

# **SCOPING REPORT**

**LEGER LAWN**

**ROYAL RANDWICK  
RACECOURSE**

**URBIS**

PREPARED FOR AUSTRALIAN TURF CLUB

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Project Code	P5937
Report Number	Scoping Report – Final

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# 1. INTRODUCTION

This Scoping Report has been prepared by Urbis on behalf of Australian Turf Club (ATC), which owns and operates Royal Randwick Racecourse.

Royal Randwick Racecourse has an extensive history within Australia's racing culture for over 150 years. ATC has a vision to reinforce the reputation of the Royal Randwick Racecourse as a world class racing venue by establishing a new multi-purpose race day facility located within the Spectator Precinct on the current Leger Lawn. The multi-purpose facility will provide a multi-purpose hall, roof-top marquee and food and beverage facilities. The new facility will enhance the spectator experience for general admission patrons and enhance the stature of Royal Randwick Racecourse on the state, national and international stage.

The proposal does not seek to increase the approved patronage numbers to Royal Randwick Racecourse for race day or non-race day events.

In accordance with Part 4 of the *Environmental Planning and Assessment Act 1979* (the EP&A Act), this Scoping Report (previously known as a Request for Environmental Assessment Requirements, or a 'SEARs Request') is to be prepared and submitted to the Department of Planning and Environment (DPE).

Pursuant to Schedule 2 Clause 4 of the State Environmental Planning Policy (State and Regional Development) 2011, the proposed development is considered State Significant Development (SSD), as the proposal will have a Capital Investment Value greater than \$10 million.

The purpose of this report is to provide information to support the request for SEARs. To assist with the DPE's understanding of the proposal, the following information is provided:

- An overview of the site and context.
- An overview of the background discussions held with the DPE.
- Description of the proposed development.
- An overview of the relevant planning framework and permissibility.
- An overview of the likely environmental and planning impacts.
- An overview of the strategy for consultation with stakeholders.

## 2. SITE AND LOCALITY

### 2.1. 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 a major Transport for NSW infrastructure project to establish the CBD and South East Light Rail (CSELR) which is due for completion in mid-2020. The project is in the advanced stages of construction and includes a new light rail station directly opposite the existing Alison Road entry to the Racecourse. The CSELR will be a gamechanger for public transport in the precinct, linking major recreation, education, commercial and residential areas between the Eastern Suburbs and Sydney CBD.

Figure 1 – Regional Context map



Source: Urbis



## 2.2. LOCAL CONTEXT

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 who own and operate the racecourse. The racecourse is located between two key sub-regional road corridors, being Anzac Parade and Alison Road, which are both undergoing significant change due to the light rail construction.

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.

