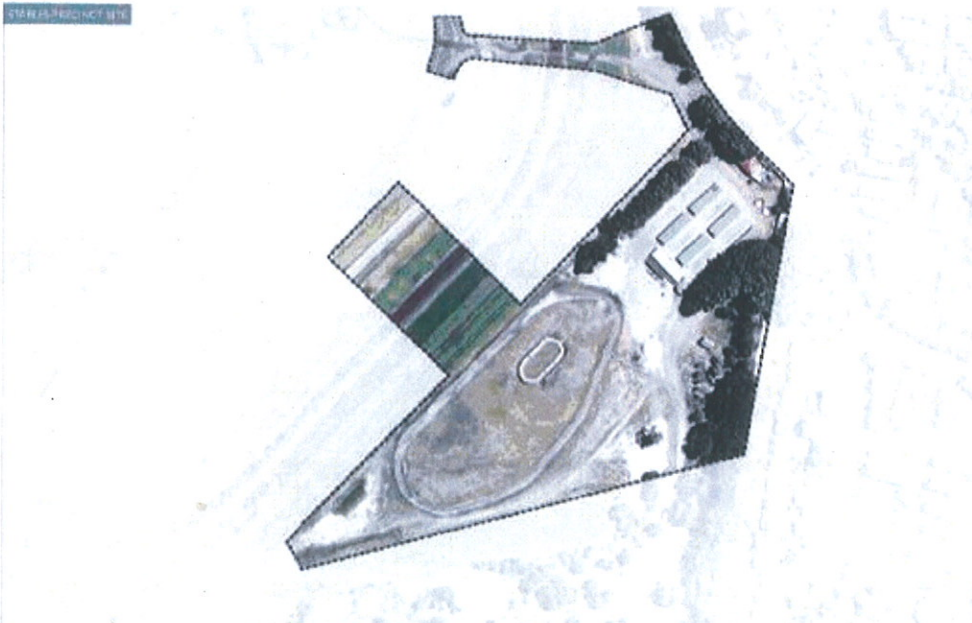


Figure 2: Existing buildings and Structures



Figure 3 – View of the Stables Precinct from the corner of Alison Road and Wansey Road.



Figure 4 – View of the existing residential development along Wansey Road 1.2

2. PROPOSED PROJECT

2.1 Project Description

The proposal seeks approval for the demolition of the existing Stripping Stalls, Sand Rolls, Farrier's Workshop, Administration Hut and Stewards' Office, excavation and site works and construction of 6 x 2 storey stable buildings with ancillary facilities accommodating a total of 600 horses, 12 x 2 storey mechanical horse walkers, tie-up stalls, pony enclosure, open exercising facilities, accommodation rooms for staff, car parking, relocation of the vehicular entrance on Wansey Road and on-site landscape works. The stables would have a maximum height of 12.63m.

Specifically, each stable building will contain two floors each with the following facilities:

- Stables for 50 live-in horses
- Two Sandrolls, utilised by horses prior to washing.
- Four Wash-bays.
- Trainers' Office.
- Feed Store, Storeroom, Tack room and Laundry.
- A single Stable Hand / Caretakers Accommodation Room.

A 'mezzanine' level above part of the second floor stables will provide 8 accommodation rooms for staff (Strappers and Stable-hands) accessed via an external staircase from either of the stable levels, and will comprise 8 single bedrooms, 4 communal bathrooms a communal kitchen and eating area.

Ground floor stables will be at-grade, with access directly from the ground level, while the first floor stables will be accessed from an elevated walkway.

Additionally the proposal includes the construction of the following key features:

Tie-up Stalls

A new Tie-up Stalls Building to accommodate visiting horses which come for Barrier Trials (approximately once per fortnight). The Tie-up Stall Building will be a single storey building, with 50 stalls and two wash-bays. The Tie-up Stalls will service visiting horses to complete in barrier trials. The location of the Tie-up Stall Building is situated centrally within the Stables Precinct, with direct accessibility from the proposed car park. This will minimise distances for visiting horses to travel from their transportation and will limit disturbance of visiting horses on standard stabling operations.

