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# **SSDA SCOPING REPORT**

Royal Randwick Racecourse  
Hotel

Prepared for  
**AUSTRALIAN TURF CLUB**  
MARCH 2022

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# 1. INTRODUCTION

## 1.1. OVERVIEW

This Scoping Report has been prepared by Urbis on behalf of the Australian Turf Club (**ATC – the Proponent**) regarding a proposal for the construction and operation of a hotel at Royal Randwick Racecourse (**Royal Randwick**). The application seeks consent to replace a previously approved hotel within this location (SSD-5002-2011, which has been physically commenced so that the consent remains operational, but the approved hotel has not yet been constructed) with an updated design and service offer now proposed to better align with the current market demand in the tourism sector.

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 Royal Randwick, which is located at 43 Alison Road, Randwick and is legally described as Lot 2009 in Deposited Plan 1169042 (**the site**). Royal Randwick is identified in its regional context in **Figure 1**.

This report has been prepared in accordance with the *'State Significant Development Guide: Preparing a Scoping Report'* exhibited in July 2021 by the Department of Planning and Environment (**DPE**).

This section of the report identifies the applicant for the project and describes the site and proposed development. It outlines the site history and feasible alternatives explored in the development of the proposed concept, including key strategies to avoid or minimise potential impacts. The report is supported by the following documentation:

- Indicative Architectural Plans prepared by WMK (**Appendix A**)
- Scoping Summary table (**Appendix B**)

Figure 1 Site Context



Source: Urbis

## 1.2. APPLICANT DETAILS

The applicant details for the proposed development are outlined in the following table.

Table 1 Applicant details

Descriptor	Applicant Details
Full Name	Australian Turf Club Limited
Postal Address	Royal Randwick Racecourse, Alison Rd, Randwick NSW 2031
ABN	81 148 157 288
Nominated Contact	Matt Galanos, ATC CFO / Secretary
Contact Details	<a href="mailto:mgalanos@australianturfclub.com.au">mgalanos@australianturfclub.com.au</a>

## 1.3. PROJECT SUMMARY

The application seeks consent for the construction and operation of a hotel within the Spectator Precinct of Royal Randwick. Consent is sought to replace a previously approved hotel within this location (SSD-5002-2011, which has been physically commenced so that the consent remains operational, but the approved hotel has not yet been constructed) with an updated design and service officer proposed to better align with the current market demand in the tourism industry. Indicative development plans illustrating the proposed scope of works prepared by WMK is provided at **Appendix A**.

Whilst opportunities to amend the previous approval (SSD-5002-2011) were explored via an Amending DA (which is a valid planning pathway), at the direction of the DPE a fresh SSDA is proposed to be submitted to ensure a complete assessment of the environmental impacts are considered and to reduce complexity in the determination process. To ensure there are not multiple active consents valid on the site, the previous hotel approval will be voluntarily surrendered under section 4.63 of the EP&A Act as a future condition of development consent. This will provide sufficient certainty to the ATC, DPE and the community of the future of the site redevelopment.

Royal Randwick has an extensive history within Australia's recreational culture for over 150 years. To ensure the ongoing primacy of this site and to effectively respond to the diversity of the racing industry, the ATC seeks to utilise surplus land on the site to service an emerging sub-sector of the tourism industry known as equine tourism. Equine tourism is an important and growing offer within the tourism industry and is one which is currently underserved within the Greater Sydney region. The provision of a hotel at Royal Randwick will:

- Provide a unique equine tourist and visitor accommodation offer that is not currently available in the Eastern City District,
- Deliver significant economic benefits to the local and regional economy,
- Complement the existing tourist/recreational/entertainment/event use of the site consistent with zone objectives,
- Support the core function of the site as a horse-racing facility though providing complementary short-term tourist and visitor accommodation within the Spectator Precinct, which will enhance the offerings and reputation of the Royal Randwick site as a world-class cultural, entertainment and recreational venue.

The built form of the proposed hotel is generally consistent and considered to be an improvement to the hotel scheme which was approved under the previous approval SSD-5002-2011.

Specifically, the SSDA will seek consent for:

- Removal of the existing Oaks Marquee (a temporary structure).
- Tree removal (quantum to be refined during detailed design).
- Construction of a 7-storey mixed-use development accommodating a hotel and registered club to a total building height of RL60.5 (27.5m) comprising:
  - 2 storeys of recreational facilities (indicative gym and day spa), club facilities (known as ‘The Jockey Club’, including private lounge and gaming areas), function centre space, hotel amenities (pool, lobby, back of house and an outdoor terrace), and an ancillary restaurant and bar.
  - 5 storeys of hotel facilities between level 2 – level 6 comprising 172 hotel keys and 18 serviced apartment suites, with outdoor terraces accommodated on the eastern, southern and western elevations (oriented towards the racetrack straight).
  - 1 basement level accommodating 24 parking spaces, storage, loading, services, end of trip facilities (EOTF) and back of house services.
- A proposed extension to the existing one-way internal vehicular network to provide access to an undercover porte-cochere and two parking spaces proposed at ground level, adjacent to the primary building entrance. The extension to the vehicular network will provide for one-way access through the site, with both entry and exit provided onto Alison Road.
- Site landscaping.

The project is likely to be delivered in a single stage.

Overall, the revised design is to be generally consistent with the height, building envelope, orientation and siting of the approved hotel on the site. It is also generally consistent with the existing active approval for demolition, tree removal and site preparatory works. The proposed basement has a smaller footprint than the approved basement as a reduced quantum of car parking provision is proposed.

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 has a capital investment value of more than \$10 million’.

The proposed early works have a CIV that exceeds the \$10 million threshold and the works are located within the Royal Randwick site. It is therefore submitted to the DPE for assessment and determination by the Minister of Planning or their delegate.

DPE released the Rapid Assessment Framework (**RAF**) for SSDAs in late 2021. This included the introduction of Industry-specific SEARs which apply to SSDAs, other than those that:

- Would be designated development but for the Act, section 4.10(2), or
- Are partly prohibited by an environmental planning instrument (EPI), or
- Are wholly prohibited by an EPI, to the extent permitted by the Act, section 4.38(5), or
- Are a concept development application for State significant development.

Whilst the final mix of uses and how they operate is still evolving alongside the detailed design and further market testing, the primary use of the development is for *hotel and motel accommodation, serviced apartments and registered club* with associated gaming (with 30 additional gaming machine licences). The proposal also includes consideration of indicative ancillary land uses including a gym, day-spa, café/restaurant (potentially with a takeaway function), bar and function centre.

The Hotel could also be used on race days and for ancillary non-race day events, including functions, corporate events, and exhibitions. Use of the Hotel for minor non-race day events will be consistent with conditions approved under MP10\_0097\_MOD 2, which applies to the entirety of the Spectator Precinct at Royal Randwick Racecourse and encompasses the location of the proposed new facility. Specifically, this existing approval provides conditions for the operation of non-race day events (including maximum patronage capacity). This proposal intends to operate in accordance with those conditions, including Condition A5 of MP10\_0097\_MOD 2 related to non-race day events and functions.



Whilst a *bar*, *day spa* and *takeaway food and drink premises* are not permitted uses on the site, they are considered to be ancillary land uses to the primary use. DPE may, however form the view the application is considered to be 'partly prohibited' and required to be assessed under section 4.38 of the EP&A Act. Therefore, for abundant caution we have prepared this Scoping Report in case the application is not eligible for Industry-specific SEARs. It is, however, anticipated that the DPE will issue project-specific SEARs for the SSDA.