Figure 2 – Local Context Map



Source: Urbis



## 2.3. TRANSPORT

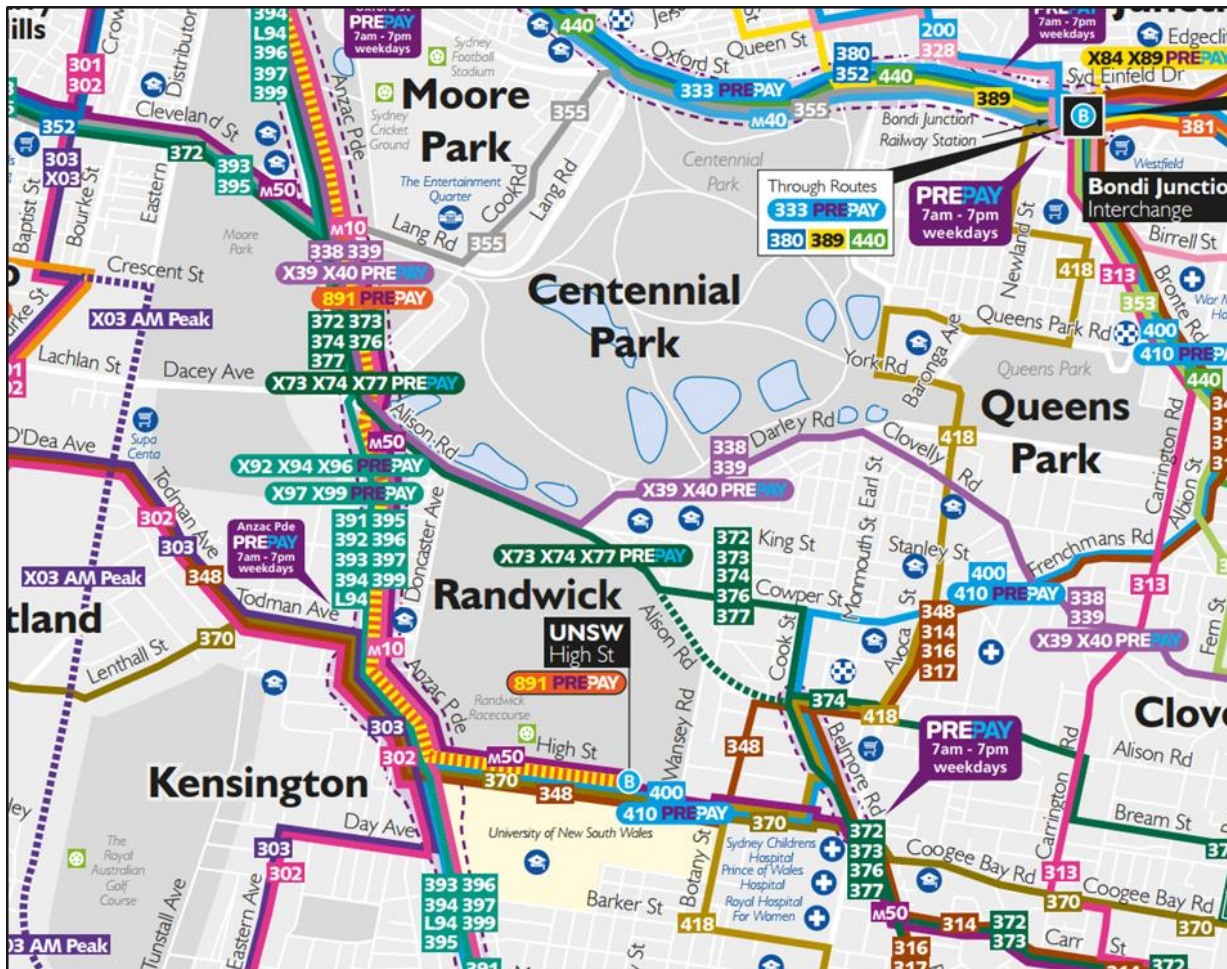
### Road Network

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.

### Existing Public Transport

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.

Figure 3 – Current Bus Services



Source: TfNSW



### 2.3.1. CBD and South East Light Rail (CSELR)

CSELR is currently under construction by Transport for NSW and is expected to be completed in mid-2020. The light rail project will provide 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 will be serviced by two new light rail stations, one on Alison Road opposite the Alison Road entry to the Spectator Precinct, and one on Wansey Road. Two stops located on Anzac Parade are also in comfortable walking distance to the racecourse.

Figure 4 – Extract of the CSELR Route



Source: TfNSW

### 3. BACKGROUND

#### 3.1. EXISTING APPROVAL – MP10\_0097 MOD 2

#### 3.2. RACE DAY EVENTS

The approval allows for the extension of the site boundary to include the whole Spectator Precinct, Services Precinct, and the racetrack Infield Precinct including the QE-II Grandstand. The approval also allows for the use of the land and buildings within the Precincts for non-race day minor events, car parking associated with non-race day events and erection of temporary structures for non-day day events. The approval also allowed for the provision of a restaurant use and private members facility.

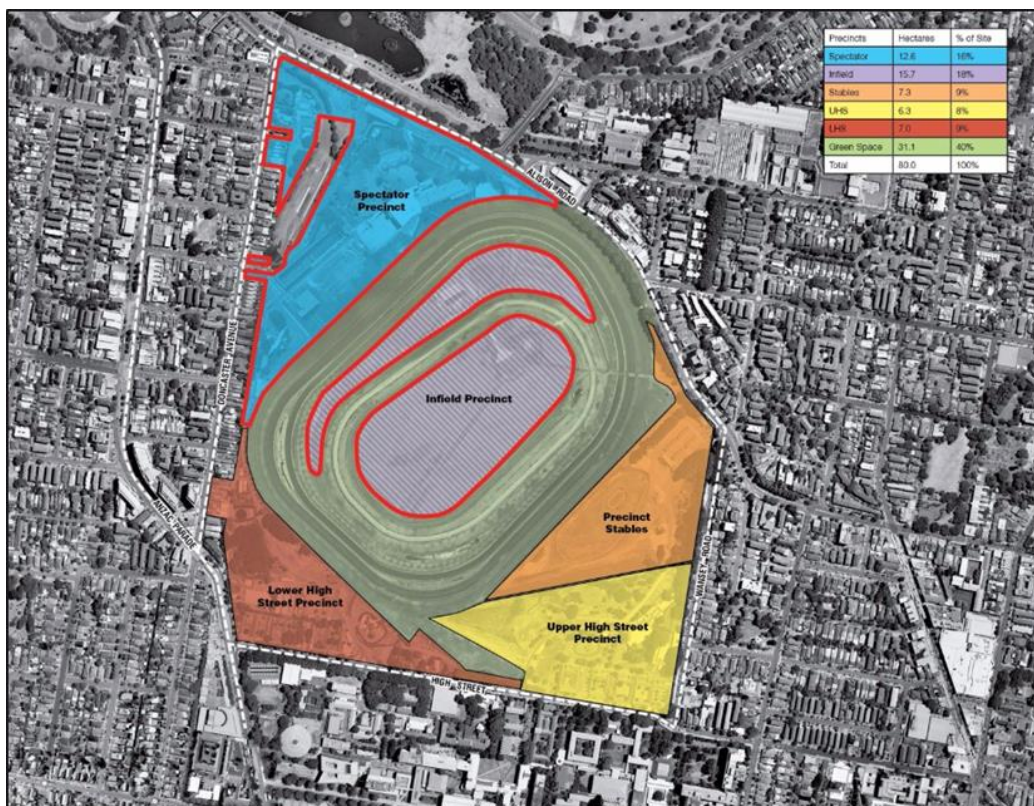
Hours of operation for race day events are from approximately 10.30am – 6.45pm. Minor events will be held between the existing liquor licence up to 2am, 6 days a week and until midnight on Sundays. Non-race day events can effectively operate for 24 hours for preparation and cleaning works etc.

