

Clause 6 Request & Preliminary Environmental Assessment – Randwick Racecourse Stables Precinct

Prepared on behalf of the Australian Jockey
Club Limited

July 2010

urbis

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Executive Summary

This report has been prepared on behalf of the Australian Jockey Club Limited (AJC), the lessee of the Royal Randwick Racecourse (RRR) situated within the Local Government Area of Randwick.

AJC propose to consolidate the existing stabling and training facilities currently dispersed across the RRR site and within the surrounding street blocks into a single 'Stable Precinct' in the north-eastern portion of the RRR site. The Stable Precinct development comprises:

- 6 two-storey stable buildings accommodating a total of 600 stables.
- A single-storey tie-up stall building with 50 stalls.
- 12 double-storey mechanical horse walkers, each with capacity for 20 horses.
- Two-storey staff accommodation building with 48 bedrooms for early start staff.
- A bull ring for horse walking and training.
- Two parade rings.
- An equine pool.
- Refreshment building for trainers, staff and jockeys.
- Ancillary structures including a shaving store, waste management building, and car parking.

The purpose of this report is to request that:

1. The Minister for Planning form an opinion that the proposal is of a kind described in Group 6 Class 15 in Schedule 1 of State Environmental Planning Policy - Major Development (2005) (Major Development SEPP), as a Major Sporting Facility with a capital investment value of greater than \$30 million.
2. The Director General issue Environmental Assessment Requirements to inform the preparation of an Environmental Assessment to accompany a Project Application for the proposed development.

All elements of the proposed development are permissible in the zone and consistent with the objectives of the Local and State Government in terms of the use of the site.

Key issues relating to the proposal include local traffic and parking, amenity impacts, landscaping, and operational matters. All issues will be assessed thoroughly in the context of the environmental assessment report for the proposal to ensure that any environmental impact is mitigated.

Building upon the good existing working relationship with Randwick City Council, AJC is willing to work with all key stakeholders during the assessment process in order to achieve the most optimal outcome for all concerned.

To support the request for the Director General's Requirements, this submission provides a Preliminary Environmental Assessment (PEA). This PEA details the principle elements of the Stable Precinct proposal, identifies the relevant planning policies, outlines the anticipated key issues of the proposal and the potential approach to address these matters as part of the Environmental Assessment Report.

The proposal has a capital investment value of approximately \$50 million and is part of a '*major sporting facility*' and therefore qualifies as a Major Development pursuant to State Environmental Planning Policy (Major Development).

1 Site Details

1.1 Site Description

The Stable Precinct ('the Precinct') comprises the eastern portion of the Royal Randwick Racecourse site, which is situated in Sydney's eastern suburbs, adjacent to the University of New South Wales (UNSW) main campus.

The Precinct has an area of approximately 9ha, with a principle frontage to Wansey Road to the east, which vehicle access is obtained from, and a secondary street frontage to Alison Road to the north-east.

An aerial of the site indicating the extent of the site for this proposal is shown in **Figure 1** below.



SITE PLAN - STABLES PRECINCT STAGE 1 PROJECT APPLICATION

Figure 1 – The Stables Precinct site.

1.2 The Site Context

The RRR site is one of the largest recreation areas in the highly urbanised Eastern Suburbs. Regionally, the site is strategically significant due to its relative close proximity to a number of key Inner Sydney features including:

- UNSW main campus immediately to the South.
- Prince of Wales Hospital immediately south-east.
- Sydney Airport – 6km
- Sydney CBD – 6km
- Bondi Beach – 5km
- Coogee Beach – 3km.

Locally, the RRR site has an interface with many different localities each with a distinct character.

The Stables Precinct in the eastern portion of the RRR site situated at the corner of Alison Road and Wansey Road, has vehicle access obtained from Wansey Road. The Wansey Road frontage is densely vegetated by a mix of large mature trees including Morten Bay Fig Trees and Plane Trees providing dense foliage. The topography of the Stables Precinct slopes away from Wansey Road, creating visual and acoustic separation between the Stables Precinct and the residential development running along the eastern side of Wansey Road.

