

26 November 2010

The General Manager
Randwick City Council
30 Frances Street
RANDWICK NSW 2031
Attention: Kerry Kyriacou and David Ongkili

Dear Kerry,

Response to Submissions – MP10_0098 Stables Precinct

In response to the 20 public submissions (on behalf of 17 residents) and 7 comments from State agencies and Council internal specialists, we provide the following response to each issue raised, see attached table.

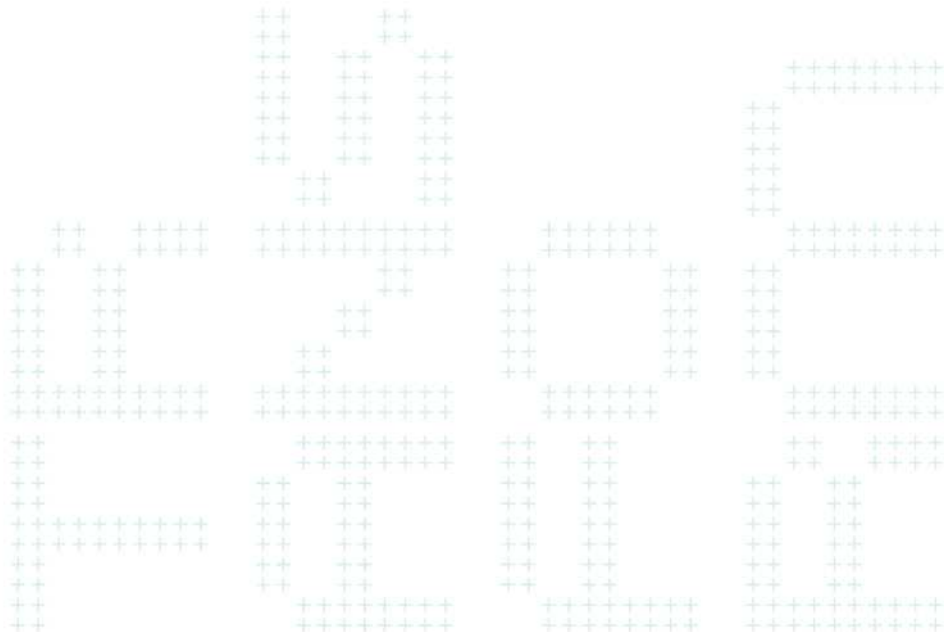
In summary, we consider that all matters can be addressed by way of the additional information provided herein and, where appropriate, the application of conditions of consent.

Please contact me on 8233 9952 if you require further information.

Yours faithfully,



Danielle Pinkerton
Senior Consultant





AGENCY COMMENTS	
Issue	Applicant Response
<p>NSW Industry & Investment</p> <ul style="list-style-type: none"> ▪ Rainproof waste bays would minimise odour. ▪ Require consideration of disposal methods of bio-security risk materials (animal bodies). ▪ Consideration of noise generated from vehicles with safety backing beepers. ▪ Vegetation will need to be non-poisonous to horses. 	<ul style="list-style-type: none"> ▪ Noted. It is expected this requirement will be include in the development approval conditions. ▪ A private contractor, Matthew Bathis Horse Transport will be engaged to collect and remove all bio-security risk materials, including animal bodies. ▪ Noise from safety reversing beepers has been considered in the Acoustic Report prepared by Arup, which indicates that these noises can be mitigated through appropriate space planning within the Stables Precinct. ▪ Noted. It is expected this requirement will be include in the development approval conditions.
<p>RTA-SRDAC</p> <ul style="list-style-type: none"> ▪ No objections to proposal on property grounds, provided development is clear of land required for road widening on Wansey Rd and Alison Rd. ▪ Intersection of Wansey Rd and Alison Rd is to be reconfigured to incorporate a right turn bay on Alison Rd northwest approach for vehicles turning right into Wansey Rd. ▪ Civil plans will be required for Alison Rd / Wansey Rd intersection reconfiguration prior to CC. ▪ Seeking to ban the use of the narrow / southern access driveway on Alison Rd (adjacent to the brick cottage) except in race events in accordance with the approved Special Events Transport Management Plan. ▪ Both existing Alison Rd access points are to comply with AS2890.1 and AS2890.2. ▪ Preparation of a Construction Traffic Management Plan prior to CC. ▪ All works are to be at cost of developer – and no cost to RTA. 	<ul style="list-style-type: none"> ▪ Noted. The proposed development is setback outside the road widening land on Wansey Road and Alison Road. ▪ Noted. It is expected this requirement will be included as a development approval condition. ▪ Noted as above. ▪ The existing access driveway on Alison Rd is to be used for race days for passenger vehicle exit and events for ‘bump-in, bump-out’ of larger vehicles. Clarification of details of the use of this access point will be clarified through the approved Special Events Transport Management Plan. ▪ Noted. AJC do not object to a condition to this effect being included in the development approval condition. ▪ Noted. AJC do not object to a condition to this effect being included in the development approval condition. ▪ Noted. It is expected this requirement will be included as a development