#### 3.3. ONSITE FOR MINOR RACE DAY EVENTS

Under approval MP10\_0097 MOD 2 the Royal Randwick Racecourse can also use the Spectator Precinct for minor events on non-race days: *Use of the land and buildings within the Spectator Precinct, Services Precinct and Infield Precinct for non-race day minor events for up to 5,000 patrons for a duration of no more than 10 days, except for university exams events which may have a duration of no more than 14 days.*

Minor events will be held between the existing liquor licence up to 2am, 6 days a week and until midnight on Sundays. Non-race day events can effectively operate for 24 hours for preparation, cleaning works etc. The proposal is located within the Spectator Precinct as outlined under **Figure 5**.

Figure 5 – Precinct Map



Source: Urbis

### 3.4. SCOPING MEETING

An initial Scoping Meeting was held on 18 March 2019 between the members of the project team and members of the Key Sites team at DPE. The key members from DPE in attendance were:

- David McNamara – Director of Key Sites Assessment
- Cameron Sergeant – Team Leader
- Tim Green – Project Planner

The key areas of discussion during the meeting were in summary:

- Project brief of proposed development.
- Existing approval under MP10\_0097 MOD 2 applicable to the use of the Spectator Precinct for race day and non-race day events.
- Confirmation that the proposed does not seek to increase patron numbers for race day or non-race day events.
- Timeframes of the project from initial scoping meeting to approval.
- Confirm identification of required inputs for SEARs request including:
  - Traffic, parking and transport impacts
  - Acoustic impacts
  - Heritage and view impacts
  - Landscape impacts
  - Engagement and community consultation
  - Safety and Security inclusive of CPTED and Emergency Evacuation
- Discuss the waiver from the standardised SEARs requirements due to existing analysis of subject site not meeting the relevant criteria for:
  - Aboriginal Cultural Heritage Assessment – (ACHAR)
  - Biodiversity Impact Assessment



## 4. PROPOSED DEVELOPMENT

The scope of work for the proposed SSD development comprises:

- Minor excavation and site preparation works.
- Development of one-storey multi-purpose race day facility comprising:
  - Bridge link to existing Queen Elizabeth II Grandstand (QEII) circulation drum.
  - Multi-purpose hall on the ground floor of approx. 4,000m<sup>2</sup> (inclusive of plant rooms approx. 4500 m<sup>2</sup>)
  - Marquee to be provided on level 1 of approx. 20 - 30 metres in width.
  - 'Event' terrace.
  - Formation of a "Eat Street" on the western side of the development
  - Food & beverage facilities.
  - Ancillary uses; and
- Associated landscaping and terrace planting.

The multipurpose facility will enhance patron experience by providing additional viewpoints, amenity spaces and food and beverage facilities. The proposal does not seek to increase patronage numbers to Royal Randwick Racecourse.

The location of the proposal is located on the Leger lawn next to the existing Queen Elizabeth II (QEII) Grandstand within the site as indicated in **Figure 6**. The site of the proposal is approximately 100 x 80 metres in size, which is inclusive of the proposed structure, Eat Street, landscaping and terracing.

