



SSDA SCOPING REPORT

Non-Race Day Events, Royal
Randwick Racecourse

Prepared for
AUSTRALIAN TURF CLUB
December 2020



URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

Director	Sarah Horsfield
Consultant	Eliza Scobie
Project Code	P26563
Report Number	Final

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

© Urbis Pty Ltd
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

urbis.com.au

CONTENTS

1.	Introduction	1
2.	Project Overview	2
	2.1. Site Description	2
	2.2. Regional Context	3
	2.3. Local Context	4
	2.4. Site Background.....	4
3.	Project Description	7
	3.1. Overview	7
	3.2. Capital Investment Value	8
	3.3. Project Justification and Alternatives	8
4.	Planning Framework	10
	4.1. Statutory Planning Context	10
	4.1.1. Environmental Planning and Assessment Act 1979	10
	4.1.2. State Environmental Planning Policy (State and Regional Development) 2011	10
	4.1.3. State Environment Planning Policy (Infrastructure) 2007	10
	4.1.4. Randwick Local Environmental Plan 2012	11
	4.2. Strategic Planning Context	11
5.	Key Issues for Consideration	12
	Compliance with Strategic and Statutory Plans.....	12
6.	Requested Waivers	15
	6.1.1. Biodiversity Development Assessment Report	15
	6.1.2. Aboriginal Cultural Heritage Assessment Report	15
7.	Engagement	16
8.	Expected Deliverables	17
9.	Conclusion	18
	Disclaimer	19

FIGURES

Figure 1 Application Site	2
Figure 2 Site Context	3

1. INTRODUCTION

This Scoping Report has been prepared by Urbis on behalf of the Australian Turf Club (**ATC – the Proponent**) regarding a proposal to accommodate non-race day events at Royal Randwick Racecourse (**Randwick Racecourse**).

In accordance with Part 4 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*, this Scoping Report forms a formal request for Secretary's Environmental Assessment Requirements (**SEARs**) to guide the preparation of a State Significant Development Application (**SSDA**) for the proposed development at the Randwick Racecourse, which is legally described as Lot 2009 in Deposited Plan 1169042 (**the site**).

The proposal is classified as State Significant Development (**SSD**) on the basis that it falls within the requirements of clause 4(b) of Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP)*, being 'development on land identified as being within the Royal Randwick Racecourse Site if it is for the purposes of an event that is not a race day event'. The Racecourse is identified as a state significant site in the SRD SEPP as it is arguably one of the key recreational, event and entertainment sites in Sydney and NSW.

Royal Randwick Racecourse has an extensive history within Australia's recreational culture for over 150 years. The Racecourse has a history of hosting a variety of racing and non-racing events over a number of years, including in more recent years a number of major non race day events. A number of development consents for non-race day events at the site have been issued by Randwick City Council and DPIE. Many of these development consents were issued for one off events. ATC's aspiration is to broaden the scope of the existing non-race day event approvals (MP10_0097 SSD MOD 2 which allows for minor non-race events/functions up to 5,000 patrons, and SSD-6134-2012-MOD 1 which permits an annual music festival in March for up to 50,000 patrons). The existing valid SSDA's which apply to the site, currently impose limitations on the type, capacity, number and timing of non-race day events held at the site.

A key desired outcome for ATC is to obtain a more flexible development consent for holding a variety of non-race day events on the site. This will allow the ATC to diversify its business and revenue stream in response to these challenging times, as a result of the COV-ID 19 pandemic. It will also allow the multi-use of the open space of the Racecourse that would otherwise be off limits to the public other than on a race day or other special events. ATC also want to reinforce the reputation of the site as a world class venue for large-scale sporting and recreation activities by accommodating a variety of non race day events, festivals and the like of varying size throughout the year.

The proposal will seek approval for the use of land and buildings within the Spectator and Infield Precinct of the Randwick Racecourse for various events and functions on non-race days. A total of 17 events are proposed annually and on an on-going basis. These non race day events will remain secondary to the core use of the site as a horse racing facility which will take precedence throughout the year. Further, these non-race day events will utilise the excellent existing public transport and infrastructure available at the Racecourse, with special transport and management procedures to ensure events run smoothly and with minimal amenity impact to surrounding residents.

This ATC will not be seeking approval for non-race day events of a patronage capacity of less than 5,000 patrons, as these events are already permitted via Schedule 2 of the *Randwick Local Environmental Plan 2012 (Randwick LEP 2012)* and Major Project Approval MP10_0097 Mod 2.