	approval condition and costs covered by s.94 Levy Contributions.
<p>Transport NSW</p> <ul style="list-style-type: none"> ▪ Plans should include bike parking and end-of-trip amenities such as showers and lockers. ▪ Recommend the Statement of Commitments include a Work Place Travel Plan to be prepared for workers to the site. 	<ul style="list-style-type: none"> ▪ Noted. It is expected this requirement will be included as a development approval condition. ▪ The proponent is happy to accept a condition to prepare a Work Place Travel Plan addressing transport management measures to be adopted for worker transport. The Work Place Travel Plan will be prepared in consultation with workers and trainers, and the recommendations of Transport NSW, the RTA and NSW Police.
<p>NSW Heritage Council</p> <p>The Statement of Commitments provided are not considered robust enough to manage the heritage impacts identified in the EA. The Construction Management Plan does not provide any guidance on the management of heritage impacts. The HIS report limits the mitigation measures to “archival photographic recording of the Spectator Precinct prior to the commencement of any works and the continued implementation of site wide interpretation”. This is not sufficient to guide construction works.</p> <p>The Statement of Commitments should be revised to include a commitment to prepare the following:</p> <ul style="list-style-type: none"> ▪ A Heritage Management Plan as a supplement to the existing Construction Management Plan which clearly identifies the measures to be undertaken to manage heritage impacts. ▪ Statements of Heritage Impact will be prepared for all heritage items directly impacted by the proposed development. They will be prepared according to the NSW Heritage Council guidelines. These documents will inform the preparation of a Heritage Management Plan (HMP) for the project. It is imperative that the SoHIs are prepared before the completion of a HMP. The nature of the impact must be clearly understood before the management measures can be developed. ▪ A Revised Interpretation Strategy which builds on the existing strategy prepared by GML 2007. The strategy should provide appropriate interpretation of the site and its use over time. ▪ A baseline European (Non-Indigenous) Archaeological Assessment should be prepared prior to any excavation works to identify any areas of potential 	<ul style="list-style-type: none"> ▪ Noted. AJC do not object to a condition to this effect being included in the development approval condition.