The area surrounding the Stables Precinct consists of:

- To the north-west – the RRR racing track, and Spectator Precinct, and further north Centennial Park.
- To the east - residential area consisting of a mix of one and two storey single dwellings and three storey residential flat buildings.
- To the south – the 'Steeple Hill Precinct' which currently comprises older-style stable and training facilities (which are to be replaced by the proposed stable facilities), and further to the south of High Street the University of New South Wales (UNSW) and the Prince of Wales Hospital.
- To the south-west – the 'High Street Precinct' which is occupied by older-style stable and training facilities (also to be replaced by the proposed new stables), and further west Anzac Parade which is a mixed use corridor for public transport and local strip-shopping.

Connectivity and accessibility to the Stables Precinct would be via major bus routes running along Alison Road, Anzac Parade, and High Street. The Precinct already accommodates stabling and training facilities. Access to these existing facilities is already available off Wansey Road and Alison Road.

2 Description of Proposal

2.1 Vision for Randwick Racecourse

The Royal Randwick Racecourse site is a substantial land holding located in the heart of Sydney's Eastern Suburbs. At the same time as enhancing the racing related facilities and function of the site, redevelopment of the various precincts within the RRR site will enable more efficient utilisation of the RRR land, enabling the site's long-term development potential to be realised and the area to be better integrated with surrounding uses.

The AJC vision for Royal Randwick Racecourse is based on a number of desired outcomes:

- To ensure the financial sustainability of the racing function of the site and improve the existing spectator and horse-related facilities to a world best standard.
- Realise the development potential of this strategically significant location and take advantage of the sites proximity to key Sydney destinations and good public transport connections.
- Better integrate the site with the immediately surrounding area including connections to the University and Hospital both physically and in terms of usage.
- Assist in improving the accessibility of the locality through improved public transport and parking arrangements.
- Creation of a large number of new full time jobs, new construction jobs and the protection of existing employment not only at Randwick but in NSW's second largest industry which includes racing training and breeding.
- The construction of a retail offering to complement the existing shopping strip of Kensington.
- The provision of a mix of residential accommodation that provides housing for essential service workers, students, professionals (lecturers and physicians), families visiting hospital patients and the broader community.

2.2 The Stables Precinct

2.2.1 Overview

The proposed Stables Precinct development will consolidate the existing stabling facilities situated across the RRR site into a single location, and will also bring together other off-site stabling facilities. The objective of consolidating these facilities is to:

- Provide state-of-the-art, and modern stabling facilities.
- Improve accessibility of shared facilities to all stables, and avoid duplication of facilities where appropriate.
- Improve safety for horse access to the RRR facilities for horses currently in off-site stables.
- Enhance the stabling facilities to the level of best practice, to elevate the RRR to a world-class racecourse, attracting major international equestrian events.

The stables development will generally result in a like-for-like volume of stabling facilities, providing approximately 600 stables within 6 two-storey stable buildings. The key facilities which will be accommodated in the Stables Precinct are indicated on the plan prepared by Robertson + Marks Architects attached in **Appendix B** and detailed below.



SITE PLAN - STABLES PRECINCT STAGE 1 PROJECT APPLICATION 

Figure 2 – Site Plan with indicative Stage 1 Stables Precinct Development

2.2.2 New State-of-the-Art Stables Facilities

The existing stable facilities are generally dilapidated and scattered across the site, principally in three areas: the Lower High Street area; Upper High Street area; and the Proposed Stables Precinct. The Project Application will consolidate the stable facilities into a single location with modern stabling facilities incorporating state-of-the-art technology and innovation.

Some 600 stables are proposed to be accommodated within 6 two-storey stable buildings, generally accommodating 100 stables per block. Each level of the stable block will typically comprise:

- 50 stables for live-in horses.
- Two Sandrolls, utilised by horses prior to washing.
- Four Washbays
- Trainers' Office.
- Feed Store, Storeroom, Tack room and Laundry.
- Stable Hand / Caretakers Accommodation.

The 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 network coming from the car parking area.

A new tie-up stalls building is also proposed for visiting horses, which come for training. The Tie-up stall building will be a single storey building, with 50 stalls and two wash-bays.