Pony Enclosure Building

A new Pony Enclosure Building is also proposed for pony's that will provide accommodation for 20 to 25 ponies. The Pony Enclosure Building is situated to the west of the Tie-up Stalls Building and within close proximity to the Bull Ring. The building has been designed with perimeter access to each of the pony stalls.

Mechanical Horse-Walkers

Each Stable Building will have two two-storey mechanical horse walkers that will be dedicated and exclusively used by the horses housed within the stable building. The horse walkers will facilitate horse movement safely and efficiently between ground and upper floor.

Exercise Rings

A 'Bull Ring' is proposed in the western portion of the Stables Precinct that provides two horse walking tracks, for exercise and training purposes. The Bull Ring includes a smaller 'Cavaletti Ring' internally for horses to be schooled. Two smaller 'Parade Rings' are proposed between Stable Blocks B and C, and E and F. These rings will provide facilities for exercising and showing horses.

Equine Pool

An equine pool is proposed between Stable Blocks C and D for equine exercise. The pool will operate for horses to enter at the northern end and swim in a single direction to the end.

The principle access to the Stables Precinct will be via Wansey Road through Gate 8 which will be relocated approximately 30 north of the current access point. The new access arrangement has been designed incorporating a bridge structure to achieve appropriate grades entering the Precinct.

On-site parking will be provided for 80 passenger vehicle spaces. An additional 30 overflow parking spaces are proposed for occasional use, to accommodate parking demand for major barrier trials. The overflow parking is proposed on an impervious surface which will be appropriate for parking and landscaping concurrently.

Additionally, 10 horse float spaces and a horse float unloading bay for large and articulated horse floats within a hardstand area. All loading associated with the stables operations will occur on site within the Stables Precinct.



Figure 5 – Photomontage of the proposed building (internal view)

A copy of the Environment Assessment is included at **Appendix A**.

2.2 Project Need and Justification

The proposal will provide extensive upgrade to the existing dilapidated structures to comply with the current standards and will also provide a premium horseracing venue in Sydney that will be able to compete with other world-class racing venues in Australia and around the world.

The proposed redevelopment of RRR attempts to address the changes in the landscape of thoroughbred horseracing around the world and will ensure that the spaces can be adapted to changing technology and patterns of uses as well as being able to integrate new facilities within future stages of work within RRR.

3. STRATEGIC AND STATUTORY CONTEXT

3.1 STRATEGIC CONTEXT

3.1.1 NSW State Plan

The refurbishment of the Spectator Precinct within the RRR is consistent with the relevant objectives of the NSW State Plan to promote the efficient use of sporting and recreational land uses and supporting the ongoing development of a thoroughbred racing facility within NSW.

3.1.2 Metropolitan Plan for Sydney 2036

The Metropolitan Plan for Sydney 2036 is a strategic document that guides the development of the Sydney Metropolitan area towards 2036. The Metropolitan Plan aims to support the continued economic growth and competitiveness of Sydney, and consolidate its standing as a 'global city' as well as being the anchor in the City of Cities Structure.

The Metropolitan Plan sets out an employment target for the Sydney region of 760,000 new jobs by 2036. The Plan provides further detailed targets of 31,000 additional jobs for the Eastern Subregion by 2036. The Plan also sets targets and strategies for tourism planning and investment as well as priorities for infrastructure planning and delivery. The proposal will make a significant contribution to the achievement of a number of the Metropolitan Strategy's targets. In particular, the proposal results in the following:

- Creation of a specialised commercial stabling facility that will strengthen and enhance the function of the Royal Randwick Racecourse primarily as a national and international thoroughbred racing venue in line with the Strategy's objective of making Sydney a major contemporary global tourism destination.
- Provision of high quality stabling facilities that ensures the long term viability of the RRR as a major sporting venue and cultural destination in Sydney thus contributing to the Strategy's objective of making Sydney a major contemporary global tourism and events destination.
- Creation of a large number of new full time jobs in the stabling industry, new construction jobs at construction stage and the protection of existing employment at the racecourse including racing, training and breeding which contributes to the Strategy's objective of strengthening employment in Sydney's overall economy.
- Provision of significant capital investment in replacing and upgrading outdated stabling facility and infrastructure and improving the stabling function of RRR which, in effect, supports the Strategy's objective of protecting and enhancing significant infrastructure in the metropolitan area.