<p>European archaeological relics.</p>	
<p>NSW Health</p> <ul style="list-style-type: none"> ▪ Plumbing for rainwater tanks is to be colour coded in accordance with Enhealth Guidelines and must comply with Aust Standard AS/NZS 3500 NSW Plumbing Code of Practice. ▪ Water in the horse pool is to be treated in such a way to prevent disease transmission and insect infestations. ▪ Copies of any additional contamination reports prepared for the site are forwarded to the Public Health unit for Human Health Risk Assessment and comment. 	<ul style="list-style-type: none"> ▪ Noted. It is expected this requirement will be included as a development approval condition. ▪ Noted. It is expected this requirement will be included as a development approval condition. ▪ Any additional contamination assessment will be forwarded to Public Health at the discretion of the consent authority.
<p>NSW Office of Water</p> <ul style="list-style-type: none"> ▪ Groundwater <ul style="list-style-type: none"> – In accordance with the email received from ARUP on the 18 November, the Office understands the intent is for no more water to be extracted from the aquifer than is already mandated by the existing licenses. – No new ground water licences can be issued without groundwater trading. – The Office supports the design and construction of the equine tunnel structure precluding the need for permanent dewatering. It is noted in the ARUP email that the temporary dewatering will primarily be used for irrigation on the site. – The Office’s recommended conditions of approval with respect to temporary groundwater dewatering are provided at Attachment B. ▪ Detention Pond <ul style="list-style-type: none"> – The NSW Office of Water advises that any infiltration from this proposed basin must not impact the ambient quality of the groundwater in the area and further assessment of water quality impacts would be required to determine the appropriate mitigation measures. ▪ Riparian Planting – supported, however recommends: <ul style="list-style-type: none"> – the riparian planting emulates the local native vegetation community; and – the minimum width of the riparian area be no less than 10 m measured from top of shore of the detention basin to assist in improving water 	<p>The comments from the NSW Office of Water have been reviewed by our Stormwater and Sustainability Engineers, and the following response is provided:</p> <ul style="list-style-type: none"> ▪ <i>The stable development will not provide any additional nitrate to the ground, the stables currently adopt a manure collection and storage regime and urine from the horses’ stable washdown will be directed to the sewer system and not surface water.</i> ▪ <i>If water quality monitoring is deemed necessary by the Office, is it suggested that initially a water quality sample is taken from the existing 6 abstraction boreholes and tested for nitrate.</i> <ul style="list-style-type: none"> - <i>If relatively high concentrations of nitrate are identified, a longer term monitoring regime could be implemented on the site, with a sample tested each quarter. Sampling and testing would then occur for a minimum of 6 months to monitor any increases in concentration. If an increase in nitrate concentrations is not seen, further sampling would be deemed unnecessary.</i> - <i>If the results show low to negligible concentrations of nitrate on the site, a longer term monitoring strategy would be deemed unnecessary.</i>

<p>quality.</p> <ul style="list-style-type: none"> ▪ Draft Statement of Commitments under “Ecologically Sustainable Development” to be revised to remove the reference to: <ul style="list-style-type: none"> (3) <i>“infiltration and aquifer recharge from the stabling precinct will be adopted”.</i> 	<ul style="list-style-type: none"> ▪ Noted. AJC do not object to this portion part of the Statement of Commitments being removed.
<p>Randwick City Council – Strategic Planning</p> <ul style="list-style-type: none"> ▪ Project Application does not commit to closure of existing stable facilities. ▪ Recommend the following conditions: <ul style="list-style-type: none"> – 600 cap on the number of horses stabled on the site. – Existing stables be progressively decommissioned within a specified time as new stables are constructed. ▪ Public Domain considerations required for the Stables Precinct which borders a dedicated cycle path and footpath access to UNSW. Council recommend this include consideration of <ul style="list-style-type: none"> – Lighting up-grade on Wansey Rd to ensure adequate vision and safety around the entrance to the stables precinct – Detailed design of any entry gate / fence on Wansey Rd should have regard to provision of adequate sight lines for vehicles, cyclists and pedestrians. 	<ul style="list-style-type: none"> ▪ The Stables redevelopment relates only to the Stables Precinct land, being the land to which the Clause 6 declaration was made, and therefore works beyond the Stables Precinct are outside the scope of the proposal. However, the existing stables will be de-commissioned as the new stables within the Stables Precinct are constructed and become operational. On this basis the proponent is happy to accept a condition to decommission the existing stables as new stables are completed and available for occupation. ▪ Noted. It is expected this requirement will be included as a development approval condition which only restricts the number of thoroughbred racehorses, noting that other horse are required on site, such as ponies and other associated AJC service horses. We would recommend the condition to read to the follow effect: <p style="text-align: center;"><i>The 6 Stable Buildings are to house a maximum of 600 thoroughbred racehorses, plus any ancillary horse / ponies as required.</i></p> ▪ Noted. It is expected this requirement will be included as a development approval condition.
<p>Randwick City Council – Heritage</p> <ul style="list-style-type: none"> ▪ Concerned with the demolition of the existing Stables at corner of Alison and Wansey Rd, and request investigation of alternative options to retain several of 	<ul style="list-style-type: none"> ▪ The AJC’s heritage consultants have reviewed the comments from Randwick City Council’s Heritage Officer and provided the following response to this