## 1.4. RELEVANT PLANNING HISTORY

### 1.4.1. SSD-5002-2011 MOD-1

On 14 November 2014, SSDA approval (**SSD-5002-2011**) was granted by the Planning Assessment Commission (**PAC**) for a hotel development at Royal Randwick. The approval granted consent for the construction and operation of an 8-storey hotel building within the Spectator Precinct of Royal Randwick, with a primary frontage to Alison Road as illustrated in **Figure 2**.

Figure 2 Photomontage of approved development



Source: TKGA

Specifically, approval was granted for:

- Demolition of existing amenities block and two steward towers and partial demolition of the existing boundary fence.
- Construction of an 8-storey hotel building including:
  - 170 serviced apartments;
  - A restaurant and bar with external terrace;
  - Conference and meeting room facilities;
  - An outdoor swimming pool and terrace;
- Basement parking for 50 vehicles
- Trackside bar.
- Associated infrastructure works, landscaping, conservation works and signage.

The application was physically commenced however the approved hotel was never constructed.



### 1.4.2. SSD-5002-2011-MOD-1

On 29 August 2019, a modification (**SSD-5002-2011-MOD-1**) was granted by DPE under delegation from the Minister for a modification to Condition A7 of the SSD-5002 Notice of Determination. The approval modified the wording of Condition A7 to delete the word “building” such that the lapsing of the consent relates to works in general, to align with the standard wording of other SSD consents.

Condition A7 was thus modified as follows:

#### **A7. Limits of this consent**

*This consent will lapse five years from the date of this consent unless the works associated with the application have physically commenced.*

The application was physically commenced; however, construction of the hotel has not yet commenced.

### 1.4.3. 2020 Market Assessment and Scheme Review

In 2020, the ATC engaged a specialist hotel operator to conduct an independent market assessment and review of the overall feasibility and marketability of the approved hotel development. This included a review of the scheme in both pre-COVID and post-COVID environments. The review identified that the currently approved scheme is “*over-capitalised and not market facing. It is unlikely to be feasible or externally financeable, (in either the pre or post COVID-19 environments).*”

Whilst the approved location and overall service offer of a hotel was deemed appropriate, changes were identified as required to the approved scheme in order to attract a diversified and risk-mitigated market mix. These changes primarily related to the overall quantum of approved GFA and the allocated use of the GFA within the development. The above review also complements correspondence with hotel operators conducted by the ATC which indicated a preference for smaller room sizes within this location and market. In light of contextual changes affecting the precinct’s transport needs, including the completion of the CBD Light Rail and completion of the multi-deck car park onsite, the provision of car parking in the hotel is also questioned.

The re-design of the scheme and removal of unfeasible elements has resulted in an excess of floor space within the approved building envelope. To provide more profitable uses in response to market demand and to ensure the viability of the development, the ATC seeks to make a number of changes to the approved scheme. Available planning pathways to amend the scheme were discussed in the Scoping Meeting with the DPE, as outlined in **Section 5**.

## 2. STRATEGIC CONTEXT

### 2.1. STRATEGIC JUSTIFICATION

Sydney is Australia's premier destination city and the gateway to NSW, with 11.1 million domestic tourists and 4.1 million international tourists visiting Sydney in 2018. Of these tourists, 5.7 million stayed within the Randwick LGA, representing a gross value add of \$235 million.

Royal Randwick is a significant contributor to this economic development of the LGA, with the Randwick Local Strategic Planning Statement (**LSPS**) noting that *"The Royal Randwick Racecourse is an important cultural and tourist destination within Randwick attracting over 1.2 million visitors (including non-race day events) per year."*

The development of complementary tourist and visitor accommodation at Royal Randwick will not only boost the current operation of the site, but also provide accommodation for tourists visiting the surrounding entertainment and tourist 'draw-cards' of the LGA. The following is also noted:

- There is a need to provide high quality hotel accommodation to address the current shortfall of hotels in the Sydney metropolitan area.
- There is a need to provide complementary land uses in appropriate locations to support the role and growth of the Randwick Specialised Health and Education Centre.
- There is a need to utilise Royal Randwick surplus land efficiently for the benefit of the ATC, the thoroughbred racing industry, and to support Prince of Wales Hospital, the University of NSW, and Randwick City Council (**Council**), SCG/SFS and Entertainment Quarter.
- There is a need to develop and capitalise upon Greater Sydney's tourism offer in order to ensure the industry remains competitive and relevant when domestic and international travel returns bounces back to normal.

The proposal seeks to deliver approximately 172 hotel rooms and 18 serviced apartments, including supporting services such as conference/function rooms, registered club, hotel amenities and food and beverage facilities. The provision of this short-term accommodation will support the supremacy of the site as a key recreational precinct within the Eastern City District. The delivery of a high-amenity hotel in a highly accessible location is intended to attract international and domestic visitors, and create diversity within the precinct, providing activation outside of typical core horseracing periods.

It is also noted the proposal will result in positive spill-over effects from related tourist expenditure for the surrounding centres. Strategic justification for the project is further discussed within the following strategic plans and policies, which will be assessed within the EIS:

- Greater Sydney Region Plan (A Metropolis of Three Cities)
- Eastern City District Plan
- Randwick LSPS
- 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

## 2.2. KEY FEATURES OF SITE AND SURROUNDS

### 2.2.1. Regional Context

Royal Randwick is one of the largest recreation areas in the highly urbanised Eastern Suburbs of Sydney. It is located within a major open space, event and entertainment precinct that includes a range of passive and active recreation areas and sporting/entertainment 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 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 and Central Station.

Royal Randwick is also directly adjacent to the CBD and Southeast Light Rail (**Light Rail**). 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. This provides a high frequency service connecting key locations within the Sydney CBD, and links major recreation, education, commercial and residential areas between the Eastern Suburbs and Sydney CBD.

Royal Randwick 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, and 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.

### 2.2.2. Royal Randwick

Royal Randwick is located at 43 Alison Road, Randwick. The legal description of the site is:

- Lot 2009 in Deposited Plan 1169042
- Lot 1588 in Deposited Plan 752011
- Lot 1642 in Deposited Plan 752011

The site comprises approximately 80.86 hectares of land. This SSDA relates exclusively to land on Lot 2009 in Deposited Plan 1169042.

The site is classified as Crown Land and is managed the Randwick Racecourse Trust under the *Australian Jockey and Sydney Turf Clubs Merger Act 2010*. The key function of is to “manage, use and maintain the land that comprises the Racecourse for the purpose of a public racecourse and associated activities”. The site is leased to the Australian Jockey Club (now known as the ATC) who operate the racecourse.

This SSDA relates to works within the Spectator Precinct of the Royal Randwick. This precinct is defined in the former Part 3A Project Approval MP08\_0092 (and MOD1), the Major Project Approval MP10\_0097 (and MOD 1 and 2), and the site-specific provisions contained in the Randwick Development Control Plan 2014 (**Randwick DCP**). 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 (**QE II**) Stand, the Officials Stand and the Winx Stand. 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.