Both the Stables and Tie-up Stall buildings will incorporate best practice architectural design, including maximising cross flow ventilation amongst other environmentally sensitive and sustainable elements.

The location of the Stable and Tie-up Stall buildings is situated in the northern portion of the Stables Precinct, which is in closest proximity to the racetrack and setback from the residential development along Wansey Road by a topographical change, parking facilities and a two-storey staff accommodation building with 48 bedrooms for early-start staff.

2.2.3 Horse Exercise and Training Facilities

12 two-storey mechanical Horse Walkers are proposed within the Stables Precinct. The Horse Walkers will incorporate modern walking machines, which will improve equestrian safety and operational efficiency.

A larger 'Bull Ring' is proposed in the western portion of the Stables Precinct, which provides two horse walking tracks, for exercise and training purposes.

Two smaller 'Parade Rings' are proposed between the Stable Blocks. These rings will provide facilities for exercising, training and showing horses. An equine pool is also proposed between Stable Blocks C and D for equine exercise and cooling after training.

2.2.4 Equine Tunnel

A key improvement of the Stable development is the introduction of an Equine Tunnel, which will connect the Stables Precinct to the track. The Equine Tunnel will extend under the track and connect to the infield. The Equine Tunnel will improve safety for both horses and riders, as well as improve efficiencies of the operation of the track, as horses moving across the track will not interfere with users of the track.

2.2.5 Access, Car Parking and Loading

Rationalisation of the vehicle access to the stable facilities will be provided through consolidating the stable facilities. The existing vehicle access point from Wansey Road will be used to service the new Stable Precinct.

Parking facilities are proposed for:

- 45 passenger vehicles.
- 15 horse float parking spaces.

The car parking and access areas will be designed to enable all vehicles to enter and exit the site in a forward direction.

2.2.6 Ancillary Facilities

The proposal will include a number of other ancillary structures, which provide support services to the stables, including:

- Waste collection facilities building.
- Shaving Store for horse bedding materials.
- Refreshments kiosk for trainers and riders.
- A two-storey early-start staff accommodation building with 48 bedrooms in the southern portion of the precinct, adjacent to Wansey Road.

2.2.7 Minor Alterations to Vehicle Access Design from Gate 8

As part of the project application, works are proposed to the existing vehicle access located at Gate 8 on Alison Road. The proposed works will aim to improve the functionality of this access road for passenger vehicles and loading as an access point to the central area of the racecourse which is utilised in major events.

3 Strategic Planning Context

3.1 Draft East Subregional Strategy

The Draft East Subregional Strategy (the Strategy) has seven key directions, of which *Direction 7 – Protect and Promote Scenic Quality and Tourism* has direct relevance to the proposal.

The improvement of sport and recreational facilities falls within the ambit of the '*parks, public places and culture*' strategy, and identified RRR as a 'sports / active park' with stadium facilities, as illustrated on the Parks Public Spaces and Culture Subregional Map extracted below.

The proposed Stables Precinct redevelopment can contribute to the achievement of a number of actions identified to achieve the key directions of the Strategy, including:

- A2.2 – Strengthen industry clusters through consolidating both existing RRR stabling facilities and off-site stabling facilities into a single location.
- A2.4 – Utilise local assets to encourage learning and innovation, by upgrading the stables to provide world-class, state-of-the-art equine training and accommodation facilities.
- F3.1 – Improve Sydney's major sporting and cultural event facilities, through attracting high-profile trainers, horses and jockeys to RRR.
- F4.1 – Recognise and build upon Sydney's cultural life.
- F4.3 – Continue to co-ordinate and plan for the improvement of tourism precincts in Sydney to maximise the visitor experience, by providing racecourse facilities which are world-class and capable of hosting international standard horse-racing events.

The environmental assessment will detail how the proposed stables development will contribute to the achievement of these subregional actions.