<p>the buildings or reuse of components of the buildings in the precinct.</p> <ul style="list-style-type: none"> ▪ Loss of Training Track and Bull Ring – loss of Training Track and Bull Ring as landscape elements has not been fully investigated. ▪ Landscape Screening – HIS needs to respond to the outcome of the Visual Analysis and address how the Members Stand will benefit from new landscaping as well as existing. 	<p>matter:</p> <p><i>The 2006 Draft Royal Randwick Racecourse Conservation Management Plan notes that much of the built fabric in this area has been replaced with various upgrades to the area and that the remnant original fabric in these structures is deteriorated.</i></p> <p><i>The current requirements of owners and trainers using the facilities at RRR is that they meet contemporary expectations and the rigorous standards set by the NSW Department of Primary Industries and Racing NSW. Given the value of their thoroughbreds, it is unreasonable to accept substandard levels of accommodation.</i></p> <p><i>As such, it is not possible to retain the existing buildings as part of the proposed upgrade to the facilities. The building materials cannot be reused as they do not meet the current legislative standards for fire rating.</i></p> <ul style="list-style-type: none"> ▪ The response by Graham Brooks and Associates is: <ul style="list-style-type: none"> <i>The HIS notes there is historical evidence to show that training tracks in this area have varied in size and configuration over time. The new Bullring is part of the continued evolution of the site, enhancing its significance as a highly esteemed racing and training facility.</i> <i>Overall the proposed new landscaping is considered to complement the significance of the site and be a positive heritage outcome.</i> ▪ The response by Graham Brooks and Associates is: <ul style="list-style-type: none"> <i>The HIS notes that the Members Stand (Official Stand) is physically and visually separated from the subject site by the Racetrack and the existing site landscaping, and that the proposed development will have no adverse impact on public views to and from this stand.</i>
<p>Randwick City Council – Traffic Engineer</p> <ul style="list-style-type: none"> ▪ No objection to on-site parking, however call for a revised Traffic Report addressing the following issues. ▪ Request an additional typical day parking survey be undertaken to verify parking estimates. ▪ Clarify if comments in Section 2.2.4 of Traffic Report are recommendations or requirements. ▪ Require a condition for bicycle parking to be provided on-site at a rate of 1 bicycle spaces per car parking space. 	<ul style="list-style-type: none"> ▪ The parking figures quoted in the Traffic Report have been based on parking surveys undertaken by Stapleton Transportation + Planning and considered adequate, it should be noted that peak hours for parking are between 4.30am and 9.30am, and 2pm to 4pm, and therefore parking assessments in accordance with normal 9am to 5pm requirements are not applicable to this proposal. <p>Recommendations</p> <ul style="list-style-type: none"> ▪ One bike space per car space is too high. A more appropriate number would be a total of 20 bike parks. AJC do not object to a condition to this effect

<ul style="list-style-type: none"> ▪ Require clarification of development’s traffic distribution methodology. ▪ Condition proposed for parking to be reserved for specific uses. ▪ Condition proposed for design of pedestrian refuge island at Wansey Road and Arthur St. ▪ Support the objective of new Wansey Road access to prevent vehicles turning right out of the Stables, and turning left into the Stables. ▪ Concerned with ability of a 19m articulated vehicle to use new access. ▪ RTA requires reconfiguration of Alison Rd to provide a right turn bay on Alison Rd north-west approach for vehicles turning right into Wansey Rd. ▪ RTA require lane assignment of Wansey Rd approach to Alison Rd to be: <ul style="list-style-type: none"> - two lanes for vehicles egressing Wansey Rd. - one lane for vehicles accessing Wansey Rd from Alison Rd. 	<p>being included in the development approval condition.</p> <ul style="list-style-type: none"> ▪ Undertaken by assessment of the current activity ▪ Parking within the new stabling complex will be restricted by appropriate access control ▪ The reference to ‘Arthur Street’ appears to be an error, as is significantly further way from the proposed development, It is assumed the objector was referring to ‘Prince Street’ which would be appropriate and could be incorporated in the design of the Alison Road / Wansey Road intersection right turn lane. ▪ Noted. This is intended for large vehicles only, passenger vehicles will not be restricted. The access will be designed to accommodate the required vehicles. ▪ Noted. ▪ There are two existing egress lanes from Wansey to Alison that address this issue. ▪ Noted. AJC do not object to a condition to this effect being included in the development approval condition and costs covered by s.94 Levy Contributions.
---	--