Figure 3 Aerial image of Royal Randwick (site identified in 'red')



Source: Near Maps, Urbis

### 2.2.3. Land to which this SSDA relates

The location of the proposed building footprint is within the north-eastern portion of the Spectator Precinct, adjacent to the main straight and situated between the Members Stand and the Alison Road site boundary. The site is triangular in shape and slopes downward to the racetrack as illustrated in **Figure 4**.

The area currently accommodates the Oaks Lawn Marquee, hardstand area, existing plant and services, three 30m – 30.5m high lighting columns, a Stewards tower (for lighting and media purposes) and grassed area. The Oaks Lawn Marquee is a temporary structure. This is illustrated in the site plan extract at Figure 8.

The portion of land is relatively flat, and slopes slightly from the north-east at RL31.95 to the west at RL31.14. Images of this area are provided in **Figure 6**.



Figure 4 Aerial image illustrating indicative location of proposed works



Source: Google Maps, Urbis

Images of the existing land of the development footprint are provided in **Figure 6**.

Figure 5 Aerial image illustrating indicative location of proposed works



Source: Near Maps, Urbis



Figure 6 Images of the existing site improvements



Picture 1 Existing Oaks Marquee



Picture 2 Interface between existing Oaks Marquee and QE II Stand



Picture 3 Plant and services associated with the Oaks Marquee



Picture 4 Hardstand area to the north of the Oaks Marquee



Picture 5 Stewards tower and main racecourse straight

Source: Urbis



Picture 6 Grassed area and interface with QE II Stand

Source: Urbis

## 2.2.4. Future Site Development

A range of development projects are currently underway at Royal Randwick. Identification of these projects and their status are identified in **Table 2**. A complete assessment of the anticipated cumulative impacts of these current projects with the proposed development will be provided in the EIS.

Table 2 Identification of current development at Royal Randwick

Project	Description	Status
<b>Winx Stand</b>	<p>SSDA 10285 was determined on 13 July 2020 for the construction of a two-storey multi-purpose facility known as the 'Winx Stand'. The facility has a maximum height of 19.8m and an approximate total GFA of 5,043sqm, and accommodates up to 7,500 patrons in 'race day mode'.</p> <p>SSDA 19285 has since been modified for the internal fit-out and modification of Condition A2, A6 , F10, E32 and E33 (SSD-10285-Mod-1, determined on 10 December 2020) and for minor design amendments to the Winx Stand and the link bridge (SSD-10285-Mod-2, determined on 22 July 2021).</p> <p>The Winx Stand is located within the Spectator Precinct, to the south of the existing QE II members stand and as such does not have a direct interface with the proposed building footprint.</p>	<p>The Winx Stand opened in December 2021.</p> <p>Accordingly, there will be no overlap during the construction of the Winx Stand and the construction of the proposed hotel. During operation, the two facilities will operate simultaneously without any material significant overlapping impacts, due to the scale of the site and the separation of services, loading and vehicular access.</p>
<b>Night Racing</b>	<p>SSDA 8706 was lodged in May 2020 and seeks consent for up to 16-night racing events per annum at Royal Randwick (between October and April, coinciding with NSW Daylight Savings), structured as follows:</p> <ul style="list-style-type: none"> <li>Up to 12 Minor events (Up to 10,000 patrons).</li> <li>Up to 4 Medium events (10,001 to 15,000 patrons)</li> </ul> <p>The proposal includes the installation of new trackside lighting (new light poles) and the upgrade to the existing Spectator Precinct lighting (new lamps will be mounted on existing poles to improve safety). The proposed night racing will not result in a net increase in the number of racing events per year at RRR. Night racing events will inevitably result in fewer larger scale daytime racing events.</p> <p>The Response to Submissions for SSDA 8706 was lodged in February 2022.</p>	<p>The construction of trackside and updates to Spectator Precinct lighting sought within the application will improve the safety and visibility of the broader Spectator Precinct for future patrons of the hotel. Further, the hotel will complement the operation of night racing on the site to provide a unified and unique offer for guests.</p> <p>The EIS will address any cumulative impacts associated with the proposed lighting infrastructure under the Night Racing SSDA and the location of the proposed Hotel building footprint.</p>

Project	Description	Status
<b>Day Stalls</b>	<p>A local DA (DA/345/2021) was determined in December 2020 for the demolition of existing stripping stalls and the construction of new stripping stall facilities named 'Equine Barn' at the eastern portion of the site, to maintain essential core racing the training facilities at Royal Randwick. Specifically, the proposed works comprise of the following:</p> <ul style="list-style-type: none"> <li>▪ Demolition of existing stripping stalls and sand roll and roof</li> <li>▪ Construction of a new stripping stall facility generally comprising of: <ul style="list-style-type: none"> <li>- Horse stables</li> <li>- Internal horse stalls</li> <li>- Horse wash bays</li> <li>- Internal staff amenities and office space</li> <li>- Storage areas for horse feed and tracking equipment.</li> </ul> </li> <li>▪ Landscaping and site preparation works.</li> </ul>	<p>The Day Stalls are proposed to be located within the south-eastern portion of the site, on the opposite side of the racetrack to the proposed hotel development site. Separate access is available from Alison Road. The Equine Barn is currently under construction and as such there will be no concurrent construction works for the Day Stalls and the hotel.</p>
<b>Skydiving at Royal Randwick</b>	<p>A local DA (DA/169/2021) was determined in September 2021 for the commercial operation of tandem skydiving landing within the racetrack infield of the Royal Randwick, with hours of operation from 8am-5pm Sunday and some public holidays. No construction is proposed as part of the application.</p>	<p>The landing area for the skydivers is in the Infield precinct, and as such there will be no overlap with the construction and operation of the hotel within the Spectator precinct.</p>

## 3. PROJECT DESCRIPTION

### 3.1. OVERVIEW OF PROPOSED DEVELOPMENT

The proposed SSDA will seek approval for the construction and operation of a new mixed-use development comprising 'hotel and motel accommodation', 'serviced apartments' and 'registered club' with associated gaming (30 additional machines), ancillary parking, servicing and loading. The proposal also includes consideration of the following indicative ancillary land uses:

- Gym (third-part operator). The gym is likely to be used by Hotel guests, ATC members and potentially members of the public.
- Day spa (third-part operator). The day spa maybe available to Hotel guests, ATC members and potentially members of the public.
- Café/restaurant, bar and potentially take-away (third-part operator).
- Flexible corporate hospitality/ function space.

The delivery of tourist and visitor floor space on the site will contribute to the realisation of the applicant's vision for the site as a true entertainment and recreational destination within the Eastern City District. The proposal will not only capitalise upon and support the existing function of the site as a recreational racecourse/entertainment/cultural precinct but will also introduce new complementary land uses to optimise the site's large landholding whilst maintaining the site's efficient site operation and residential amenity of neighbouring properties. The delivery of the hotel within the Spectator Precinct of Royal Randwick will provide a highly visible contribution to the Alison Road frontage and will promote use of the adjacent Light Rail in accordance with Transport for NSW (**TfNSW**) objectives.