This Scoping Report has been prepared following an initial scoping meeting with the Department of Planning, Industry and Environment (**DPIE**) on 3 December 2020. This meeting informed the preparation of this Scoping Report and the refinement of the project scope in response to DPIE feedback. The purpose of this report is to provide information to support the request to the Secretary. To assist with the Department's understanding of the proposal, the following information is provided:

- An overview of the site and context.
- Description of the proposed development.
- An overview of the relevant planning framework and permissibility.
- Identification of key planning considerations associated with the proposal.
- Expected documentation deliverables.
- An overview of the stakeholders to be engaged with at various stages throughout the process.

2. PROJECT OVERVIEW

2.1. SITE DESCRIPTION

Royal Randwick Racecourse is located in the Randwick Local Government Area (**LGA**). The site is legally described as Lot 2009 in Deposited Plan 1169042 and is Crown Land, leased to ATC whom manage and operate the racecourse.

The proposed non race day events will be held in the Spectator Precinct and the Infield Precinct within the broader Royal Randwick site. These precincts are defined in the former Part 3A Project Approval MP08_0092 (and MOD1), and the Major Project Approval MP10_0097 (and MOD 1 and 2), as illustrated in **Figure 1**.

The Spectator Precinct accommodates Royal Randwick's spectator, entertainment and convention facilities, and comprises a concentration of buildings/structures, a number of which are significant in heritage and landscape terms. This area accommodates the Queen Elizabeth II Stand and future Winx Stand, which is currently under construction (refer SSD-10285). Access and egress infrastructure such as the exclusive bus way and taxi terminal have been designed and constructed to facilitate a crowd of up to 55,000 people.

The Infield Precinct comprises a grassed area and hard stand in the centre of the racetrack that is primarily used for morning horse training sessions and for carparking on race-days. Access to the infield is via the vehicle tunnel off High St running below the track surface. From the infield there is access to the Spectator Precinct via the pedestrian tunnel.

This proposal relates to the use of the Spectator and Infield precincts only.

Figure 1 Application Site



Source: Urbis

2.2. REGIONAL CONTEXT

Royal Randwick Racecourse is one of the largest recreation areas in the highly urbanised Eastern Suburbs of Sydney. It is located within a major open space and entertainment precinct that includes a range of passive and active recreation areas and sporting facilities, comprising Moore Park Golf Course, the Moore Park Sport Precinct (including Sydney Cricket Ground and Allianz Stadium), the Entertainment Quarter and Centennial Park.

The site is strategically significant due to its proximity to a number of key Sydney features including:

- Coogee Beach – 3km
- Bondi Beach – 5km
- Sydney Airport – 6km
- Sydney CBD – 6km
- UNSW and Prince of Wales Hospital – immediately adjacent

The Racecourse is also directly adjacent to the CBD and South East Light Rail (CSELR). There is a new light rail station directly opposite the existing Alison Road entry to the Racecourse and the site is within easy walking distance of both the L2 Randwick and L3 Kensington lines. The CSELR has been a gamechanger for public transport in the precinct, linking major recreation, education, commercial and residential areas between the Eastern Suburbs and Sydney CBD.

Figure 2 Site Context



Source: Urbis

2.3. LOCAL CONTEXT

The racecourse has an interface with several different localities each with a distinct character, including:

- **North** – Centennial Park directly opposite the site, on the opposite side of Alison Road.
- **East** – predominantly residential area, with frontage to Wansey Road. This area is elevated above the level of the racecourse but views across the racecourse are well screened by a row of mature fig trees. Further east – Randwick shopping village is approximately 1.5km away.
- **South** – the University of NSW is located along the entire southern boundary of the site fronting High Street.
- **South east** – the Prince of Wales Hospital is located less than 1km away.
- **West** – residential area consisting of a mix of one and two storey single dwellings and three storey residential flat buildings. Further west – Kensington village shopping strip located along Anzac Parade.

The key corridors within the south-eastern subregion include Anzac Parade which runs along the western side of the racecourse, and Alison Road running along the eastern side of the racecourse. Each of these roads provide key corridors linking the eastern suburbs to the Sydney CBD.

The site is well serviced by bus routes along Anzac Parade and Alison Road. Anzac Parade has a high frequency of services, which service surrounding suburbs and the University of NSW. It should be noted that at approximately 10pm (when the night racing is proposed to finish), bus service frequency is approximately every 10 - 20 minutes for services between Royal Randwick Racecourse and Central Station.