OBJECTOR ISSUES	
Issue	Applicant Response
<p>Inappropriateness of Location</p> <ul style="list-style-type: none"> ▪ The proposed Stables location is within too close proximity to the residential area on Wansey Road, and will be disruptive with residents. ▪ Introducing horse smells and noise into the Stables Precinct is out of context with the current surrounding context, and would be more appropriate in Camden. <p>Stables should be located on High Street where the existing stable buildings are located, and High Street should be widened to accommodate the racecourse and University expansion.</p>	<ul style="list-style-type: none"> ▪ The location of the new stables within the Stable Precinct is considered appropriate, as it will consolidate the historic use of this precinct which has been accommodating stable and training activities and facilities since the 1860's. Further, the location of the stables is supported by the adopted planning policies, including the Royal Randwick Racecourse site specific DCP. ▪ Locating the stables on High Street would result in significant traffic conflicts with the existing large traffic flows along High St related to the University and Hospital. The widening of High Street is beyond the scope of this proposal, and would not improve accessibility to the Stable Precinct.
<p>Traffic and Access</p> <ul style="list-style-type: none"> ▪ Wansey Road is too narrow to cope with the additional traffic. ▪ Large trucks accessing the Stables Precinct currently struggle to turn into the Precinct from Wansey Rd and block the carriageway. ▪ Access should be via High Street, where it would not conflict with residential movements. ▪ Concerned with the daily large service vehicle movements for delivery of feed, bedding, training equipment and waste removal. 	<ul style="list-style-type: none"> ▪ Additional traffic is marginal in volume, much of which will arrive and depart outside the conventional peak hour. The small increase is simply a redistribution of the existing traffic movements to the existing racecourse stables. The total volume of vehicular movements to and from the Stables is not expected to change from the current volumes. Any increases in Wansey Road vehicle movements will see comparable reduction in Doncaster Avenue and High Street ▪ The Stables Precinct redevelopment includes upgrading the existing access from Wansey Road, which will remove the hair-pin turn into the site and improve access for vehicles entering and exiting from Wansey Road, as detailed in Section 4.2 of the EA Report. ▪ Access via High St was considered in the design development phase, however was considered inappropriate for the Stables Precinct as it would conflict with University and Hospital Traffic moving along this road. ▪ Service vehicles have been considered in the Transportation Report prepared by Stapleton Transportation + Planning, and the Acoustic and Odour Reports prepared by Arup which accompanied the EA Report. These reports concluded that service vehicle movements via Wansey Road are appropriate in terms of traffic management and acoustic residential amenity.

<ul style="list-style-type: none"> ▪ Wansey Road is already a busy residential street due to its proximity to the University and Hospital. ▪ Two marked pedestrian crossings should be installed in Wansey Road. ▪ Should the development proceed, then traffic pacifying devices should be installed along Wansey Road. ▪ During construction: <ul style="list-style-type: none"> – All construction related parking should be accommodated on-site – No construction vehicle access should be via Wansey Road. ▪ Vehicle entry to the Stables Precinct should be via a signalised intersection on Wansey Road, with lights put in at the bottom of Wansey Road. ▪ Concerned 'No Parking' signs will be introduced along Wansey Road. ▪ Proposal does not include comment from the RTA. ▪ It is unacceptable to allow heavy vehicles to enter the racecourse via Wansey Road, as this access cannot accommodate B-Doubles or horse-floats. ▪ Increased traffic will increase danger to pedestrians and cyclists which have a high presence in the area, and along Wansey Road. ▪ Currently not uncommon for cars in Wansey Road to be side-swiped. ▪ If development proceeds, there needs to be significant widening of the 	<ul style="list-style-type: none"> ▪ Noted. AJC do not object to a condition to this effect being included in the development approval condition and costs covered by s.94 Levy Contributions. ▪ Noted. No traffic pacifying devices are proposed within Wansey Road. ▪ Noted. These concerns will be addressed in the Construction Traffic Management Plan. It is expected this requirement will be included as a development approval condition. ▪ An intersection up-grade has been called for by the RTA and has been considered by Stapleton Transportation + Planning and considered to be capable of being accommodated to include: <ul style="list-style-type: none"> – A right-hand turning bay from Alison Road into Wansey Road. – Line markings for vehicles turning out of Wansey Road into Alison Road for one right turn lane and two left turn lanes. <p>It is anticipated that these upgrade requirement will be included as a development approval condition and costs covered by s.94 Levy Contributions.</p> ▪ The proposal does not include any parking restrictions along Wansey Road and the Transport Report has not identified that these will be required for the continued use of the Wansey Road access for the Stables Precinct redevelopment. ▪ The Environmental Assessment was referred to the RTA as part of the agency consultation process under the <i>Environmental Planning and Assessment 1979</i>. Consideration of the RTA comments is outlined in Table 1 above. ▪ No change is expected from the current position. ▪ The proposed less acute angle of new entry will improve visibility for vehicles entering and exiting the Stables Precinct. ▪ Noted. ▪ The Traffic Study undertaken by Stapleton Transport + Planning does not
--	--