Figure 6 – Site plan

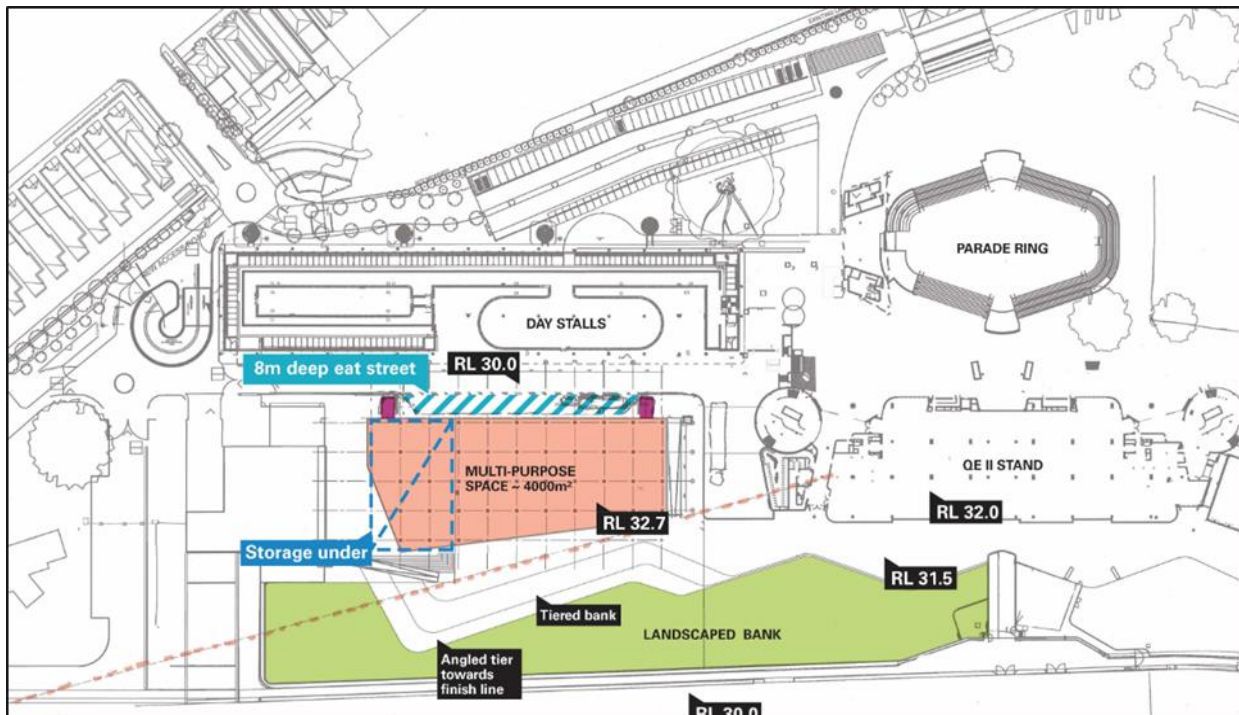


Source: COX



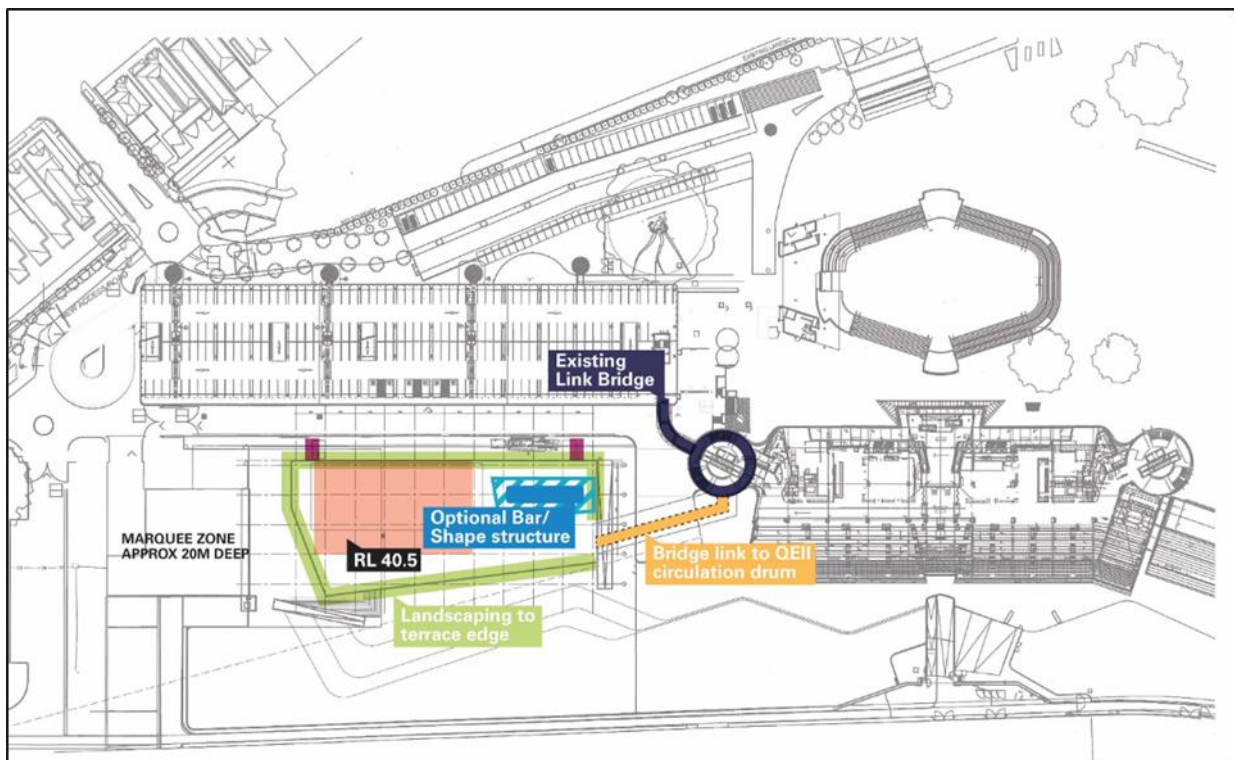
**Figure 7 and 8** provide an indicative concept of the ground and level 1 of the proposed multipurpose race day facility