The CSELR provides a high frequency service connecting key locations within the Sydney CBD, and landmarks including Moore Park, Royal Randwick Racecourse, University of New South Wales, Kingsford, and Randwick. The site is serviced by three new light rail stations, one on Alison Road opposite the Gate 1 entry to the ATC Spectator Precinct, one on Wansey Road and one on the Kensington Line on Anzac Parade. Key feature of the CSELR are:

- Regular services running every 4-8 minutes between Circular Quay and Moore Park, and every 8-12 minutes between Moore Park and Randwick and Kingsford in the 7am-7pm peak on weekdays.
- It operates seven days a week, 5am through to 1am (next day).

2.4. SITE BACKGROUND

A number of development consents for non-race day events at the site have been issued by Randwick Council and DPIE. Where non-race day event applications were approved as local DAs by Randwick City Council, this is due to the issuing of these consents prior to the classification of the site as a 'State Significant precinct' under the SRD SEPP.

An overview of these consents is outlined in **Table 2**.

Table 1 Approval History

Approval	Summary
DA 904/2005	On 1 February 2006, Randwick City Council granted approval for a one-day event 'Future Music Festival' with a capacity of 10,000 patrons from 12 noon until 10pm. This was a one-off event and the DA is no longer valid.
DA 74/2007	On 14 March 2007, Randwick City Council granted approval for a one-day event 'Future Music Festival' with a capacity of 15,000 patrons. The approved hours of operation were from 12 noon until 10pm. This was a one-off event and the DA is no longer valid.

Approval	Summary
DA 987/2007	On 5 March 2008, Randwick City Council granted approval for a one-day event 'Future Music Festival' with a capacity of 35,000 patrons. The approved hours of operation were from 12 noon until 10pm. This was a one-off event and the DA is no longer valid.
DA 694/2008	On 25 November 2008, Randwick City Council granted approval for a one-day event 'Future Music Festival' with a capacity of 25,000 patrons from 2pm to 10pm. A Section 96 (now Section 4.55) modification application was later submitted to increase the patronage numbers to 35,000 and increase the hours of operation from 12 noon to 10pm. A Section 97 (now Section 8.7) modification application was later approved by the Land and Environment Court on 19 February 2009, increasing the patronage numbers to 35,000. This was a one-off event and the DA is no longer valid.
DA 873/2009	On 9 February 2010, Randwick City Council granted approval for a one-day event 'Future Music Festival' with a capacity of 38,000 patrons from 12 noon until 10pm. This was a one-off event and the DA is no longer valid.
DA 851/2010	On 7 December 2010, Randwick City Council granted approval for a one-day event 'Future Music Festival' with a capacity of 42,000 patrons from 12 noon until 10pm. This was a one-off event and the DA is no longer valid.
MP10_0097 MOD1 and MOD2 Non-race day event	<p>On 7 February 2011, the Planning Assessment Commission (PAC) (on behalf of the Minister of Planning), granted Major Project Approval MP10_0097 for the redevelopment of the Royal Randwick Racecourse Spectator Precinct. The project was modified under MP10_0097 MOD 1 on 25 February 2012.</p> <p>On 4 April 2013, MP10_0097 MOD 2 was approved which granted consent for the continued use of the Spectator Precinct for non-race day events, provision of a restaurant uses and adjustment of precinct boundaries. This approval granted consent for the use of "land and buildings" for minor non-race day events on the Spectator and Infield Precinct which meet the conditions of the approval. A separate Development Application is required to be submitted to and approved by the Department with regard to any non-race day events/functions beyond the scope of this approval.</p>
SSD 4995-2011 Music festival	On 8 February 2012, the PAC (on behalf of the Minister of Planning), SSD Approval 4995-2011 for a temporary one-day music festival from 12 noon – 10pm at the Royal Randwick Racecourse, with a capacity of 45,000 patrons. This was a one-off event and the SSDA is no longer valid.
SSD-5394-2012 Music festival	On 1 February 2013, the Director-General of the Department of Planning and infrastructure (on behalf of the Minister of Planning) granted SSD Approval 5394-2012 for a temporary musical event on 9 March 2013, known as 'Future Music Festival'. This was a one-off event and the SSDA is no longer valid.
SSD-5394-2012-MOD 1 Music festival	On 6 March 2013, an amendment to SSD-5394-2012 was approved to grant consent for an additional music event the day after on Sunday 10 March 2013, known as 'Good Life'. This was a one-off event and the SSDA is no longer valid.

Approval	Summary
SSD 6134-2013 Music festival	On 5 March 2014, the Minister of Planning granted SSD Approval 6134-2013 for a two-day music festival for the second weekend of March every year for a total of ten years. The consent was granted for 10 years and lapses on 5 March 2024.
SSD-6134-2013 MOD 1 Music festival	On 27 November 2014, a Section 4.55(1)(A) modification application to amend the description of SSD-6134-201313 was approved. The application sought to amend the wording of the consent from permitting an event in the “second weekend of March every year...” to permitting an event “about the beginning of March every year...”. This modification sought to provide additional flexibility in the scheduling of events each year.