Specifically, the proposal will seek consent for:

- Removal of the existing Oaks Marquee (a temporary structure).
- Tree removal (quantum to be refined during detailed design).
- Construction of a 7-storey mixed-use development accommodating a hotel and registered club to a total building height of RL60.5 (27.5m) comprising:
  - 2 storeys of recreational facilities (indicative gym and day spa), club facilities (known as 'The Jockey Club', including private lounge and gaming areas), function centre space, hotel amenities (pool, lobby, back of house and an outdoor terrace), and an ancillary restaurant and bar.
  - 5 storeys of hotel facilities between level 2 – level 6 comprising 172 hotel keys and 18 serviced apartment suites, with outdoor terraces accommodated on the eastern, southern and western elevations (oriented towards the racetrack straight).
  - 1 basement level accommodating 24 parking spaces, storage, loading, services, end of trip facilities (**EOTF**) and back of house services.
- A proposed extension to the existing one-way internal vehicular network to provide access to an undercover porte-cochere and two parking spaces proposed at ground level, adjacent to the primary building entrance. The extension to the vehicular network will provide for one-way access through the site, with both entry and exit provided onto Alison Road.
- Site landscaping.

The project is likely to be delivered in a single stage.

The cost of works for the construction and operation of the hotel will be greater than \$10 million. This will be refined for submission of the SSDA. Key parameters of the scheme are outlined in **Table 3** and an extract of the proposed Ground Floor plan illustrating the proposed building footprint prepared by WMK is provided at **Figure 7**.

Refer to further detailed within the preliminary Architectural Plan set prepared by WMK at **Appendix A**.

## 3.2. KEY PARAMETERS

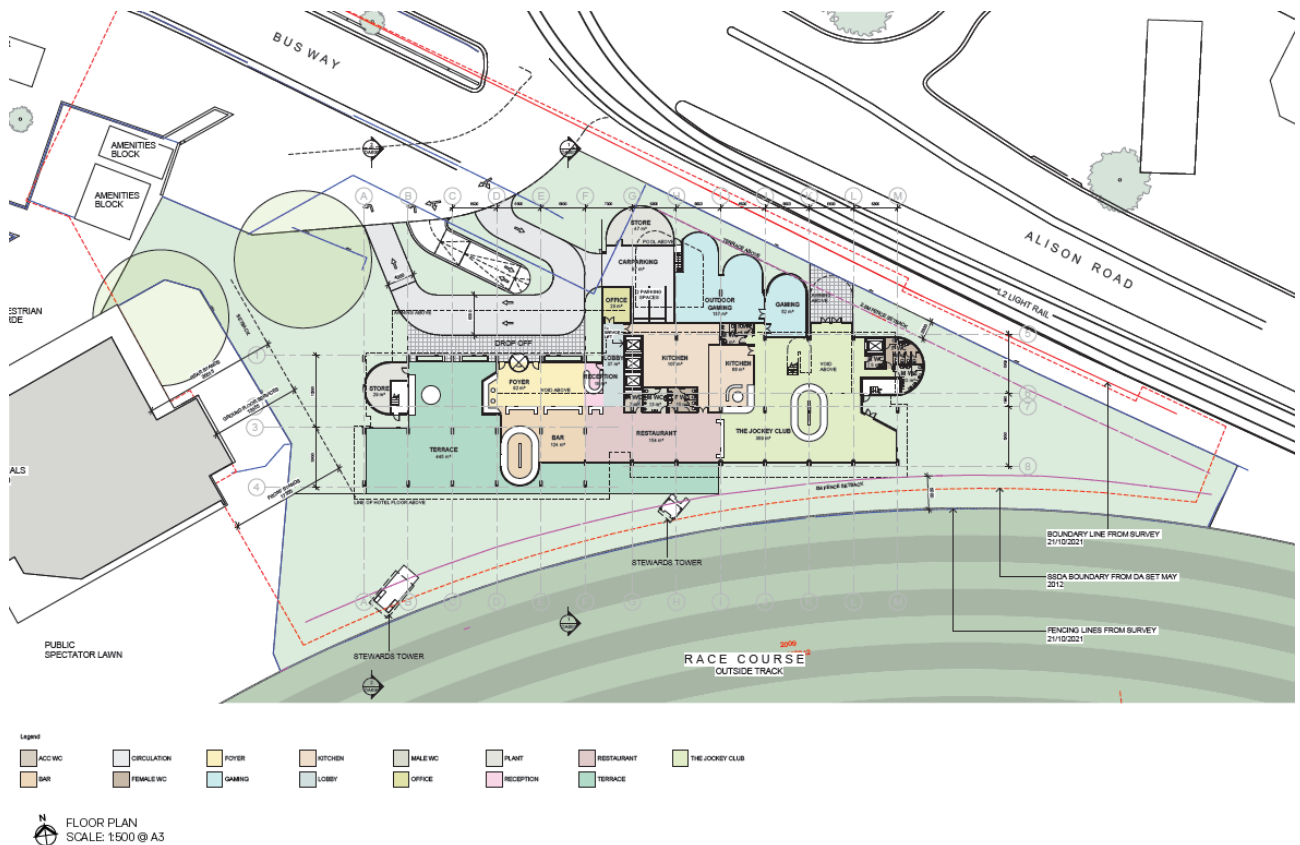
Key numerical details of the proposal are provided in **Table 3**.

Table 3 Key parameters

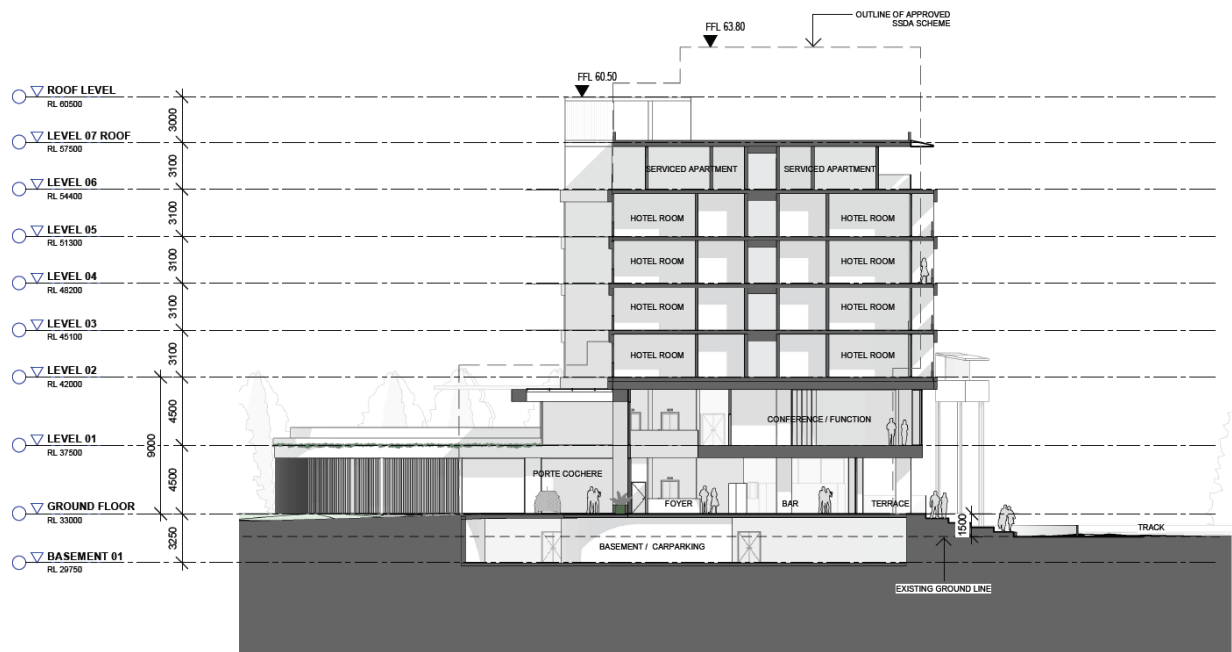
Parameter	Proposal
Site area	80.86ha
Building height/ storeys	RL60.5 (27.5m) / 7-storeys
GFA	Approximately 7,243sqm (to be refined and confirmed prior to SSDA submission)  A breakdown of the proposed GFA by land use will be provided in the EIS.
Primary uses	Hotel accommodation, serviced apartments and registered club
Ancillary uses	Conference/ function space, hotel gym and day-spa, food and drink premises (specifically 'restaurant or café', 'takeaway food and drink premises' and a 'small bar').
Hotel keys	172 hotel keys and 18 serviced apartment suites across five floors
Average room size	Hotel rooms: 25sqm  Serviced apartment suites: 40sqm
Vehicular access	Vehicular access will be provided from a proposed extension to the existing one-way internal vehicular network. The extension to the vehicular network will provide for one-way access through the site, with both entry and exit provided onto Alison Road. This will be refined prior to SSDA submission.
Car parking, loading and servicing	Car parking for approximately 26 vehicles accommodated on ground level (2 spaces) and basement level (24 spaces), in addition to servicing and loading provided in the basement.  A porte-cochere will accommodate visitor/ employee drop off and pick up adjacent to the primary building entry on the northern elevation.
Servicing and utilities	Augmentation of physical infrastructure and utilities as required.
Trees and landscaping	Removal of some trees, and site landscaping to be detailed in the SSDA documentation.
Signage	To be confirmed in the SSDA documentation