Figure 7 – Concept Design Ground Floor



Source: COX

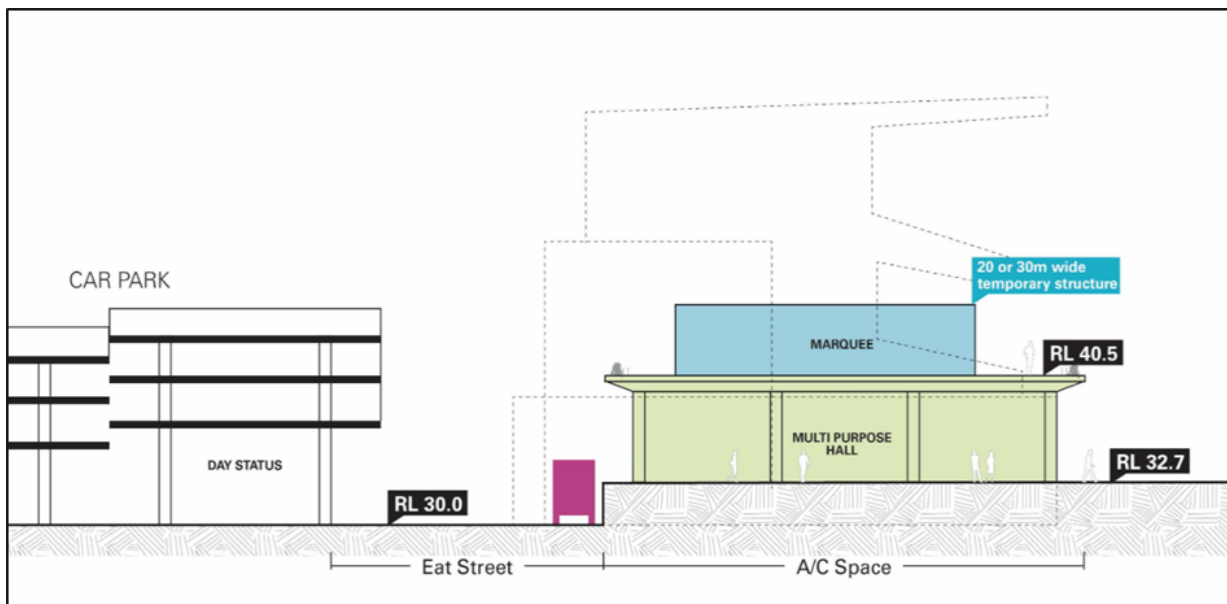
Figure 8 – Concept Plan Level 1



Source: COX

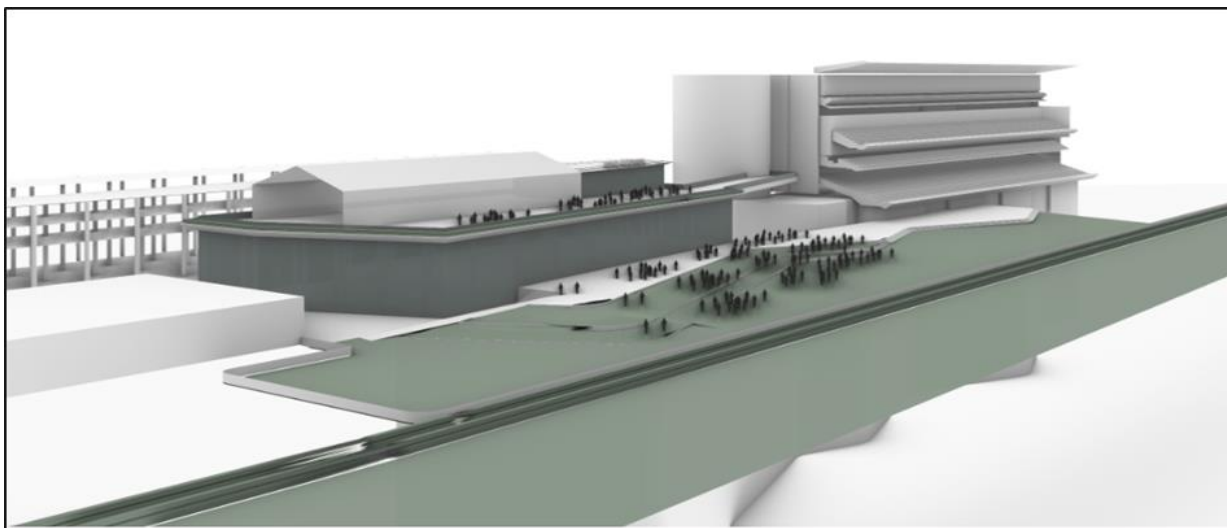
**Figure 9** provides a concept elevation, and **Figure 10** provides a concept visualisation of the proposal.

Figure 9 – Concept elevations of proposal.



Source: COX

Figure 10 – Concept massing visualisation of proposal



Source: COX

## 4.1. CAPITAL INVESTMENT VALUE

The Capital Investment Value for delivering the proposed development is estimated at approximately \$20 million. This will be refined for submission of the SSD application.

## 5. STATUTORY PLANNING FRAMEWORK

The following State and local planning frameworks will be considered as part of the application:

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

### 5.1. ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 (THE ACT)

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.

### 5.2. STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Schedule 3 of the *State Environmental Planning Policy (State and Regional Development) 2011* identifies sites of State Significant Development (SSD).

Pursuant to Schedule 2 Clause 4 of the *State Environmental Planning Policy (State and Regional Development) 2011* (SEPP (State and Regional Development)), the proposed development is considered State Significant Development (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 proposed development would have a capital investment value of approximately \$20 million, and the proposed development site is a State significant identified site, the proposal falls within the provisions of the SEPP (State and Regional Development) and is state significant development to which Part 4 of the Act applies and is to be assessed by Key Sites Assessment.

### 5.3. STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE)

Clause 101 of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) requires that for developments that have a frontage to a classified road, the consent authority must be satisfied that:

(a) *where practicable, vehicular access to the land is provided by a road other than the classified road, and*

(b) *the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of:*

(i) *the design of the vehicular access to the land, or*

(ii) *the emission of smoke or dust from the development, or*