3. PROJECT DESCRIPTION

3.1. OVERVIEW

This proposal will seek approval for the use of land and buildings within the Spectator and Infield Precinct of the Randwick Racecourse for various events, festivals and functions on non-race days. A total of 17 events are proposed annually. The proposal may involve the erection of temporary structures including stages, marquees, screens, and ancillary buildings typically found at the type of events.

The proposed non-race day events are consistent with the use of the site as a *recreation facility (major)*, the historical use of the site and the character of the precinct. The site has accommodated a number of non-race day events under previous approvals as outlined in **Section 2.4**.

Proposed patronage has been determined by event research, ATC event forecasting and the event tiers identified for Randwick Racecourse in the draft *Special Event Travel Management Plan* currently being developed by TfNSW for the Moore Park and Randwick precinct. Whilst this plan remains in draft format, these patron categories have been adopted to align with stakeholder planning for the precinct and to provide direction on traffic and transport management. The hours of operation are proposed in accordance with the existing liquor licence, previous consents and the NSW Environment Protection Authority *Industrial Noise Policy (INP)*.

The ATC will not be seeking approval for non-race day events of a patronage capacity of less than 5,000 patrons, as these events are already permitted via Schedule 2 of the Randwick LEP 2012 and Major Project Approval MP10_0097 Mod 2.

The non-race day events proposed are detailed in **Table 3**.

Table 3 Proposed scope

Class of Event	Type of Event	Number of Events	Duration	Capacity (per day)	Hours of Operation
1 (Category R1)	Festival, function, cultural, arts, or community events.	3	1 to 2 days	Up to 7,500pax	<ul style="list-style-type: none"> ▪ 10am – 10.30pm ▪ Friday, Saturday and public holiday: 10 – 10:30pm ▪ Sunday: 10-10pm
2 (Category R2)	Festival, function, cultural, arts, or community events.	3	1 to 2 days	7,500 - 10,000 pax	<ul style="list-style-type: none"> ▪ Monday – Thursday: 10am – 10.30pm ▪ Friday, Saturday and public holiday: 10 – 10:30pm ▪ Sunday: 10-10pm
3 (Category R2)	Festival, function, cultural, arts, or community events.	5	1 to 2 days	10,000 - 25,000 pax	<ul style="list-style-type: none"> ▪ Monday – Thursday 10am – 10.30pm ▪ Friday, Saturday and public holiday: 10 – 10:30pm ▪ Sunday: 10-10pm
4	Festival, function, cultural,	5	1 to 2 days	25,000 - 30,000pax	<ul style="list-style-type: none"> ▪ Monday – Thursday 10am – 10.30pm

Class of Event	Type of Event	Number of Events	Duration	Capacity (per day)	Hours of Operation
(Category R2)	arts, or community events.				<ul style="list-style-type: none"> ▪ Friday, Saturday and public holiday: 10 – 10:30pm ▪ Sunday: 10-10pm
5 (Category R3)	Festival, function, cultural, arts, or community events.	1	1 to 2 days	30,000 - 50,000pax	<ul style="list-style-type: none"> ▪ Monday – Thursday 10am – 10.30pm ▪ Friday, Saturday and public holiday: 10 – 10:30pm ▪ Sunday: 10-10pm

3.2. CAPITAL INVESTMENT VALUE

The cost of works for erection of temporary structures to support non race day events will be less than \$10 million per event. This will be refined for submission of the SSD application.

3.3. PROJECT JUSTIFICATION AND ALTERNATIVES

The key reasons for seeking the non race day events consent are outlined below:

- The ATC has demonstrated previously that they have the capability to successfully deliver major race day and non-race day events at the Racecourse. This is an efficient use of the land.
- The current practice of obtaining separate SSD approvals for each non race day events greater than 5,000 patrons is a timely and cost-consuming process. It is an inefficient use of ATC and DPIE resources. This approval will alleviate the need for continued SSDAs for non race day events being sought from DPIE.
- This approval will allow ATC to be agile to respond to market opportunities for non race day events and the approval will create greater certainty for the community when events are approved, rather them being approved on an ad hoc basis.
- The approval will utilise and promote Randwick Racecourse as a location for premium cultural and festival events other than just premium sporting events. The multi-purpose use of the site is in aligned with Randwick Local Strategic Planning Statement and will enable the use and enjoyment of the private open space site by a wide spectrum of the community.
- The use of the site for non-race day events will not undermine the primary use of the precinct as a horse racing and horse training venue. Non-race day events will not conflict with the regular operations, or race day scheduling including the Spring Racing Carnival, Everest Carnival and Autumn Carnival.
- The approval of this request is essential to ATC, particularly in a post-COVID era to stimulate economic activity and provide safe outdoor events for the broader community enjoyment in which social distancing can easily be achieved.