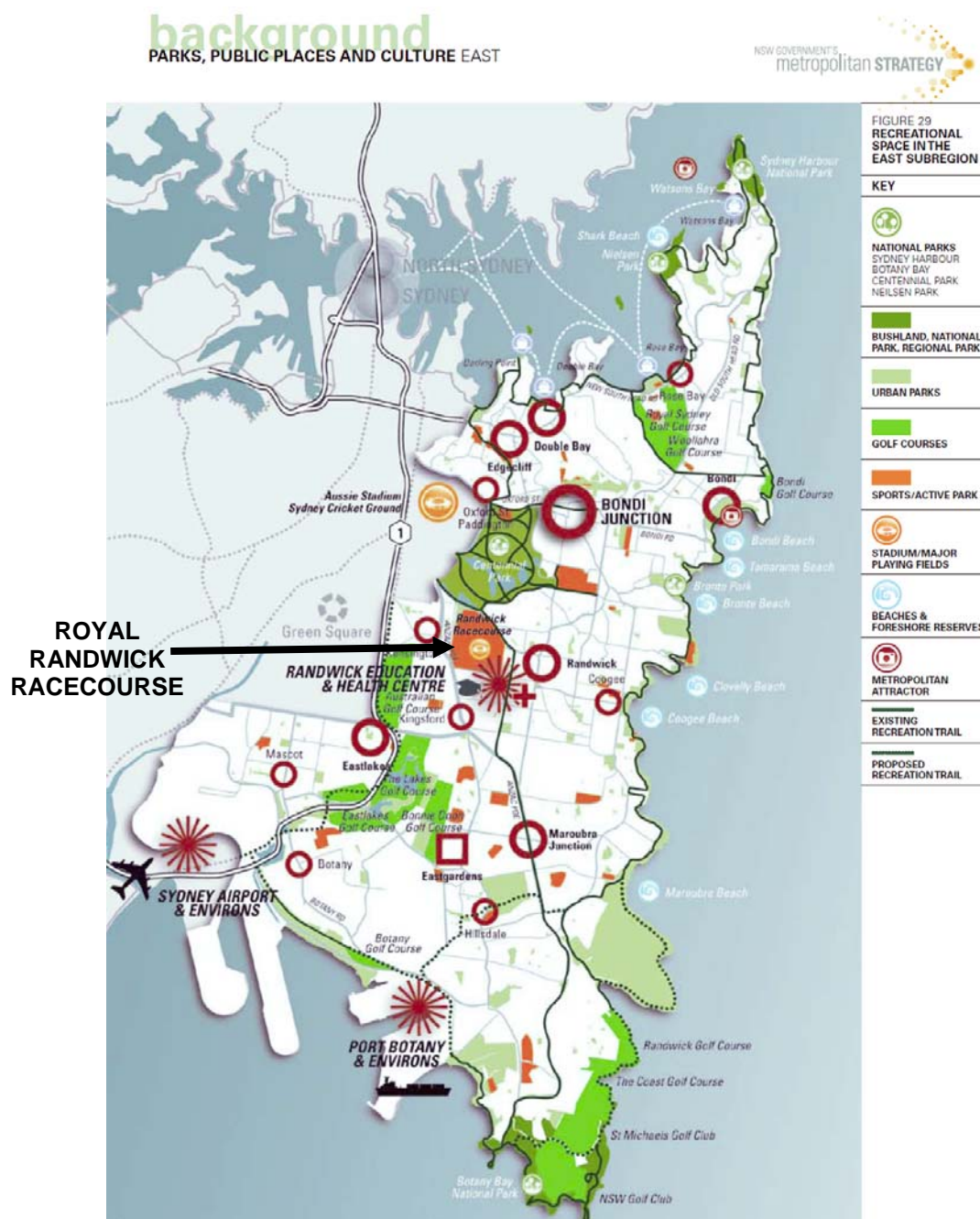


Figure 3 – ‘Parks, Public Spaces and Cultural Map’ Extract

Source – Draft East Subregional Strategy, p.105

3.2 State Environmental Planning Policy No.55 – Remediation of Land

SEPP 55 seeks to ensure remediation of contaminated land is carried out on development sites in order to minimise the risk of harm to human health. Clause 7 of *SEPP 55* requires that a consent authority must consider whether land is contaminated prior to issuing development consent.