3.1.3 Draft East Subregional Strategy

RRR is identified within the Draft East Subregional Strategy as a 'sports/active park' with stadium facilities. Consolidating and strengthening the Randwick Education and Health Specialised Centre is also one of the key directions of the draft East Subregional Strategy.

The Subregional Strategy also targets the provision of an additional 5,900 jobs for the Randwick LGA, with approximately 2,300 additional workers contained within the Randwick Education and Health Specialised centre. The proposal would contribute to providing these additional jobs.

3.2 STATUTORY CONTEXT

3.2.1 Major Project

On 2 August 2010, the Director-General, as delegate of the Minister for Planning, formed the opinion that the proposal is a major project under Clause 15 of Schedule 1 of the *State Environmental Planning Policy (Major Development) 2005*. The Minister is the approval authority.

On 2 August 2010, the Director-General delegated his planning assessment functions in respect of the project to Randwick City Council as contained in an Instrument of Delegation dated 2 August 2010. Council assumed responsibility for the following tasks:

- Preparation of a "Test of Adequacy" of the Environmental Assessment;
- Public consultation and notification of the Project Application;
- Preparation of the report to the Director General detailing the assessment of the Project Application; and
- Preparation of a draft instrument of approval.

Further, in September 2010, the Minister for Planning delegated his power to the Planning Assessment Commission to determine development application.

3.2.2 Permissibility

The development site and adjoining land is zoned 5 Special Uses under the Randwick Local Environmental Plan 1998 (Consolidation). The proposal is consistent with the relevant objectives of the zone which includes, specifically, allowing development that promotes, or is related to, the use and enjoyment of open space. Recreational facilities are permissible in the zone. An extract of the zoning map is provided below in **Figure 6**.

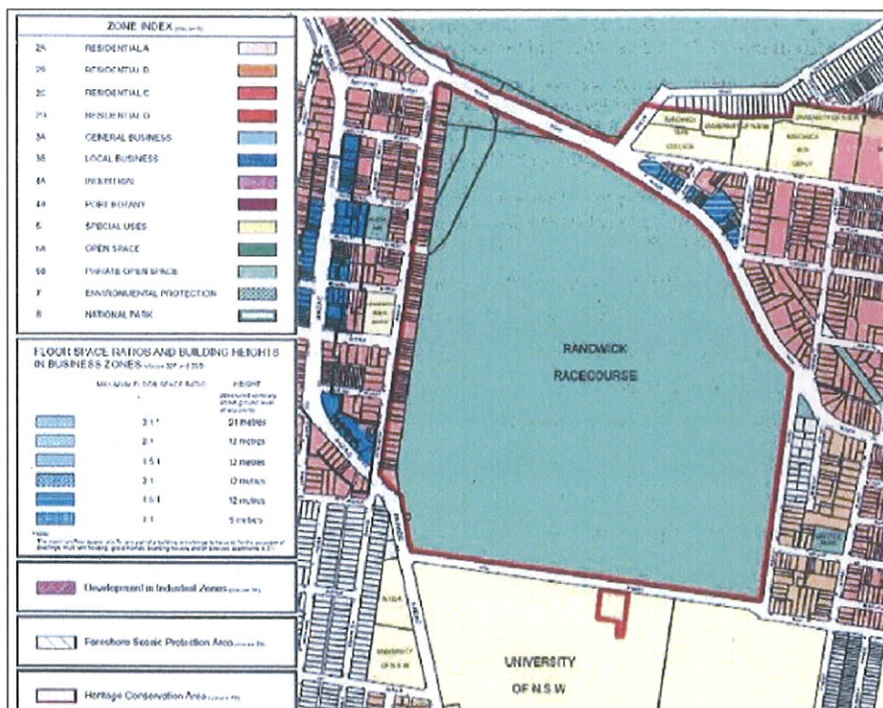


Figure 6 - Zoning Map

3.2.3 Environmental Planning Instruments

Under Sections 75I(2)(d) and 75I(2)(e) of the EP&A Act, the Director-General's report for a project is required to include a copy of, or reference to, the provisions of any State Environmental Planning Policy (SEPP) that substantially governs the carrying out of the project, and the provisions of any environmental planning instruments (EPI) that would (except for the application of Part 3A) substantially govern the carrying out of the project and that have been taken into consideration in the assessment of the project.