The proponent has considered use of the site under the existing non-race day event framework. However, this is not considered a viable solution as follows:

- The existing SSD-6134- 2013 MOD 1 restricts the use of the site for a non-race day event to within two weekends per year. This does not provide the flexibility ATC requires in accommodating a range of events and is unnecessarily restrictive with regard to the remaining available weekends of the year.
- The existing MP10_0097 MOD1 and MOD2 does not permit events greater than 5,000 patrons. Consultation with event coordinators indicates a greater level of patron capacity is required for commercial viability and event diversification, without which coordinators will utilise alternative venues within the Greater Sydney region. This will result in a loss of economic activity and positive externalities

in the Randwick LGA. It is further noted that whilst the project seeks a notable increase in patron capacity, the site is designed and constructed to accommodate crowds of up to 55,000 people.

Accordingly, the establishment of a non-race day events framework with a strong events management procedure is the most appropriate solution for the site.

4. PLANNING FRAMEWORK

4.1. STATUTORY PLANNING CONTEXT

The relevant statutory planning policies that apply to the project are as follows:

- *Environmental Planning and Assessment Act 1979*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP)*
- *Randwick Local Environmental Plan 2012.*

A brief overview of these statutory planning policies in relation to the project is outlined below.

4.1.1. Environmental Planning and Assessment Act 1979

The EP&A Act provides the framework for environmental planning in NSW and include provisions to ensure that proposals that have the potential to impact the environment are subject to detailed assessment and provide opportunity for public involvement.

This development is proposed under Part 4 of the Act, Division 4.1 State significant development, Section 4.38 and is subject to the Minister's consent.

The Minister of Planning and Public Spaces is the consent authority for SSDA. The Minister may delegate this function to staff within the DPIE. Notwithstanding, the Independent Planning Commission (**IPC**) will be the consent authority in the following circumstances:

- The application is not supported by the relevant Council;
- The Department has received more than 50 unique public objections, or
- The application has been made by a person who has disclosed a reportable political donation in connection with the development application.

4.1.2. State Environmental Planning Policy (State and Regional Development) 2011

Pursuant to Schedule 2 Clause 4 of the SRD SEPP, the proposed development is considered SSD as identified below:

4 Development at Royal Randwick Racecourse

Development on land identified as being within the Royal Randwick Racecourse Site on the State Significant Development Sites Map if—

- (a) it has a capital investment value of more than \$10 million, or*
- (b) it is for the purposes of an event that is not a race day event.*

As the project is for the purposes of non-race day events at Royal Randwick Racecourse, it classifies as SSD for the purposes of the EP&A Act. It is noted that clause 11 of SRD SEPP states that Development Control Plans (**DCPs**) do not apply to SSDAs.

4.1.3. State Environment Planning Policy (Infrastructure) 2007

The relevant matters for consideration in the Infrastructure SEPP include referral requirements for development. Clause 101 of the Infrastructure SEPP outlines matters for consideration related to sites with a frontage to a classified road. The racecourse site has frontage to Anzac Parade and Alison Road, which are classified roads. The site has various access points to both roads, and the project will utilise these. Whilst there are no proposed changes to the access points, the timing, volume and frequency of vehicle access to the site may change. These requirements will be addressed and detailed in the EIS.

Clause 104 of the Infrastructure SEPP relates to 'traffic generating development' that is development listed in Schedule 3 and requires that this development be referred to the Roads and Maritime Services (RMS) for comment. This includes certain tourist facilities, recreation facilities, showgrounds or sportsgrounds with capacity for more than 200 motor vehicles. Due to this requirement, it is anticipated the proposal is likely to trigger the need for referral to RMS under the ISEPP.

4.1.4. Randwick Local Environmental Plan 2012

The Randwick LEP 2012 is the principle environmental planning instrument applying to the site. The site is zoned RE1 – Public Recreation and is identified as a Heritage Conservation Area (HCA) 'Racecourse' (Item C13) pursuant to Schedule 5 of the Randwick LEP 2012. The site also contains a local heritage item, being the 'Members Stand' (Item 249).