Figure 7 Preliminary Architectural Plan extracts



Picture 7 Ground Floor Plan



Picture 8 Section Plan

Source: WMK

### 3.3. FEASIBLE ALTERNATIVES

Clause 7 in Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (**the Regulation**) requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

In developing the proposed approach, a number of alternatives have been considered by the proponent to ensure the proposal maximises the economic, social and environmental benefits for the public. In summary, four key options were considered to address the project objectives and site constraints and opportunities:

- Scenario 1 – ‘do nothing’
- Scenario 2 – develop existing hotel approval (SSD-5002-2011)
- Scenario 3 – develop under alternative siting arrangements
- Scenario 4 – develop alternative architectural design scheme
- Scenario 5 - optimise development potential and public benefits through a 7-storey mixed use hotel and club development (**the proposal**)

Analysis of these alternatives will be provided in the EIS documentation.

## 4. STATUTORY CONTEXT

Identification of the relevant statutory planning policies applying to the site and proposal is outlined in the following **Table 4**.

Table 4 Statutory Requirements of the project

Matter	Guidance
Power to grant consent	<p><b>EP&amp;A Act</b></p> <p>This development is proposed under Part 4 of the <i>Environmental Planning and Assessment Act 1979</i>, Division 4.1 State significant development, Section 4.38 and is subject to the Minister's consent.</p> <p>The Minister of Planning and Public Spaces is the consent authority for SSDA. The Minister may delegate this function to staff within the DPE. Notwithstanding, the Independent Planning Commission (<b>IPC</b>) will be the consent authority in the following circumstances:</p> <ul style="list-style-type: none"> <li>▪ The application is not supported by the relevant Council;</li> <li>▪ The Department has received more than 50 unique public objections, or</li> <li>▪ The application has been made by a person who has disclosed a reportable political donation in connection with the development application.</li> </ul> <p><b>State Significant Development SEPP</b></p> <p>Pursuant to Schedule 2 Clause 4 of the SRD SEPP, the proposed development is considered SSD as identified below:</p> <p><i>4 Development at Royal Randwick Racecourse</i></p> <p><i>Development on land identified as being within the Royal Randwick Racecourse Site on the State Significant Development Sites Map if—</i></p> <p><i>(a) it has a capital investment value of more than \$10 million, or</i></p> <p><i>(b) it is for the purposes of an event that is not a race day event.</i></p> <p>As the capital investment value of the proposal will exceed \$10 million at Royal Randwick, the future development on the site will be submitted for approval as an SSD development application.</p>

Matter	Guidance
Permissibility	<p>The Randwick LEP 2012 is the principle environmental planning instrument applying to the site. The site is zoned RE1 – Public Recreation.</p> <p><i>Restaurants or cafes</i> and a <i>recreational facility (indoor)</i> (including gym and a day spa/ health studio) are permitted uses in the RE1 zone.</p> <p>Clause 7 of Schedule 1 of the Randwick LEP 2012 permits the development of a <i>registered club</i> by the Australian Turf Club on the following lots:</p> <ul style="list-style-type: none"> <li>▪ Lot 2009, DP 1169042;</li> <li>▪ Lot 1588 and 1642, DP 752011</li> </ul> <p>These lots correlate with the area of the site identified in <b>Section 2.2</b>, and as such registered clubs are permitted on the subject site.</p> <p>Clause 8 of Schedule 1 of the Randwick LEP 2012 permits <i>hotel or motel accommodation, serviced apartments</i> and <i>function centres</i> as additional permitted uses on the part of the site proposed for these uses.</p> <p>It is noted the proposed concept indicatively seeks to include <i>Takeaway food and drink premises</i> and <i>Small bar</i>. These uses are <u>not</u> identified as permissible uses in the RE1 zone.</p> <p>These uses will operate ancillary to the broader purpose and use of the site as a hotel. The SSD would thus seek consent for the use of the site as a hotel, permitting the ancillary uses within the consent. Evidence of the ancillary nature of these uses can be submitted within the EIS.</p> <p>Notwithstanding, it is noted that Section 4.38 (2) of the EP&amp;A Act identifies the power to grant consent to State significant development is only circumscribed if the development is “<i>wholly prohibited by an environmental planning instrument</i>”. This permits the Minister to grant consent to a State significant development proposal that may be partially prohibited by an EPI.</p>
Other approvals	<p><b><i>NSW Native Vegetation Act 1997</i></b></p> <p>Pursuant to section 4.41 of the EP&amp;A Act, SSD is exempt from the need for an authorisation under section 12 of the <i>Native Vegetation Act 2003</i> to clear native vegetation.</p> <p>Notwithstanding this, detail of any trees required for removal to facilitate the proposed works will be included in the EIS.</p> <p><b><i>NSW National Parks and Wildlife Act 1977</i></b></p> <p>Pursuant to Section 4.41 of the EP&amp;A Act, SSD is exempt from the need for a section 90 permit for the removal of items of Aboriginal heritage.</p> <p>Due to the site’s location in close proximity to known archaeological items, an Aboriginal Cultural Heritage and Archaeology Report (<b>ACHAR</b>) will form part of the EIS and supporting documents.</p>