(iii) *the nature, volume or frequency of vehicles using the classified road to gain access*

*to the land, and*

*(c) the development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent 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 proposed development will utilise these.

Notwithstanding, there are no proposed changes to the access points, timing, volume or frequency of vehicle access to the site. Refer to Appendix A of this report for further information.

Clause 104 of the ISEPP 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.

## **5.4. RANDWICK LOCAL ENVIRONMENTAL PLAN (RLEP) 2012**

The *Randwick Local Environmental Plan 2012* (RLEP) is the principle environmental planning instrument applying to the site. The LEP zones the whole racecourse site RE1 – Public Recreation. The site is also identified under the LEP as a '*Heritage conservation area*'.

The proposed development continues the existing racecourse land use on site, 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*

The Royal Randwick Race Course is defined under RLEP as **recreation facility (major)** and **recreation facility (outdoor)**. **Restaurants or cafes** are permissible within the RE1 zone:

***restaurant or cafe** means a building or place the principal purpose of which is the preparation and serving, on a retail basis, of food and drink to people for consumption on the premises, whether or not liquor, take away meals and drinks or entertainment are also provided.*

The other uses which are proposed in the multipurpose race day facility are ancillary uses to the operation of the Royal Randwick Racecourse and can be assessed under section 4.38 of the EP&A Act.



## 6. KEY ISSUES FOR CONSIDERATION

The key issues arising from review of the site context and a preliminary assessment of the proposed development are listed below as follows:

- Traffic, Parking and Transport impacts
- Acoustic impacts
- Heritage and view impacts
- Landscape impacts
- Stakeholder and Community Engagement Plan
- Residential amenity impacts
- CPTED
- Operational impacts

The following assessment reports have been prepared by specialist consultants according to some of the above issues:

- Preliminary Traffic / Parking and Transport Scoping Report Advice – **Appendix A**
- Preliminary Acoustic Scoping Report Advice – **Appendix B**

A summary of the key issues is provided in the following sections of this report.

