

Department of Planning and Environment

Our ref: DOC22/265308
Your ref: SSD 8706

Rodger Roppolo
Senior Planning Officer
Infrastructure Assessments
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Subject: Response to additional information - Night Racing at Royal Randwick Racecourse (SSD 8706)

Thank you for your email received 1 April 2022 requesting comments from the Environment and Heritage Group (EHG) on the additional information submitted in relation to the subject proposal.

To address the outstanding SEARs relating to assessment requirements under the *Biodiversity Conservation Act 2016* the proponent has requested a waiver to the requirement to submit a Biodiversity Development Assessment Report (BDAR). The request was supported by a BDAR Waiver Report prepared by Urbis, dated 30 March 2022 and the previously submitted Biodiversity Impact Statement prepared by Cumberland Ecology (dated 30 November 2021).

With consideration to the findings and recommendation of these reports, a waiver was issued on 13 April 2022.

In previous advice dated 3 March 2022, EHG provided recommended conditions of approval relating to the management of biodiversity matters arising from the proposal. The recommendation to apply these conditions is not altered by the BDAR Waiver. The recommended conditions of approval can be found at Attachment 1.

In relation to flooding, EHG's previous advice recommended comment be sought from the NSW SES in relation to flood emergency management measures for the proposal. The proponent has suggested a condition of approval be applied to address this requirement. Accordingly, a recommended condition of approval has been provided at Attachment 1.

Should you have any queries regarding this matter, please contact Shaun Hunt, Senior Conservation Planning Officer via shaun.hunt@environment.nsw.gov.au or 02 8275 1617.

Yours sincerely,



14/04/22

Susan Harrison
Acting Director
Greater Sydney Branch
Biodiversity and Conservation

Attachment 1: Recommended Conditions of Approval for proposed Night Racing at Royal Randwick Racecourse (SSD 8706)

Grey-headed Flying-foxes management measures

Lighting

- Dimming of racecourse lighting between races, to minimise the impacts of light spill through a reduction of the duration of full brightness of the lighting to approximately 8.5 hours per racing season.
- Implementation of design features such as baffles and shields to reduce the lighting levels and minimise the light spill.
- Incorporation of best practice and latest technology into the proposed design of the lighting to minimise the light spill on surrounding areas within acceptable levels.

Monitoring program

An ecological monitoring program is to be developed and implemented to monitor the Grey-headed Flying-fox colony at Centennial Park and to inform the implementation of an Adaptive Management Strategy. The Monitoring program and Adaptive Management Strategy are to be prepared in accordance with the recommendations of sections 5.2 and 5.3 of the Biodiversity Impact Statement prepared by Cumberland Ecology (30 November 2021) and are to be in place prior to any Night Racing events taking place.

Tree Retention and Protection

- Trees on site are to be protected during all works in accordance with Australian Standard 4970- 2009 Protection of Trees on Development Sites and the recommendations of the Arboricultural Impact Assessment prepared by Bradshaw Consulting Arborists (dated, 15 February 22).
- Excavation for post/column footings or services within the Tree Protection Zone of trees to be retained should be undertaken using minimally destructive techniques such as hand-digging, compressed air or water-jetting, or non-destructive techniques. A minimum AQF Level 5 Arborist must be on site to supervise all works within the Tree Protection Zone. Where tree roots are encountered, they should be managed in the following manner:
 - For roots greater than 60mm in diameter, the location of proposed works should be amended to avoid impacting these roots.
 - For smaller roots, where root pruning is necessary, all cuts should be clean cuts using sharp tools such as secateurs, pruners, handsaws, chainsaws or specialised root pruning equipment. All root pruning must be done in accordance with Section 9 of Australian Standard 4373-2007 Pruning of Amenity Trees.

Flood Emergency Management Plan

- The proponent is to consult with the NSW SES on the preparation of a flood emergency management plan including community education and awareness to ensure that occupiers and owners at the racecourse are educated on the potential flood risk within and outside the vicinity of the racecourse, before, during and after a flood event.

End of Submission