The project continues the existing land use on site, being *recreational facility (major)*, and is consistent with the objectives of the zone including:

- *To enable land to be used for public open space or recreational purposes.*
- *To provide a range of recreational settings and activities and compatible land uses.*
- *To protect and enhance the natural environment for recreational purposes.*
- *To protect, manage and restore areas with high biodiversity, ecological and aesthetic values, including buffer areas and habitat corridors.*

The proposal is consistent with zone objectives to promote a range of recreational uses that are not incompatible with a major racing and entertainment venue and are permissible within the open space and parklands context. The Racecourse has a history of a variety of non-racing events including large festival events such as Future Music Festival (2006-2013).

The proposed use of the site will have no impact on the heritage significance of the conservation area or local item of significance, and is notably consistent with the historic use of the site for events since the establishment of the site as a recreational facility in 1842. Further analysis of this comprehensive site history, the statement of significance under the Draft Randwick Racecourse Conservation Management Plan and the heritage listing under the Randwick LEP 2012 will be provided within the EIS.

4.2. STRATEGIC PLANNING CONTEXT

The relevant strategic planning policies that apply to the project are as follows:

- Greater Sydney Region Plan (A Metropolis of Three Cities)
- Eastern City District Plan
- NSW Future Transport 2056
- Development Near Rail Corridors and Busy Roads – Interim Guidelines
- Visitor Economy Action Plan 2012
- Sydney's Rail Future 2012
- Sydney's Cycling Future 2013
- Sydney's Walking Future

An assessment of these strategic planning policies in relation to the project will be provided within the EIS.

5. KEY ISSUES FOR CONSIDERATION

The key planning considerations relevant to the parameters of the non-race day events have been identified below, including a brief discussion of their relevance to the SSD DA.

Compliance with Strategic and Statutory Plans

The proposed non-race day events will see the continued use of the site as a *recreation facility (major)* and is consistent with the character of the broader recreation and entertainment precinct.

The EIS will include a comprehensive assessment of the proposed development against the relevant strategic and statutory provisions previously identified.

Event Scheduling and Cumulative Impacts

The ATC is seeking consent for up to 17 non-race day events per annum (without the need to seek further consents). In order to provide the ATC with sufficient flexibility to accommodate various non race events, the proposal does not seek to identify the specific dates or weekends that these events will be held. While this represents a different approach to the previous SSD 6134 Mod 1 music festival consent, this flexible approach has been successfully adopted for previous SSDs such as SSD 8169 - North Byron Parklands Cultural Events Site, approved on 13 March 2019. This approval granted consent for 20 events per year with a capacity up to 50,000 patrons on a seasonal (summer/ winter) basis for large events, and no specified dates for small and medium events. We seek to adopt a similar approach on the racecourse site for the ATC.

As part of the SSD process consultation with key stakeholders such as the Moore Park Events Operation Group (**MPEOG**), Centennial Park and Moore Park Trust (**CPMPT**) and Sydney Cricket Ground Trust (**SCGT**) will be undertaken to ensure potential event conflicts can be managed and mitigated. A formalised Stakeholder Engagement Plan will be prepared and submitted with a future SSDA.

The site provides a number of event spaces that can be utilised independently for smaller events or simultaneously for large events. The EIS will further address the management of multiple events on the site (and the limitations in which only one event can be accommodated) and the cumulative impacts arising from this. This can be managed in accordance with a condition of development consent or an approved Operational Management Plan. In accordance with DPIE instruction, the assessment of the environmental impacts of the proposal will be based upon the 'worst case scenario', to provide sufficient certainty of the adequacy of the assessment.

As stated previously, the primary use of the site will remain as a horse racing/training facility. In the event there is a conflict between a race and non-race day event, the non-race day event will not be held, specifically during the race day carnivals.

Cumulative impacts and mitigation measures will be considered as part of the SSDA.

Operation of Events

The site is a private recreation space that provides a variety of event spaces including permanent venues and large flexible external areas. The capacity of the racecourse varies according to the type of event being held. However, it is noted the site can accommodate up to 55,000 patrons which typically occurs during major race day events. The existing Functions and Events Management Plan (prepared in February 2013) will be updated to provide additional measures to address the proposed non-race day events framework. The event management plan will address:

- Noise and odour control.
- Traffic and crowd control.
- Cleaning and waste management.
- RSA and sale of liquor on the site.
- Community engagement and complaints.
- Staff management plan.
- Hours of operation.

In addition to the above, the following supporting management documents will be updated and refined with management strategy where required:

- ATC Security Alert & Escalation Plan
- Alcohol Management Operations Register
- Security & Risk Information

Public Safety and Crowd Management

The historic use of the site for race day and non-race day events has led to the refinement of the crowd management procedures at Randwick Racecourse. This extensive experience will ensure non race day events will run smoothly with minimal impact on the surrounding residents. The ATC enjoys a long-standing and effective relationship with stakeholders in the surrounding area including NSW Police Force, Randwick Collaboration Group and local residents to ensure a positive dialogue is maintained for the resolution of complaints and community dissatisfaction.