Matter	Guidance
	<p><b><i>Liquor Act 2007</i></b></p> <p>Relevant licences can be granted and held under Part 3 of the <i>Liquor Act 2007</i> and will be sought post-determination of the SSD application, and prior to the issue of an Occupation Certificate.</p> <p><b><i>Gaming Machines Act 2001</i></b></p> <p>The ATC currently hold gaming license permits under Part 7 of the <i>Gaming Machines Act 2001</i> and have 20 gaming licenses available on site. The SSDA will involve the transfer of 30 additional gaming licenses to the site to operate within the registered club proponent of the application. Accordingly, the proposal will not result in a net increase in gaming machines within the Greater Sydney area. The gaming machines will be located within a separate area ('gaming room') in accordance with section 68 of the <i>Gaming Machines Act 2001</i>.</p> <p>Further detail of the proposed location, quantum and compliance of the gaming machines will be detailed in the EIS.</p> <p><b><i>Roads Act 1993</i></b></p> <p>Any works proposed to a public road as part of the proposed development would require the consent of TfNSW.</p> <p>Consultation would be undertaken with TfNSW during the preparation of the EIS to ensure adequate consideration of potential issues affecting public roads within or surrounding the site. Following issue of a development consent, a Section 138 approval will be sought for any road works or traffic signal amendments.</p> <p><b><i>Rural Fire Act 1977</i></b></p> <p>The site is <u>not</u> identified as bushfire prone land.</p> <p>It is further noted that pursuant to section 4.41 of the EP&amp;A Act, SSD is exempt from the need for a bushfire safety authority and from conforming with the <i>Planning for Bushfire Protection 2019</i> under Section 100B of the Rural Fires Act.</p> <p>There is no further approval required under the Rural Fires Act 1977.</p>
Pre-Conditions prior to granting consent	<p><b><i>Biodiversity Conservation Act 2016</i></b></p> <p>Clause 7.9 of the <i>Biodiversity Act 2016</i> applies to SSD applications and requires SSD applications to be accompanied by a BDAR report unless it is determined the proposal is not likely to have any significant impact on biodiversity values.</p> <p>The development is not likely to have any significant impacts on biodiversity values as the development involves works to a highly disturbed and modified site. Any tree removal required for the proposed development would not adversely impact any native animals and plants, including threatened species, populations and ecological communities, or their habitats. Further detail of any vegetation removal will be submitted within the application.</p>



Matter	Guidance
	<p>Accordingly, a BDAR Waiver to request the requirement to submit a BDAR is waived under clause 7.9(2) of the <i>Biodiversity Conservation Act 2016</i> will be submitted following issue of the SEARs.</p> <p><b>SEPP No. 55 – Remediation of Land</b></p> <p>SEPP 55 requires the consent authority to consider whether the subject land of any rezoning or development application is contaminated. If the land requires remediation to ensure that it is made suitable for a proposed use or zoning, the consent authority must be satisfied that the land can and will be remediated before the land is used for that purpose.</p> <p>Previous environmental investigations on the site have revealed the site has a generally low risk of soil and groundwater contamination. This is due to the historical use of the site as a racecourse since the 1800's to present, and a Workcover Dangerous Goods Search which indicated that no dangerous goods stores were registered for the precinct and any registered dangerous goods were down gradient of the site.</p> <p>Further detail of these studies and outcomes will be included in the EIS.</p>
Mandatory matters for consideration	<p>Section 4.15 of the EP&amp;A Act outlines the matters that a consent authority must take into consideration when determining development applications. These matters are summarised as:</p> <ul style="list-style-type: none"> <li>▪ Provisions of environmental planning instruments (including draft instruments),</li> <li>▪ Development control plans,</li> <li>▪ Planning agreements, and the Environmental Planning and Assessment Regulation 2000 (EP&amp;A Regulation)</li> <li>▪ The environmental, social and economic impacts of the development,</li> <li>▪ The suitability of the site,</li> <li>▪ Any submissions, and</li> <li>▪ The public interest, including the objects of the EP&amp;A Act and the encouragement of ecologically sustainable development (<b>ESD</b>).</li> </ul> <p>Notwithstanding the above, it is noted clause 11 of the SRD SEPP states that development control plans do not apply to State significant development.</p> <p>A preliminary identification of key environmental planning instruments applying to the site and proposed development are identified below.</p> <p><b>Infrastructure SEPP</b></p> <p>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</p>

Matter	Guidance
	<p>points, the timing, volume and frequency of vehicle access to the site may change. These requirements will be addressed and detailed in the EIS.</p> <p>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 TfNSW for comment. This includes certain tourist facilities, recreation facilities, showgrounds or sportsgrounds with capacity for more than 200 motor vehicles. Whilst the application does not seek to provide 200 or more car parking spaces and the proposal is unlikely to trigger the need for referral to TfNSW under the ISEPP, the SSDA may be referred to TfNSW due to the existing high level of traffic associated with the existing use of the RRR as a well-known recreation/tourist facility.</p> <p><b>SEPP 64 – Advertising and Signage</b></p> <p>In accordance with clause 8 of SEPP 64, should the application propose the installation of building identification signage, a complete assessment against the objectives of the Policy and the assessment criteria identified in Schedule 1 of the SEPP will be provided within the EIS.</p> <p><b>Randwick LEP 2012</b></p> <p>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). As discussed in <b>Section 6.1</b>, it is not anticipated the proposal will have an adverse impact on these heritage items.</p> <p>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.</p>

## 5. COMMUNITY ENGAGEMENT

The following sections of the report describe the engagement activities that have already been carried out for the project and the engagement to be carried out during the preparation of the EIS.

### 5.1. ENGAGEMENT CARRIED OUT

A Scoping Meeting was held with DPE on 18 May 2021 with attendees including DPE, the project managers Mostyn Copper Group, Urbis, and architect WMK. The meeting discussed the available approval pathways to complete the proposed development, noting the extensive planning history of the site and the previously approved hotel scheme on the site (**Section 1.4**).

An alternative pathway of an Amending DA was discussed, which involved amendments to the existing consent SSD-5002-2011-MOD-1 to make changes to the internal design, proportion of land use, removal of car parking, and consideration of additional permitted land uses. These changes sought to improve the development feasibility of the hotel. Whilst the DPE accepted this is a valid and available planning pathway, it was discouraged due to the complexities of this planning pathway and the extent of changes sought within the revised application.

In accordance with the recommendation provided by the DPE in the Scoping Meeting, this Scoping Report is submitted in respect of a fresh SSDA on the site. To ensure there are not multiple active consents valid on the site, the previous approval will be voluntarily surrendered under section 4.63 of the EP&A Act as a condition of development consent. This will provide sufficient certainty to the ATC, DPE and the community of the future of the site redevelopment.

### 5.2. ENGAGEMENT TO BE CARRIED OUT

In accordance with the DPE's expectations around early and effective engagement for State significant projects, engagement will be carried out prior to lodgement of the EIS and detailed appropriately in the EIS in accordance with the DPE's *Undertaking Engagement Guidelines for State Significant Projects*.

The EIS will outline the detailed engagement strategy for all stages of the planning process and will be supported by a program of targeted engagement to inform preparation of studies and management plans that will accompany the SSDA. Given the high level of visibility of the proposed development footprint on the immediate boundary of Alison Road and the site's listing as an identified State Significant Site, it is likely the project will generate community interest, and the applicant is committed to ensuring the local community is aware of and can comment on the proposal to ensure community views are considered. The geographic extent of this interest will be determined during the engagement process; however, it is likely this will include local interest (< 5km from the site) and some level of regional interest (5-100km from the site).