The proposed consolidation of the stabling facilities of the RRR will have minimal human contact with soils. However, investigations will be undertaken as part of the environmental assessment process to ensure the land will not contain any contaminants that are unsuitable for the proposed use.

4 Local Planning Instruments

4.1 Randwick Local Environmental Plan 1998

The principle local environmental planning instrument is the Randwick Local Environmental Plan 1998 (Consolidated) (the LEP). The LEP zones the whole RRR site is Zone 6A – Open Space and identified as a ‘heritage conservation area’. An extract of the zoning map which indicates both the site’s zone and heritage conservation status is provided below:

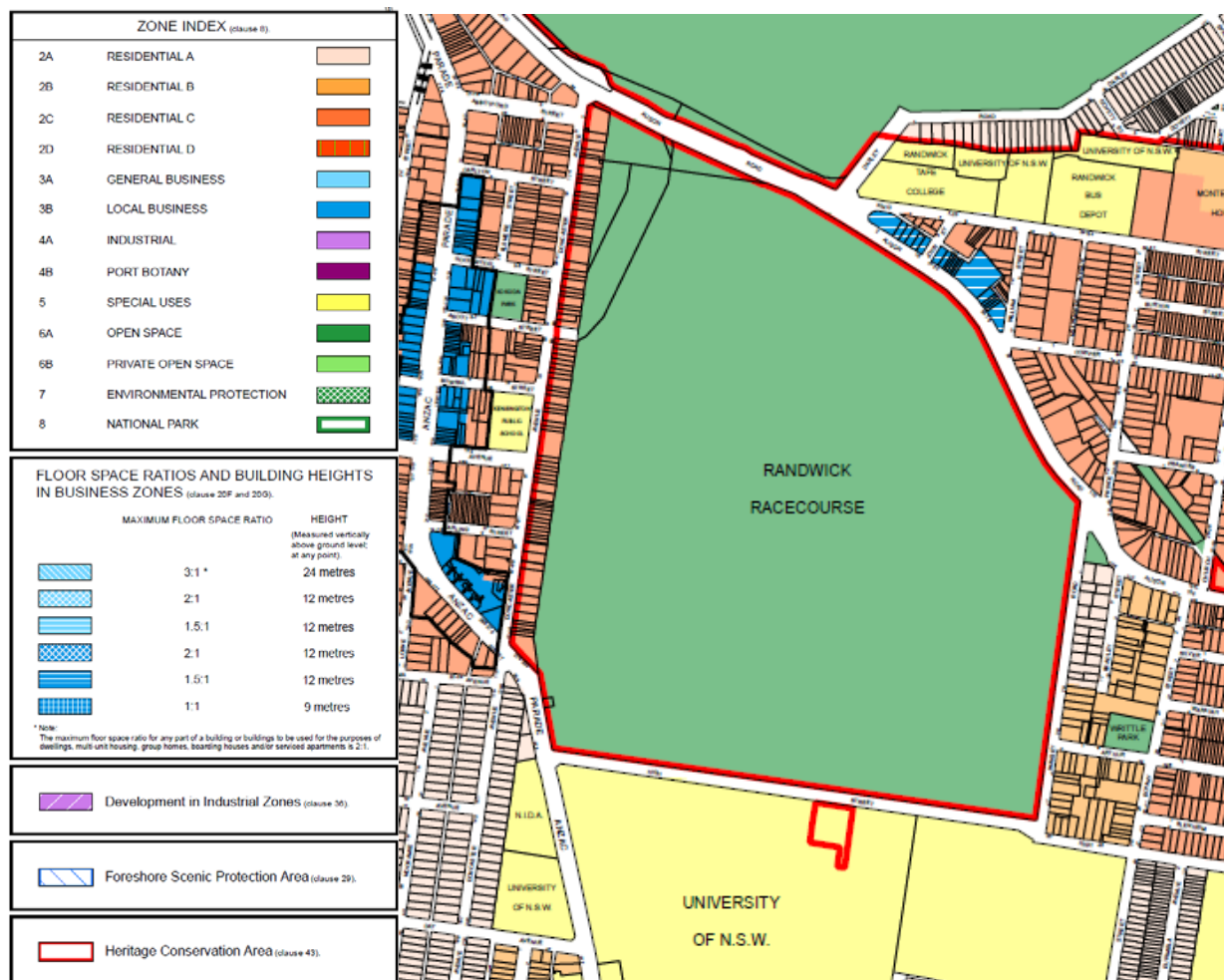


Figure 4 – Randwick LEP 1998 Zoning Map Extract

Source: Randwick Council website, last amended 15 January 2010.