Council's consideration of relevant SEPPs and EPIs is provided in **Appendix E** and include:

- State Environmental Planning Policy (Major Development) 2005;
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy No. 55 – Remediation of Land; and
- Randwick Local Environmental Plan 1998 (Consolidation).

3.2.4 Objects of the Environmental Planning & Assessment Act 1979 (EP&A Act)

The Minister's consideration and determination of a project application under Part 3A must be consistent with the relevant provisions of the EP&A Act, including the objects set out in Section 5 of the EP&A Act. The relevant objects are:

(a) *to encourage:*

- the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,*
- the promotion and co-ordination of the orderly and economic use and development of land,*
- the protection, provision and co-ordination of communication and utility services,*

- (iv) the provision of land for public purposes,*
- (v) the provision and co-ordination of community services and facilities, and*
- (vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and*
- (vii) ecologically sustainable development, and*
- (viii) the provision and maintenance of affordable housing, and*
- (b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and*
- (c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.*

Council has considered the objects of the EP&A Act and considers that the application is consistent with the relevant objects. The assessment of the application in relation to these relevant objects is provided in Section 5.

3.2.5 Ecologically Sustainable Development

The EP&A Act adopts the definition of Ecologically Sustainable Development (ESD) found in the *Protection of the Environment Administration Act 1991*. Section 6(2) of that Act states that ESD “requires the effective integration of economic and environmental considerations in decision-making processes” and that ESD “can be achieved through the implementation of:

- (a) *the precautionary principle,*
- (b) *inter-generational equity,*
- (c) *conservation of biological diversity and ecological integrity,*
- (d) *improved valuation, pricing and incentive mechanisms.*

In applying the precautionary principle, public decisions should be guided by careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment and an assessment of the risk-weighted consequences of various options.

Council has fully considered the objects of the EP&A Act, including the encouragement of ESD, in its assessment of the application. An assessment of ESD issues is contained at Section 5.5 of this report. On the basis of this assessment, Council is satisfied that the proposal encourages ESD, in accordance with the objects of the EP&A Act.

3.2.6 Statement of Compliance

In accordance with section 75I of the EP&A Act, Council is satisfied that the Director-General's environmental assessment requirements have been complied with.

4. CONSULTATION AND SUBMISSIONS

4.1 Exhibition

Under section 75H(3) of the EP&A Act, the Director-General is required to make the environmental assessment (EA) of an application publicly available for at least 30 days. In accordance with the Instrument of Delegation dated 2010, Council assumed responsibility for coordinating the consultation and exhibition process with Government Departments and members of the public.

After accepting the EA, Council:

- made it publicly available from 13 October until 12 November 2010:
 - on the Department's website, and
 - at the Department's Information Centre and Randwick City Council administration building.
- notified landowners in the vicinity of the site about the exhibition period by letter;
- notified Department of Planning and relevant State agencies; and
- advertised the exhibition in the Southern Courier.

This satisfies the requirements of Section 75H(3) of the EP&A Act.

4.2 Submissions

In response to public exhibition and notification of the application, Council received 9 submissions from public authorities and 21 submissions from the local community. The issues raised are summarised below, and a full copy of the submissions are available on the Department of Planning Website. The issues raised in the submissions are addressed in the Assessment Section of this report and **Appendix B & D**.

4.2.1 Roads and Traffic Authority (RTA)

The RTA has reviewed the project application and has raised no issues regarding the capacity of Wansey Road and Alison Road to accommodate the additional traffic expected from the proposed development as indicated in the proponent's traffic report. However, the RTA/SRDAC has advised that the intersection of Alison Road and Wansey Road will be required to be reconfigured to incorporate a right turn bay on the Alison Road north-west approach for vehicles turning right into Wansey Road. Conditions will be applied to ensure that the intersection is reconfigured to the RTA specifications.

4.2.2 Transport NSW (TNSW)

Transport NSW raises no objections to the proposed development subject to the application of conditions to address the provision of bicycle parking facilities on-site and the preparation of a Work Place Travel Plan for workers having regard to the objectives and criteria contained in the Premier's Council for Active Living website. Conditions to address these requirements will be applied.