<p>western side of Wansey Road in a matter that will not lose amenity of shared wide bicycle / pedestrian track.</p>	<p>identify this work as necessary. This is not required.</p>
<p>Bulk and Scale</p> <ul style="list-style-type: none"> ▪ Scale of the proposal is excessive. ▪ The ‘two storey’ description of the Stables is misleading, and believes it is to be equivalent to 4 residential storeys. ▪ Revised perspectives should be prepared from the main stretch of Wansey Road. ▪ Proposed new stables are too high, and too close together. ▪ Buildings are ugly ‘industrial buildings’ which are appropriate for an industrial estate. ▪ Height and size of stable buildings on a residential street is ugly and inappropriate. ▪ Building height should be reduced as it is only so high for aesthetic purposes. ▪ Proposed stable buildings are too high and will adversely affect aspect access Wansey Road and Alison Road. ▪ Stable blocks should be single storey, due to each level being equivalent to two residential storeys. 	<p>The Environment Assessment documentation included consideration of the bulk and scale of the proposed building forms in Section 6.1. The tallest buildings within the precinct will be the Stable Buildings with an overall height of 12.63 metres. It is noted that the natural topography of the Stables Precinct provides level change and separation between the Stables Precinct and Wansey Road residents to the east, which will reduce the overall height of the built form visible from outside the site.</p> <p>The landscaping along the Wansey Road boundary of the Stables Precinct will provide a visual, acoustic, and dust which will be complementary and compatible with the existing landscaping along Wansey Road.</p> <p>Revised perspectives have been prepared from Wansey Road and 108 Alison Road which accompany this response.</p>
<p>Loss of Views</p> <ul style="list-style-type: none"> ▪ Concerned there is no restoration of historical views across the Racecourse to residence along Wansey Road and Alison Road. ▪ New landscaping along Wansey Road will block views currently enjoyed. ▪ Height and size of development will obliterate views previously enjoyed. ▪ Question the impact of the development on the Moreton Bay Fig trees along Wansey Rd. 	<p>Revised perspectives have been prepared from Wansey Road and 108 Alison Road which illustrates that distant views across the racecourse will be preserved. Landscaping will effectively screen the proposed buildings which occupy the foreground portion of the view across the site from adjoining properties. The location and scale of the buildings and landscaping is considered appropriate in the context of the locality.</p> <p>The impact of the development on the Moreton Bay Figs along Wansey Road are considered in the Arborist Report prepared by Earthscape Horticultural Service which accompanied the Environmental Assessment documentation, and indicates that all Moreton Bay Figs along Wansey Road will be retained.</p>