It is anticipated that the following stakeholders could be engaged at various stages throughout the process (subject to review from an engagement specialist):

- Council
- Government Architect NSW and State Design Review Panel
- Environment, Energy and Science
- Local and state politicians
- Community members/groups
- NSW EPA
- Transport for NSW
- State Transit Authority
- NSW Police Force
- Moore Park Events Operation Group (or relevant Group)
- Centennial Park and Moore Park Trust and Sydney Cricket Ground Trust
- Randwick Collaboration Group

## 6. PROPOSED ASSESSMENT OF IMPACTS

The key planning considerations relevant to the construction and operation of the proposal have been identified below, including a brief discussion of their relevance to the SSDA. The proposed approach to assessing these key considerations within the EIS documentation is outlined below, in addition to the categorisation of impact and the level of assessment as required by the DPE's *'State Significant Development Guide: Preparing a Scoping Report'*.

A Scoping Summary table is provided at **Appendix B**.

### 6.1. MATTERS REQUIRING FURTHER ASSESSMENT

The key planning considerations relevant to the construction and operation of the hotel have been identified below, including a brief discussion of their relevance to the SSDA.

#### 6.1.1. Compliance with Strategic and Statutory Plans

The site is zoned RE1 Public Recreation under the Randwick LEP 2012. The proposed development and the indicative land use currently considered by the applicant include a range of uses, some of which are not wholly permissible on the site. However, noting that these uses would be ancillary to the primary uses which are permissible with consent under the Randwick LEP 2012. In any case development consent may be granted if the development is not considered to be wholly permissible, consistent with section 4.38 EP&A Act.

Furthermore, the proposed development is consistent with the character and operation of the Spectator Precinct, as well as the broader recreation and entertainment precinct. The Randwick DCP 2014 notes that the Spectator Precinct accommodates a range of *"race day, ATC management and entertainment uses"*.

The proposed composition of land uses in the SSDA are consistent with this identified use of the Spectator Precinct and will have no impact on the ongoing race day or ATC management functions of this precinct. The proposal will continue to strengthen the concentration of cultural and recreational uses at Royal Randwick.

#### 6.1.2. Built Form and Urban Design

The Architectural Plans prepared by WMK (**Appendix A**) provide a preliminary indication of the proposed detailed works, building footprints and envelopes that form this SSDA.

The EIS will outline the proposed development in detail, including any site preparation works, proposed building works and works associated with parking and access. The final architectural package and urban design report will detail the rationale for the siting, layout and detailed design of the proposed development. The EIS will address the height, bulk and scale of the proposed development within the context of the locality. As the site is not subject to height or FSR development standards under the Randwick LEP 2012, this will primarily be in the form of a merit-based assessment in accordance with the surrounding context.

The built form of the proposal is largely consistent with the approved SSD-5002-2011. The height and scale of the building envelope is considered acceptable in the context of the surrounding area, which features a range of buildings in various heights such as the recently approved Winx Stand and historic QE II stand on the Royal Randwick site, and the TAFE buildings located to the north-east of the site which are up to 8-storeys in height.

The EIS will also address the design quality with specific consideration of the use of colours, materials, finishes and landscaping. The indicative scheme provides a revised and simplified façade design with prominent façade bays to reduce the dominance of the tower form, increase the permeability of the elevation, and enhance visual and physical connections between the hotel rooms and the racetrack. The articulation of the façade will achieve a recessive visual appearance to ensure the primacy of the racetrack and heritage significance of the members stand is maintained. This design will continue to be refined during the preparation of the SSDA and through the engagement with the State Design Review Panel, as discussed in the following subsection.

Importantly, the EIS documentation will include a response to the Government Architect NSW's draft Connecting with Country Framework.

### 6.1.3. Design Excellence

Clause 6.11 of the Randwick LEP 2012 requires development on sites with an area greater than 10,000sqm and for development that will have a height of greater than 15m to exhibit 'design excellence' in accordance with the relevant matters for consideration outlined in clause 6.11 (4).

The EIS will outline the consistency of the proposed development with the key matters for consideration of clause 6.11 (4).

It is noted that the *NSW State Design Review Panel Terms of Reference* (May 2021) identifies that development declared to be SSD under Schedule 2 of the SRD SEPP is required to be reviewed by the State Design Review Panel (**SDRP**). Accordingly, engagement with the SDRP will occur during the preparation of the EIS and following lodgement of the SSDA where design amendments are required. This will involve an independent review of the application and the receipt of advice on the design quality of the development.

It is noted that the role of the Panel is advisory only and the advice provided will not fetter the independence of the Consent Authority.

This consideration will be assessed utilising a standard level of assessment within the EIS, and a completed Design Review Report will be provided demonstrating how the advice provided by the SDRP has been considered by the applicant.

### 6.1.4. Built and Archaeological 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 and Archaeological Cultural Heritage Assessment Report will accompany the EIS and application, however the following is noted:

- The proposal will provide complementary new facilities that are compatible with the use and significance of the Royal Randwick. The provision of associated services will ensure the ongoing historical racing use of the site and conserve the heritage significance of the site.
- The proposed building would not physically impact or remove any elements on the site which are identified as being of Exceptional or High heritage significance in the existing Conservation Management Plan (**CMP**) for the place (GBA Heritage 2006), with the existing buildings to be removed identified as being of 'Little' significance.
- The hotel is located a sufficient distance away from the heritage-listed Members stand and will not have a direct impact on the significance of this local listed item. The potential visual impact of the new building will be managed through a considered approach to the external design including façade articulation and materiality.
- The proposal is consistent with the CMP (GBA Heritage 2006), as the built form will not interrupt any significant functional and visual relationships between built elements of the site.
- No registered Aboriginal sites or objects are present within the subject area, and no sites or objects were observed during previous site inspections undertaken on the site. Past Aboriginal occupation of the subject area would have been transitory and associated archaeological evidence would at best consist of low-density scatters of lithic artefacts. As the SSDA will involve excavation for the construction of the basement, further consideration of the impact on sub-surface archaeological relics will be provided in the EIS.

The nature of the impact is both direct and cumulative and as such consideration will be assessed utilising a detailed level of assessment within the EIS. This matter will also be addressed and included within specific community engagement conducted for the proposal, during the preparation of the EIS. Specifically, this will include consultation with the Registered Aboriginal Parties prior to the submission of the SSDA to inform the development of any opportunities for heritage interpretation.

### 6.1.5. Access, Traffic and Transport

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 significantly benefited the Royal Randwick site and provides additional travel modes to the benefit of visitors, employees and future



hotel guests. It is therefore anticipated that the modal shift of patrons accessing the venue will comprise a high proportion of public transport and hire vehicle (such as taxi and Uber), and a lower proportion of private car usage.

Accordingly, the proposal seeks to provide a reduced quantum of car parking on the site, to an indicative total of 26 vehicular spaces. Whilst this represents a departure from the Randwick DCP 2014 car parking provision rate, this is considered acceptable as follows:

- The availability of existing parking facilities now provided on site, including on-site parking such as the multi-deck car park (which consistently operates below capacity) and overflow parking on the Infield precinct.
- Operational measures to manage car parking and use of private vehicles by guests and encourage use of public transport options in the surrounding area. It is noted that the porte-cochere, which will provide pick-up and drop-off services for guests is to be retained.
- Proximity and access to public transport, particularly the direct proximity to the CBD Light Rail, regular bus routes and sustainable transport options including walking and cycling paths. We also note the site is approximately 10km (15 minutes) from Sydney airport.