Clause 18 provides the Zone 6A objectives and permissible uses, which includes with development consent ‘recreation facility’, which is defined in Clause 49 as:

recreation facility means a building or a work used for a sporting, exercise or leisure activity, and includes golf courses, racecourses, showgrounds, bowling greens, tennis courts and the like, including any ancillary club building, but (in Part 2) does not include a building or work elsewhere defined in this clause. (our emphasis added)

As the stables are a key racecourse facility providing housing and training facilities for horses, the proposal is permissible on the RRR site with development consent.

Other relevant controls in LEP include:

- Clause 22 Services – Council must be satisfied that the site is adequately serviced by sewerage/drainage and water.
- Clause 28 Tree Preservation Order – Council must make an assessment of the importance of trees prior to their removal.
- Clause 38 Development on Open Space Zones – Enables the permissible uses within the 6A Open Space Zone to be expanded to permit developments which are in accordance with a management plan. Clause 38 does not provide for any additional permissible uses at RRR as no management plan has been prepared and adopted under this LEP provision.
- Clause 40 Earthworks – Council must consider impact upon drainage pattern and earth stability.
- Clause 40A Site Specific Development Control Plan – for sites larger than 10,000m², a DCP must be prepared. A site specific Development Control Plan (DCP) has been prepared in accordance with Clause 40A, and includes a range of development controls guiding development of the RRR.
- Clause 42B Contaminated Land – Council must consider whether land is contaminated and remediated appropriately.
- Clause 43 Heritage Conservation – Consent is required for works to or demolition of a heritage item and assessed against the relevant heads of consideration. It is noted that the RRR site is listed as a Heritage Conservation Area.

4.2 Draft Randwick Comprehensive Local Environmental Plan

Randwick City Council is currently undertaking a number of reviews of various components of the existing LEP. The review for Open Space and Environment is underway and will form part of the new comprehensive LEP. Details of the future provisions relating to the site have not been publicly available and therefore cannot be commented upon.

4.3 Local Planning Policies

4.3.1 Royal Randwick Racecourse Development Control Plan

The Royal Randwick Racecourse Development Control Plan (RRR DCP) was adopted by Randwick Council on 8 May 2007, and provides site specific development controls to fulfil the requirements of Clause 40A of the LEP.

The provisions of the RRR DCP will be considered through the design development process and will be addressed in the Environmental Assessment Report.

5 Requirements of Major Project SEPP

5.1 State Environmental Planning Policy (Major Development) 2005

Schedule 1 of SEPP (Major Development) lists the types and classes of development that may be considered as Part 3A projects.

The relevant type or class for this project is listed in 'Group 6 – Tourism and recreational facilities', which identifies the development to be a development relating to:

15 Major Sporting Facilities

(2) Development for the purpose of major sporting facilities that:

(a) has a capital investment value of more than \$30 million, or

As the stables are a fundamental component of a racecourse, and the proposed Stable Precinct works outlined in **Section 3.2** of this report will have a capital investment value of approximately \$50 million, the proposal falls within the ambit of the SEPP (Major Development) and is a development to which Part 3A of the *EP&A Act* applies.

5.2 Capital Investment Value

In accordance with Schedule 1, Clause 15 of the Major Development SEPP, development for the purpose of a major sporting facility must have a minimum capital investment value of \$30 million.

The Capital Investment Value (CIV), as defined in the SEPP, has been determined by Ralph Beattie Bosworth and their assessment the CIV for the project is **\$49.1 million**, and therefore exceeds the Major Development SEPP CIV threshold.