<p>Noise</p> <ul style="list-style-type: none"> Proposal will generate unacceptable early morning noise and activity directly adjacent to the residential area. Density of the proposed development will create problems with pre-dawn noise and smell. Intensity of development will generate noise from vehicles and people at the crack of dawn. 	<p>The Acoustic Report prepared by Arup concludes that the location of the stable and training activities within the Stables Precinct, and the use of the proposed mitigating measures will not generate adverse acoustic impacts on residents on Wansey Road or Alison Road, or acoustic impacts that exceed the Amenity Criterion applicable to the development.</p>
<p>Odour and Dust</p> <ul style="list-style-type: none"> Horse waste areas should be sealed and removed in sealed vehicles to minimise smell. 	<p>Noted. AJC do not object to a condition to this effect being included in the development approval condition.</p>
<p>Contamination</p> <ul style="list-style-type: none"> Concerned with the dirt piles that have been identified as being 'contaminated' within the Stable Precinct and as a matter of urgency would like to know what contaminants have been identified. 	<p>The Preliminary Contamination, Salinity and Acid Sulphate Soil Assessment prepared by Douglas Partners was included in the Environmental Assessment documentation (Appendix Z) and is publically available on the Department of Planning's online Major Projects register, or in hard copy at the Randwick City Council office.</p>
<p>Apprehension of Bias</p> <ul style="list-style-type: none"> Question the interests of industry and government bodies in the development. Request an independent committee be appointed as a decision making authority. 	<p>The Minister has determined that the proposal will be referred to the Planning and Assessment Committee (PAC) for determination.</p>
<p>Inconsistent with Planning Policy</p> <ul style="list-style-type: none"> Proposal does not comply with Section 2.4 Item 12 of the RRR DCP, which states the establishment of training facilities are 'desirable' in the Wansey Road area but does not mention Stables. 	<p>Section 3.1 of the Royal Randwick Racecourse DCP outlines the '<i>general pattern of land uses across the site</i>'. The proposed Stable and Training facilities are situated within the 'Bull Ring Precinct' which is proposed to be used for '<i>Stable and Training</i>', which is entirely consistent with the proposed development. This is discussed in detail in Section 5.5.1 of the Royal Randwick Racecourse DCP.</p>
<p>Loss of Open Space</p> <ul style="list-style-type: none"> Proposal will result in the loss of open space on the racecourse within the Stables Precinct, but it does not propose to have the existing High Street 	<p>The racecourse is privately leased recreational space. While the proposal will increase the building footprint within the Stables Precinct, the additional built form is consistent with planning policy framework. While the proposal does not</p>

<p>stables demolished to open up new open space areas.</p>	<p>specifically include the demolition of the existing Stable buildings on High Street, and these buildings will be decommissioned as the new stables are constructed and occupied.</p>
<p>Not a Part 3A Development under the EP&A Act</p> <ul style="list-style-type: none"> ▪ The proposal is not <i>‘for the purpose of’</i> a Racecourse. 	<p>The proposed Stable Precinct redevelopment comprises both Stables and Training facilities which are an integral part of thoroughbred horse racing and the operating of a racecourse facility.</p>
<p>Non-Compliance with Planning Requirements, Provisions and Principles</p> <ul style="list-style-type: none"> ▪ EA documentation is non-complaint with the DGRs, as it has not considered the visual impact of the proposal on Alison Road and the nearby residences. ▪ Proposal breaches the EP&A Act and Regulations as will result in: <ul style="list-style-type: none"> – Reduction of Economic Welfare – Lack of proper Community Consultation – Existing Use Rights – Bulk and Scale – Relevance for new stables – Impact on adjoining lands ▪ Proposal is in breach of the LEP, as residential development is not a permissible use. ▪ Development breaches the ISEPP. The development is in breach of the DCP. ▪ Proposal is contrary to the Specialised Centre Paper and Development Strategy paper. 	<ul style="list-style-type: none"> ▪ Additional photomontages and view analysis has been undertaken, as part of the response to the submissions, including an assessment of the visual impact from 108 Alison Road. ▪ The proposal has been considered against the relevant provisions of the EP&A Act and Regulations and: <ul style="list-style-type: none"> – It has not been identified the proposal will reduce economic welfare. – Community Consultation has been undertaken in accordance with the Consultation Strategy submitted with the Environmental Assessment. – Does not rely on existing use rights, as is permissible within the zone. – The existing stables are dilapidated and require replacement, which will result in the existing stables being decommissioned as new stables are completed. – Significant consideration and assessment has been undertaken in the design development and consultation process to identify and manage impacts of the development on adjoining properties. ▪ The small amount of stable hand / strapper accommodation included in the development is ancillary to the stable and training operations. ▪ The proposal has been referred to the RTA and considered against ISEPP. ▪ The development has been considered in the context of the RRR DCP, and the stables buildings are generally two-storey in height with only a small portion of the building containing an additional ‘mezzanine’ or ‘loft’ level. ▪ The Specialised Centre Paper is on public exhibition and not yet formally adopted. The aims and objectives of these Strategy’s are for the whole precinct and should not be applied rigidly to all properties.