A traffic consultant will also undertake a survey of parking provision in comparable recent hotel development, to illustrate that the provision of a hotel in this highly accessible location will not generate significant vehicle usage to the site.

### **6.1.6. Safety and Security**

The EIS will be accompanied by a Crime Prevention Through Environmental Design Report (**CPTED**) that will outline how the principles (surveillance, access control, territorial re-enforcement and space/activity management) have been integrated into the design of the development to deter crime, manage space and create a safe environment for all who interact with the building, integrated public domain, and its uses.

This consideration will be assessed utilising a standard level of assessment within the EIS.

### **6.1.7. Building Code of Australia and Accessibility**

The proposed development will be designed in accordance with the requirements of the Building Code of Australia and will provide legible, safe and inclusive access for all. This will be addressed within a Building Code of Australia and Accessibility Report which will form part of the EIS documentation.

This consideration will be assessed utilising a standard level of assessment within the EIS.

### **6.1.8. Noise and Vibration**

The proposal includes hotel and motel accommodation, serviced apartments, registered club, and ancillary land uses. The most sensitive land use to noise and vibration proposed on the site will be hotel and visitor accommodation and as such the design of the proposed hotel (particularly the northern and eastern elevations directly adjacent to Alison Road and the Light Rail) will consider incorporation of acoustic materials to ensure internal acoustic amenity is maintained. As such, it is considered that acoustic and vibration impacts resulting from adjacent infrastructure can be mitigated through measures incorporated into the proposal.

This will be further discussed within a Noise and Vibration Assessment submitted with the EIS documentation. The nature of the impact is direct, and as such this consideration will be assessed utilising a detailed level of assessment within the EIS. It is not anticipated that specific community engagement will be required for this matter prior to the lodgement of the SSDA, however the proponent will consult with key stakeholders where required during the preparation of the EIS.

### **6.1.9. Air Quality**

During construction, air quality will be managed through appropriate dust mitigation measures through the use of a Construction Management Plan. The nature of the impact is both direct and cumulative and as such consideration will be assessed utilising a detailed level of assessment within the EIS. This plan will be submitted within the EIS documentation.

## 6.1.10. Construction and Waste Management

A Construction and Demolition Waste Management Plan (**Waste Management Plan**) will be prepared and accompany the EIS. The Waste Management Plan will detail all likely waste streams to be generated during demolition and construction and outline proposed measures to dispose of the waste offsite. A Preliminary Operational Waste Management Plan will also be submitted as part of the EIS and detail proposed waste servicing arrangements, loading zones and ongoing waste management practices to be employed at the site. All demolition, construction and operational waste will be reused or recycled where possible.

A Preliminary Construction and Environmental Management Plan (**CEMP**) will be prepared and provided as part of the EIS. The CEMP will detail:

- Timing of construction works to be undertaken;
- Measures to mitigate ongoing use of the racecourse (such as during race season) and construction activities;
- Construction hours of operation and programme;
- Materials handling strategy;
- Construction traffic, noise, soil erosion, dust control and stormwater management;
- Environmental management strategies during construction; and
- Waste management.

A Construction Pedestrian and Traffic Management Plan will also be prepared as part of the EIS documentation which will outline proposed traffic control plans and truck routes during construction phase of the works.

The nature of the impact is both direct and cumulative and as such consideration will be assessed utilising a detailed level of assessment within the EIS, noting the complexities of managing the cumulative impacts associated with the construction of the proposal, the construction of Night Racing infrastructure and the concurrent use of the site.

## 6.2. MATTERS REQUIRING NO FURTHER ASSESSMENT

**Table 8** below summarises the relevant matters that require no further assessment in the EIS.

Table 8 No additional assessment requirements

Issue	Justification
Hazard and Risks – Bushfire, Coastal hazards, Biosecurity, Land movement	The site is not identified as bushfire prone land.  The site is not in a coastal area.  The existing and proposed operations are not classified as hazardous or offensive development or a biosecurity risk.
Air – gas	The proposed future operation does not emit any gases that warrant assessment such as greenhouse gas.
Air – odour	The proposed future operation will not cause any anticipated odorous issues, and thereby does not warrant further assessment.
Biodiversity	A BDAR Waiver Request to waive the requirement to prepare a BDAR under clause 7.9(2) of the <i>Biodiversity Conservation Act 2016</i> will be submitted following issue of the SEARs.

Issue	Justification
	<p>This is in accordance with clause 7.9(2) of the <i>Biodiversity Conservation Act 2016</i> as follows:</p> <p><i>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.</i></p> <p>A request to waive the requirement to submit a BDAR report will be submitted in light of the following:</p> <ul style="list-style-type: none"> <li>▪ The development is not likely to have any significant impacts on biodiversity values as the development involves works to a highly disturbed and modified site. There are no areas of native or exotic vegetation within or adjacent to the site, and there is no suitable habitat for threatened fauna species associated with the existing structures on site.</li> <li>▪ Any tree removal required for the proposed development would not adversely impact any native animals and plants, including threatened species, populations and ecological communities, or their habitats.</li> </ul> <p>Given the lack of any biodiversity values at the site and the highly urbanised nature of the surrounding area, a BDAR waiver application is considered appropriate for this assessment and will be submitted following issue of the SEARs. Should EES grant a formal BDAR Waiver, this consideration will not be assessed within the EIS documentation.</p>

### 6.3. ANTICIPATED DELIVERABLES

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

- EIS;
- Design Review Report;
- Site Survey;
- Architectural Plans;
- Landscape Plans;
- Overshadowing Plans;
- Urban Design Report;
- Transport and Traffic Impact Assessment;
- Draft Construction Pedestrian and Traffic Management Plan;
- Acoustic Impact Statement;
- Arboricultural Impact Statement;
- Biodiversity Development Assessment Report Waiver;
- Waste Management Plan;
- Flooding Assessment and Civil Report;
- Contamination and Geotechnical Reports;
- Utilities and Infrastructure Management Plan;
- Stakeholder and Community Engagement Plan;
- Heritage Impact Statement;
- Aboriginal Cultural Heritage Assessment Report;
- Historical Archaeology Assessment;
- ESD Report;
- Construction Management Plan;
- Noise and Vibration Assessment;
- BDAR Waiver;

- Social Impact Assessment;
  - Access/ DDA Statement;
  - CPTED Assessment;
  - Cost Summary Statement;
- Consultation Outcomes Report;
  - Owners Consent and required lodgement documentation.

## 7. CONCLUSION

The purpose of this report is to request SEARs for the preparation of an EIS to support the proposed mixed-use development at Royal Randwick. The ATC is committed to working with key stakeholders, including State Government agencies, relevant authorities and the Council to deliver the proposed early works whilst ensuring minimal impact during construction.

This SEARs request outlines the approval pathway for the application, the legislative framework, and the key matters for consideration in the assessment of the application. The EIS will demonstrate how the proposal is suitable for the site and the potential environmental impacts can be appropriately mitigated, minimised, or managed to avoid any unacceptable impacts.

We trust that the information detailed in this letter is sufficient to enable the DPE to issue site-specific SEARs to guide the preparation of the EIS.

## 8. DISCLAIMER

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## **APPENDIX A**

## **INDICATIVE ARCHITECTURAL PLANS**

**APPENDIX B**

**SCOPING SUMMARY TABLE**