### 6.1. TRAFFIC, PARKING AND TRANSPORT

Parking & Traffic Consultants (PTC) has provided a scoping statement for the proposed development (**Appendix A**). The scoping statement in summary states:

- *The project will not involve an increase in the permitted patronage of the racecourse.*
- *PTC propose the preparation of current and post development traffic conditions applying a sensitivity test to the potential patronage of the Leger Lawn in addition to the currently recorded patronage levels.*
- *Testing would be undertaken in the context of the CSELR, taxi arrangement and the multi-deck car park.*

### 6.2. ACOUSTIC IMPACTS

GHD has provided a scoping advice for the proposed development (**Appendix B**). The scoping advice in summary states the following methodology is proposed for the acoustic assessment:

- *Determine relevant operational and construction noise emission criteria based on monitoring data available in the public domain in the vicinity of the Randwick Racecourse or from other projects on the site.*
- *Previous noise measurements undertaken at the site for crowd noise, etc. will be used to establish and quantify the operational noise emission sources.*
- *It is assumed that construction staging, hours and equipment details will be provided by ATC. This data will be used to establish relevant construction modelling scenarios.*
- *Undertake operational and construction noise modelling to determine the noise emission from the proposal.*
- *Operational noise will be assessed against the Noise Policy for Industry (EPA, 2017).*
- *Construction noise will be assessed against the Interim Construction Noise Guideline (DECC, 2009).*

- *The increase in road traffic would be assessed for the proposal against the Road Noise Policy (DECCW, 2011). For this assessment existing traffic and traffic generation on the road network would need to be supplied by either ATC or the consultant undertaking the traffic assessment.*

GHD has concluded that should the noise emissions exceed the relevant noise emission criteria, GHD will work with ATC to determine suitable mitigation methods to reduce noise levels to compliant levels.

## 6.3. LANDSCAPE IMPACTS

The Leger Lawn is a wide grass lawn which provides trackside viewing space for general admission patrons to the racecourse during race day events and further provides additional space for temporary marquee structures.

The lawn contains no landscaping elements other than the existing grass lawn. The lawn backs onto the existing Leger Street and multi-deck car park. The proposal will provide visual interest to a presently vacant lawn which will also provide a visual buffer to the existing multi-deck car park.

The proposal incorporates terraced landscaped events platforms and additional minor planting to provide visual interest. The proposal will maintain approximately half of the existing leger lawn for continued patron amenity.

A detailed Landscape Plan will be prepared for the SSDA submission. The proposal is expected to have minimal landscape impacts.

## 6.4. HERITAGE IMPACTS

The location of the proposed development is within the C13 Randwick Racecourse Heritage Conservation Area (HCA), under Schedule 5 of the *Randwick Local Environmental Plan 2012* (LEP). The current Statement of Significance for the HCA, as described on the current State Heritage Inventory listing, is included as follows:

*A number of early buildings surround the historic track itself, while Doncaster Avenue includes some fine groups of nineteenth and twentieth century houses. The Racecourse Precinct includes Randwick Racecourse and all properties on the eastern side of Doncaster Avenue, which adjoin the racecourse at the rear.<sup>1</sup>*

The subject development location is not a listed heritage item. Only one building within the HCA is listed as an individual heritage item, being the Members Stand, located to the north-east of the subject development location, and physically separated by the Queens Elizabeth II Stand.

A Conservation Management Plan (CMP) was last prepared for the Royal Randwick property in 2006 (by Godden Mackay Logan Heritage) to guide the management of its heritage significance. The location of the subject development site does not contain any elements of 'Exceptional', 'High' or 'Moderate' significance, as outlined in the CMP (refer below to Figure 6).

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<sup>1</sup> NSW State Heritage Inventory, Racecourse Precinct Heritage Conservation Area, accessed online at <https://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=2310524>