A copy of the advice from Ralph Beattie Bosworth is included at **Appendix A**.

6 Preliminary Environmental Assessment

6.1 Introduction

Stable facilities have been situated on the RRR site for over 100 years and have been replaced and reconfigured as the use of the RRR site has evolved over time. The proposed Stable Precinct redevelopment aims to consolidate the stabling facilities which are dispersed across the RRR site and within surrounding street blocks, to a single precinct. .

The stable redevelopment aims to deliver state-of-the-art stable facilities to promote RRR as an international standard racecourse, employing modern and innovative stable and training facilities to complement the improvements to the Spectator Precinct, proposed as a separate project application.

This section of the report seeks to identify the likely key issues to be addressed as part of the further development of the design and the preparation of the detailed environmental assessment report.

6.2 Access, Traffic and Parking

The Stable Precinct is currently serviced from Gate 10 Wansey Road. The entry and exit design will enable all vehicles to enter and exit in a forward direction, and will remain substantially unchanged to the current accessing arrangements.

The Stables Precinct will include parking for both passenger vehicles and horse-floats to meet the anticipated demand.

While the precinct will accommodate all the existing stabling facilities on site, overall traffic and parking is anticipated to remain unchanged, as existing stables will be decommissioned as new facilities are constructed. Further, the traffic impacts of the stable activities are anticipated to be reduced, as existing access off High Street will be relocated, therefore easing congestion on this road.

A detailed analysis of access and parking capacity relative to the proposed use will be undertaken as part of the environmental assessment report.

6.3 Heritage and Archaeological Impacts

The entire RRR site is listed as a Heritage Conservation Area. In designing the Stable Precinct development consideration has been given to the heritage value and function of buildings and the racecourse use itself.

The Officials Stand (aka Members Stand) building is the only heritage listed building on the site, and the design of the stables will be sympathetic to the visual association with this building. A heritage impact statement will be prepared as part of the environmental assessment report which will respond to the heritage conservation context and guide the built form, colours and finishes and landscaping of the precinct.

6.4 Landscaping and Trees

The street frontages of the Stables Precinct are densely landscaped with a range of mature trees which will be retained as part of the Project Application. Some trees within the Stable Precinct will need to be removed, however all significant trees will be retained and all trees to be removed will be replaced. A comprehensive landscape plan design will be prepared as part of the Project Application which will replace trees to be removed and integrate the Stables Precinct with the wider RRR site.

6.5 Stormwater Drainage

A new stormwater concept will be prepared as part of the proposal and included with the environmental assessment report, and will drain into the existing detention basin to the south of the Stables Precinct.

6.6 Visual Impact

The consolidation and redevelopment of the Stables Precinct will result in a modern architectural built form, providing state-of-the-art equine facilities, which will improve the visual presentation of the stable facilities across the RRR site.

The built form will have regard to the key vantage points of the stable facilities from both off-site and on the RRR site. It is noted that due to the topography, existing landscaping surrounding the Stable Precinct, and the generous separation the Precinct has from surrounding development, the stable buildings will be substantially screened from off-site vantage points. The most prominent vantage point for the stables will be from the Spectator Precinct, which is approximately 1 km north of the stables.

In general, the scale and character of the proposed stable structures sits comfortably within the racecourse context and the surrounding land use context. The proposed development will represent an improvement in the quality of the design and presentation of these stable structures, and will enable dilapidated stable structures along High Street to be decommissioned as new facilities are built.

A visual impact assessment of the proposed development will be included in the environmental assessment.

6.7 Amenity Impacts

6.7.1 Acoustic Impact

The proposed works will not change the underlying function of the Stables Precinct, although will intensify the use of this precinct. The environmental assessment will have regard to the acoustic impacts of the development on the residential area on the eastern side of Wansey Road, however it is noted that the physical characteristics of the site will act to mitigate acoustic impacts including:

- Changes in topography between surrounding residential developments and the Stable Precinct.
- Existing mature landscaping.
- Generous setbacks between Wansey Road and the proposed stable buildings.

These existing features will minimise the acoustic impacts of the intensified use of this precinct.