4.2.3 Sydney Airport Corporation Limited (SACL)

The application was referred to SACL, as the proposed height of the building would potentially result in permanent penetrations into controlled airspace which requires approval under the Airports (Protection of Airspace) Regulations 1996.

SACL has advised that with a maximum height of RL 95, the proposal would penetrate the Obstacle Limitation Surface (OLS) Conical Surface which is approximately 80-100m AHD across the site and the PARM Radar Surface Navigational Aid which is at approximately 62.5m AHD across the site.

Subsequently, the proponent would require approval from the Commonwealth Department of Infrastructure, Transport, Regional Development and Local Government (DITRD LG) as the proposal seeks to construct a permanent penetration within controlled air space and is considered a controlled activity. SACL's requirements are address by relevant conditions.

4.2.4 NSW Office of Water

The NSW Office of Water has raised no objection to the proposal and has provided its recommended conditions of approval which will be applied to the proposed development relating primarily to treatment and management of ground water.

4.2.5 NSW Industry & Investment

NSW Industry and Investment has reviewed the project application and the following comments have been provided:

The Environmental Assessment has addressed the issues of odour, noise, dust and waste management in general – the detailed design would need to be reviewed for further analysis by council.

Waste

Emptying 250, 240L bins per day may require good management for clean-up of spillage. A rainproof waste bay would minimise odour and depending on clean out times a second waste bay would enable stable clean-outs to continue while the other waste bay is being cleaned out. The timing of the waste truck movements may need to be considered regarding neighbourhood amenity.

Disposal of biosecurity risk material has not been mentioned, example disposal of animal bodies.

Noise

Using bob cats / front-end loaders and trucks picking up waste often generates noise from safety backing beepers. Only having a tree landscape between these activities and the nearest sensitive receptors will not barrier to any extent the noise from these sources, often noise consultants suggest vegetated raised earth mounds are used to reduce noise or locate the pick-up areas on the track side using the stables as a barrier.

Biosecurity / Animal Welfare

The adherence to the Code of Practice for Horses in Riding Establishments and Boarding Stables is adequate and the measures for biosecurity have been addressed apart from the disposal of biosecurity risk material in the waste plan.

Landscaping

Vegetation will need to be non-poisonous to horses and fenced off to avoid destruction by rubbing and grazing of horses.

Waste Water

Storm water will most likely contain some horse urine and faecal bacteria.

A number of conditions are included in the recommendation that suitably address the matters raised above.

4.2.6 Sydney Water

Sydney Water has reviewed the project application and advises that the current drinking water and wastewater systems have sufficient capacity to service the proposed development and no objection to the proposed development.

4.2.7 State Transit Authority (STA)

The STA has reviewed the project application and the following comments have been provided:

- 1. The STA will require in due course a copy of the traffic management plan or Traffic Control Plan for any road closures that may impact on bus operations, particularly those related to the demolition and construction stages. Suitable time will be required to undertake an assessment prior to the approval by the RTA and council.*
- 2. Any impact on a bus stop or bus stop infrastructure in relation to this development will need to be provided to STA for review.*
- 3. STA would like to be included in the consultation process for subsequent project applications at Royal Randwick Racecourse especially in relation to development fronting High St.*

The requirements from the STA will be incorporated as part of the conditions of approval.

4.2.8 NSW Health

NSW Health has reviewed the project application and the following comments have been provided:

- 1. The plumbing for the rainwater tanks requires colour coding in accordance with Enhealth Guidelines to prevent cross-connection with the potable water supply especially with respect to the proposed construction of stable residences. The plumbing should also comply with Australian Standard AS/NZS 3500 NSW Plumbing Code of Practice –which sets out the variations that meet the requirements of water utilities in Sydney and country areas of NSW.*
- 2. That the water in the horse pool is treated in such a way to prevent disease transmission and insect infestations such as flies and mosquitoes.*
- 3. Copies of any additional contamination reports prepared for the site are forwarded to the Public Health Unit for Human Health Risk Assessment and comment.*

The requirements from the NSW Health will be incorporated as part of the conditions of approval.