Heritage

The site contains a local heritage item ('Members' Stand') and is identified as an HCA ('Racecourse'). There are also several heritage items proximate to the site. These sites have been and will continue to be carefully considered throughout the process. A Heritage Impact Statement will accompany the EIS and application, however the following is noted:

- The use of heritage building on the site for non-race day events would be in a similar manner to their use and operational arrangements on existing race days.
- No physical works are proposed to be carried out that will alter the fabric of the Racecourse heritage listed conservation area, or the heritage listed Members Stand. These heritage items will be protected through measures proposed in the Heritage Impact Statement, that will guide event organisers and ensure the site is utilised in a way that respects the heritage fabric.
- The use of the site for non-race day events is consistent with the Draft Conservation Management Plan (CMP) prepared in 2005, which indicates non-race day events have been accommodated on the site since the 1970s.

Traffic and Transport Impacts

The site is located within a highly accessible urban area, with proximity to a regional road network, bus routes, light rail, a taxi rank and bicycle routes. The arrival of the light rail has benefited the site and provided additional travel modes to the benefit of visitors and employees. These transport services are designed to support a large influx of patrons to the site and will continue to do so for future non-race day events on the site. It is therefore anticipated that the modal shift of patrons accessing the venue will comprise a high proportion of public transport use, and a lower proportion of private car usage. Use of public transport will be promoted in relation to all events, particularly large events.

Whilst the proposed event scope will generate additional traffic activity, it is not expected that the small – medium events will have a significant impact on the operation of the local road network that would require temporary traffic controls. In relation to the larger (35,000 pax and 50,000 pax) events, temporary traffic controls may be required to ensure the local road network continues to operate at a satisfactory level of service. Where necessary, this will be detailed in the future Traffic and Transport Impact Assessment. It is similarly noted that these larger events have been accommodated on the site in the past and supported by Council, RMS and NSW Police without major traffic disruption.

The site accommodates on site car and bus parking. Further details will be provided in the SSDA.

The overall provision of parking can be utilised for patrons attending a non-race day event; however, it is noted ATC and the event managers will strongly encourage use of public transport.

Acoustic Impact

The accommodation of non-race day events will generate noise emission associated with operational noise from events on the site, including outdoor amplified music, general noise from patron use, increased or altered traffic noise associated with people accessing the site from surrounding public roads, and increased pedestrian noise generated from new venues and increased total occupant capacity.

To undertake a qualitative assessment of the acoustic impact, noise surveys will be undertaken on the site, and anticipated noise from events assessed against the acoustic criteria such as:

- Operational noise emission – The Industrial Noise Policy (EPA 2000)
- Sleep Disturbance – The Industrial Noise Policy’s – Application Notes and the Road Noise Policy
- Traffic Generation – The Road Noise Policy (DECCW 2011)
- Offensive Noise – Noise Guide for Local Government (EPA 2013)

Mitigation measures will be proposed to reduce the level of impact on surrounding residents. These measures will be consistent with the noise abatement measures incorporated in previous applications (refer **Section 2.4**), such as setting a noise limit for non-race day events and bump in/ bump out phases. These measures will be supplemented by management procedures which will encourage patrons to leave the venue quietly to reduce the amelioration of noise within the surrounding area.

Environmental noise and vibration from sources in the surrounding area are not expected to adversely impact the operation of non-race day events at the site or the enjoyment of patrons. While the Royal Randwick Racecourse is proximate to the ANEF 20 contour, noise impacts from commercial aircraft traffic from Sydney Airport are not expected to impact the operation of events at the site.

Residential Amenity

Residential amenity will be a key issue for consideration, taking into account the findings and recommendations for impacts from traffic, noise, any potential light spill, and any findings from community consultation.

Social and Economic Impacts

The continuation of non-race day events on the site is consistent with strategic planning policies as it will continue to deliver a unique tourism experience that will generate positive social benefits, multi purpose use of an existing recreational facility and additional employment opportunities for the local community. Potential anti-social impacts such as noise, anti-social behaviour and safety, will be addressed in a Social Impact Assessment submitted with the SSDA.

The project is essential for ATC, as a result of the unforeseen issues that have impacted the Racecourse in 2020. Visitation and revenue has suffered as a result of COVID-19. This project will deliver genuine economic benefits in these challenging times and expand the range of non-race day events permitted on the site.