6.7.2 Air Quality

The proposed works will not change the underlying function of the Precinct. The intensified use of the precinct and the additional horses accommodated within the precinct is not expected to adversely impact off-site air quality due to the setback and vegetation separating the proposed development from surrounding uses.

An air quality assessment will be included as part of the environmental assessment and include measures to mitigate any adverse air quality impacts.

6.8 Contamination

A preliminary contamination report will be submitted with the environmental assessment report to ensure that any contamination is appropriately remediated.

6.9 Services

6.9.1 Sewer

The proposed works will dispose sewage into the existing sewer system and the internal network will be upgraded as necessary. Consultation will be undertaken with the relevant service agency to ensure that infrastructure and capacity is appropriately addressed.

6.9.2 Water

Consultation will be undertaken with the relevant service agency to ensure that the existing system will be appropriately amplified to serve the proposed works.

6.10 ESD

The proposed upgrade works will include construction of environmentally sensitive features to ensure that water and energy use is minimised. The environmental assessment report will detail the measures intended to improve the environmental sustainability of the Precinct.

The ESD measures likely to be employed include:

- Stormwater reuse
- Solar water heating
- Water sensitive stormwater design
- Recycling of building materials.

6.11 Consultation

To date, a preliminary briefing has been held with Department of Planning officers to discuss the proposal. In addition, the proponent has had several meetings with Randwick Council and the University of New South Wales over a considerable time period. UNSW have been involved in a more comprehensive preliminary consultation process, as the principle surrounding landholder.

A more comprehensive consultation process will commence once the Clause 6 declaration has been made and the environmental assessment documentation is being formulated, however the formal consultation process will occur during the Environmental Assessment process.

6.12 Social and Economic Impacts

The RRR use is an established part of Sydney's social and cultural history, and provides Sydney's most centrally located stabling and horseracing facilities. The stable and training facilities are an essential part of providing a world-class racecourse facility, while the racecourses location makes accessing these facilities more attainable to intercity residents, creating a cultural interest in horse racing, riding, training and breeding.

The financial investment injection of \$50 million to up-grade the existing stable facilities will generate new full-time jobs in the construction and equine industries, as well as protect existing racecourse employment, and improve work conditions for stable hands, trainers and strappers.

6.13 Operational

By consolidating the stable facilities from within and surrounding the RRR, operations of the RRR will be improved as fewer horses will need to cross perimeter roads to access the training facilities.

The environmental assessment will address the operational improvements of the proposed stable redevelopment, and demonstrate an overall net improvement in the operations of the RRR.

6.14 Waste Management

A comprehensive waste management plan will be prepared as part of the environmental assessment package. This plan will aim to minimise waste and will detail measures to address waste disposal through the demolition, construction and on-going operation of the facility.

7 Summary & Conclusions

The proposed redevelopment and consolidation of the Stable facilities of the RRR will assist in financially securing the on-going use of the site, and re-elevating the site to become a racecourse with international recognition and able to host world-class horse racing events, as well as the training of horses which are of international pedigree. The proposal forms part of a comprehensive vision for the site and is an essential initial step in the process of ensuring the Racecourse once again becomes a world class facility.

This report has been prepared to provide the Department of Planning with an understanding of the proposed project and including an initial identification and assessment of matters to be assessed in the project application.

The proposal will generally result in a similar number of stables being accommodate on the site and within the surrounding areas, however will consolidate the facilities into a single location, facilitating efficiencies and enabling higher standard materials and structures to be incorporated through making the facilities accessible to a larger number of horses and trainers.

AJC is willing to work with all key stakeholders during the assessment process in order to achieve the most optimal outcome for all concerned.

In accordance with Clause 6 of State Environmental Planning Policy (SEPP) – Major Development, and under the provisions of the Part 3A provisions of the Act, we formally seek the Minister's confirmation that the proposal is to be declared a Major Project.

We also request the Director-General issue Environmental Assessment Requirements for the proposal to assist in the preparation of the Environmental Assessment documentation for the Project Application.

Appendix A Quantity Surveyors Report

Appendix B Architectural Plans

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