4.2.9 NSW Heritage Council

NSW Heritage Council has reviewed the project application and the following comments have been provided:

The overall concept of both projects is to enhance the public and operations facilities at the Royal Randwick Racecourse (RRC) to meet modern amenity standards. The project includes the relocation and public accessibility of the horse parading activity from the Stables Precinct into the Spectator Precinct. The Heritage Impact Statement is based on the historical information contained within the *Draft Royal Randwick Racecourse CMP prepared by Godden Mackay Logan* in December 2006. This document has not been provided with the supporting material and it is unclear if the proposed development addresses, or does not address the Conservation Management Plan (CMP) recommendations.

While it is acknowledged that the nomination of RRC for State Heritage Register listing in 2006 has not yet been finalised, Council is advised that Randwick Racecourse has been identified as having State heritage significance by the State Heritage Register (SHR) Committee in 2009. The SHR Committee is responsible for recommending the listing of items on the State Heritage Register to the Minister and contains members of the NSW Heritage Council. The Committee commented that:

The site is a unique NSW cultural landmark that includes the racecourse, grandstand, stalls and workshops in an array of traditional recreational architectural styles from the 19th and 20th centuries, set within a landscape of formal gardens and cultural plantings. Nominated by the Australian Jockey Club, the site is in multiple state government and private ownership

The committee advised that the Royal Randwick Racecourse was clearly state significant for its social value. As social value is a key aspect of its significance, the committee advised that the management of the site must allow for on-going change and development over time. The committee advised the Heritage Branch to progress this nomination in conjunction with discussion with the site's owners on its on-going use

At the June 2009 meeting, the same Committee identified 13 Priority Places, from a list of 30, which were to be progressed as part of the 2009/10 work program. This included the Royal Randwick Racecourse Randwick. It was noted that it would not be possible to list all 30 sites in the years 2009/10.

The Committee identifies that ongoing change and development of the site are appropriate to allow its long-term use. Nevertheless, this change should be managed in a manner consistent with its significance and the policies of a CMP where one exists. It should be acknowledged that in this instance, the proposed development will have material impacts on the heritage significance of the site. The demolition of the highly significant Teahouse, the redevelopment of the grandstands and the external alterations to Swab house will significantly alter the existing cultural heritage landscape. There may also be potential impacts to Non-indigenous and Indigenous archaeological significance as part of the Stables redevelopment.

Council should satisfy itself that the social and economic values of the proposed development outweigh the loss of significant heritage from the site, identified as being of State significance. Council should ensure that a thorough assessment against the policies of the existing CMP (prepared by GML in 2006) be undertaken and that appropriate justification is provided where the CMP policies are not being addressed.

Should Council consider the project appropriate for approval, a more robust mitigation regime should be imposed on the applicant to ensure proper interpretation of the elements that will be lost and robust management of impacts to heritage elements being retained supported by appropriate heritage, and archaeological heritage, specialist advice. The Heritage Branch provides additional Statement of Commitments items for each project (**Attachment A and B**) that should be addressed by the applicant and draft conditions of consent for your consideration as part of any conditions of consent granted (**Attachment C**). Council is further advised that the Heritage Branch is available to provide comment on any documentation prepared in relation to heritage as a consequence of conditions of any consent imposed.

The issues raised by the NSW Heritage Council are addressed in Section 5 and the recommended conditions and additional Statement of Commitments have been included in the instrument of approval.

4.2.10 Public Submissions

Twenty-one (21) submissions were received from residents in Wansey Road and Alison Road.

It should be noted that Council has received a copy of an additional correspondence between the objector at 6/108 Alison Road and the Department of Planning. This correspondence occurred outside of the Project public exhibition period. Additionally, there is nothing further in the objector's correspondence that has not already been addressed in Council's response to the objections contained in **Appendix C** of this Report.

The key issues raised in the public submissions are summarised as follows:

- Potential increase in traffic movement at Wansey Road and Alison Road
- Bulk and scale of the proposed buildings
- Increase intensity of use resulting in noise and odour issues
- Validity of the application under Part 3A
- Breaches of planning legislation and planning instruments.
- Conflict of interest in Council/Department determining the Project Application
- Heritage impacts

Comment:

The issues raised by the public have been addressed in Section 5. of this report and in the Proponent's response to submissions in **Appendix D**.

4.3 Proponent's Response to Submissions

Proponent provided a response to the issues raised in submissions (see **Appendix B**).