6. REQUESTED WAIVERS

6.1.1. Biodiversity Development Assessment Report

It is common that the SEARs will require an assessment of the proposal's biodiversity impacts in accordance with the *Biodiversity Conservation Act 2016*, including the preparation of a Biodiversity Development Assessment Report (**BDAR**) where required.

It is formally requested that a waiver for the preparation of the BDAR is granted by the DPIE and Ecology, Environmental and Science (**EES**). This requested is submitted in accordance with clause 7.9 of the *Biodiversity Conservation Act 2016* as follows:

Clause 7.9 - Biodiversity assessment for State significant development or infrastructure

(2) Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.

This use of the site for non race day events will have no impact on animal / plant species or the diversity of ecosystems, and as such will not likely have any significant impact on biodiversity values. It is further noted the site does not contain any environmentally sensitive land and is not identified within the Randwick LEP 2012 as containing terrestrial biodiversity. Accordingly, a request to waive the requirement for the preparation of a BDAR is submitted within this Scoping Report.

6.1.2. Aboriginal Cultural Heritage Assessment Report

It is common that the SEARs will require an assessment of the proposal's impact upon Aboriginal heritage in accordance with the *National Parks and Wildlife Act 1974*, including the preparation of an Aboriginal Cultural Heritage Assessment Report (**ACHAR**) and consultation with the Aboriginal community.

It is formally requested that a waiver for the preparation of the ACHAR is granted by the DPIE. There are no underground works proposed that may impact Aboriginal archaeological heritage. Accordingly, a request to waive the requirement for the preparation of a ACHAR is submitted within this Scoping Report.

7. ENGAGEMENT

The EIS will outline the detailed engagement strategy for all stages of the planning process. It is anticipated that the following stakeholders will be engaged at various stages throughout the process:

- Randwick City Council
- Local and state politicians
- Community members/groups
- NSW EPA
- Transport for NSW (**TfNSW**)
- State Transit Authority
- NSW Police Force
- Moore Park Events Operation Group (or relevant Group)
- Centennial Park and Moore Park Trust
- Sydney Cricket Ground Trust
- Randwick Collaboration Group

8. EXPECTED DELIVERABLES

To assist in informing the SEARs, the following are the expected deliverables (reports & documentation) to support the EIS for the SSDA:

- EIS and Mitigation Measures;
- Traffic and Parking Report;
- Pedestrian, Traffic and Transport Management Plan;
- Acoustic Impact Statement;
- Noise Management Plan;
- Security Management Plan;
- Emergency Procedures Plan;
- Risk Management Plan;
- Waste Management Plan;
- Updated Functions and Event Management Plan;
- Stakeholder and Community Engagement Plan;
- Heritage Impact Statement; and
- Site Layout Plan illustrating the site, zones for events, event layout, security zones.
- Owners Consent and required lodgement documentation.

9. CONCLUSION

This report has been prepared to request SEARs from the Secretary of the NSW Department of Planning, Industry and Environment to guide the parameters for non-race day events at Royal Randwick Racecourse. This report includes preliminary consideration of the key issues to assist the DPIE in the preparation of the SEARs. This report is considered sufficient to enable the Secretary to issue the SEARs in order to prepare an EIS for the project.

In summary, the key issues identified in relation to the proposal are considered to be:

- **Event scheduling and conflict** – The site is located within an identified event precinct, and as such managing potential event clashes with alternative venues in the surrounding area will be critical to avoid cumulative impacts on residents.
- **Traffic, parking and transport impacts** – As the site is already established as a major recreation facility, with existing access points to classified roads and road and light-rail public transport, it is not anticipated that the proposal will significantly change the traffic and transport demands on the surrounding network. However, as the use of the site for non-race day events will likely generate attendance from patrons who may be unfamiliar with this area, the proposal will need to minimise impacts in relation to transport congestion, encourage use of public transport, road and rail safety, and enhance accessibility where possible.
- **Acoustic impact** – The introduction of potential acoustic impacts associated with non-race day events and use of amplified noise sources will need to be considered and mitigated to minimise impact on surrounding residents. This will similarly apply to noise generated by patrons (both in attendance and when entering/ exiting the venue), and associated infrastructure/ operations.
- **Engagement** – Consultation with key stakeholders will be an integral part of the environmental assessment process and the outcomes of consultation undertaken during the preparation of the SSDA will be considered in the refining of the event framework and detailed in the EIS.

We look forward to the receipt of SEARS to guide the preparation of the SSDA application for this project.

DISCLAIMER

This report is dated 8 December 2020 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Australian Turf Club (**Instructing Party**) for the purpose of Scoping Report (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