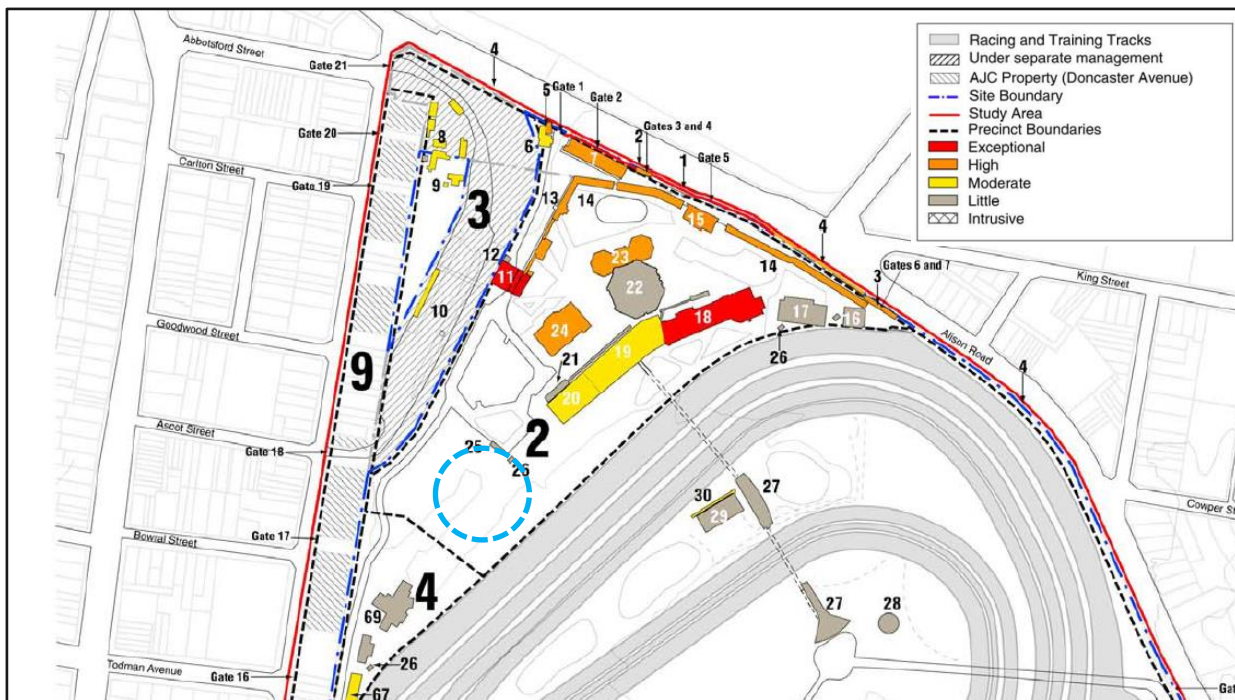


Figure 6 – Extract of the CMP showing elements of heritage significance (subject site indicated in blue)

Source: GML Heritage 2006, p.141

Urbis Heritage has reviewed the preliminary scheme provided and have the following comments regarding the proposed Leger Lawn building.

- The new building will need to respond to the landscape and significant view lines within the site. The preliminary sketches provided indicate that the proposed building is of a relatively low scale and is architecturally modulated. This is acceptable from a heritage perspective within the context of the racecourse, and the new facility will ensure the ongoing significant racing use of the place. The overall proposal is supported from a heritage perspective.
- Visual renders of the proposed development are suggested for the SSD Application package. These should show the proposal in the context of significant view lines, for example, to and from the race track, and the relationship between the new building and the heritage listed member stand at the northern end of the racetrack (where visually possible).

A Heritage Impact Statement will be required to be undertaken as part of the SSD Application package to Randwick Council. The Heritage Impact Statement will assess the proposed development against the relevant provisions of the Randwick LEP 2012 (Clause 5.10), the Randwick Comprehensive Development Control Plan 2013 (Part B2 General Controls and Part E Specific Sites – Royal Randwick Racecourse), as well as the policies outlined in the current CMP.

Conditions of consent may include an archival recording of the general location and setting prior to works being undertaken, or some form of site interpretation to be integrated into the new building.

## 6.5. RESIDENTIAL AMENITY IMPACTS

The primary goal of the Royal Randwick Racecourse is enabling the day to day operations to coexist with the local residents in the community.

The closest residential dwelling is approximately 85 metres away from the existing Leger Lawn. Furthermore, the existing multi-deck car park acts as a visual and acoustic buffer to the residential receivers.

The proposal is anticipated to have a minimal impact on surrounding residential receivers.

## 6.6. CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN (CPTED)

The proposal will ensure that all matters for consideration under CPTED are optimised through safety and security measures. Royal Randwick Racecourse presently operates with 24 hour onsite security.

A CPTED assessment is anticipated to be provided as part of the SSDA submission.

## 6.7. OPERATIONAL IMPACTS

The proposal will operate within the existing hours of operation for race day events which are from approximately 10.30am – 6.45pm. Minor events will be held between the existing liquor licence up to 2am, 6 days a week and until midnight on Sundays. Non-race day events can effectively operate for 24 hours for preparation and cleaning works etc.

An Operations Plan of Management will be provided as part of SSDA submission, which will cover the following:

- Potential Impacts on residents
- Noise Control
- Odour Control
- Cleaning and Waste Management Plan
- Responsible Service of Alcohol
- Community engagement and complaints
- Site Activities & Events
- Staffing Management
- Hours of Operation

The proposal will operate within the existing approved operations for the Spectator Precinct.

## 6.8. STAKEHOLDER AND COMMUNITY CONSULTATION

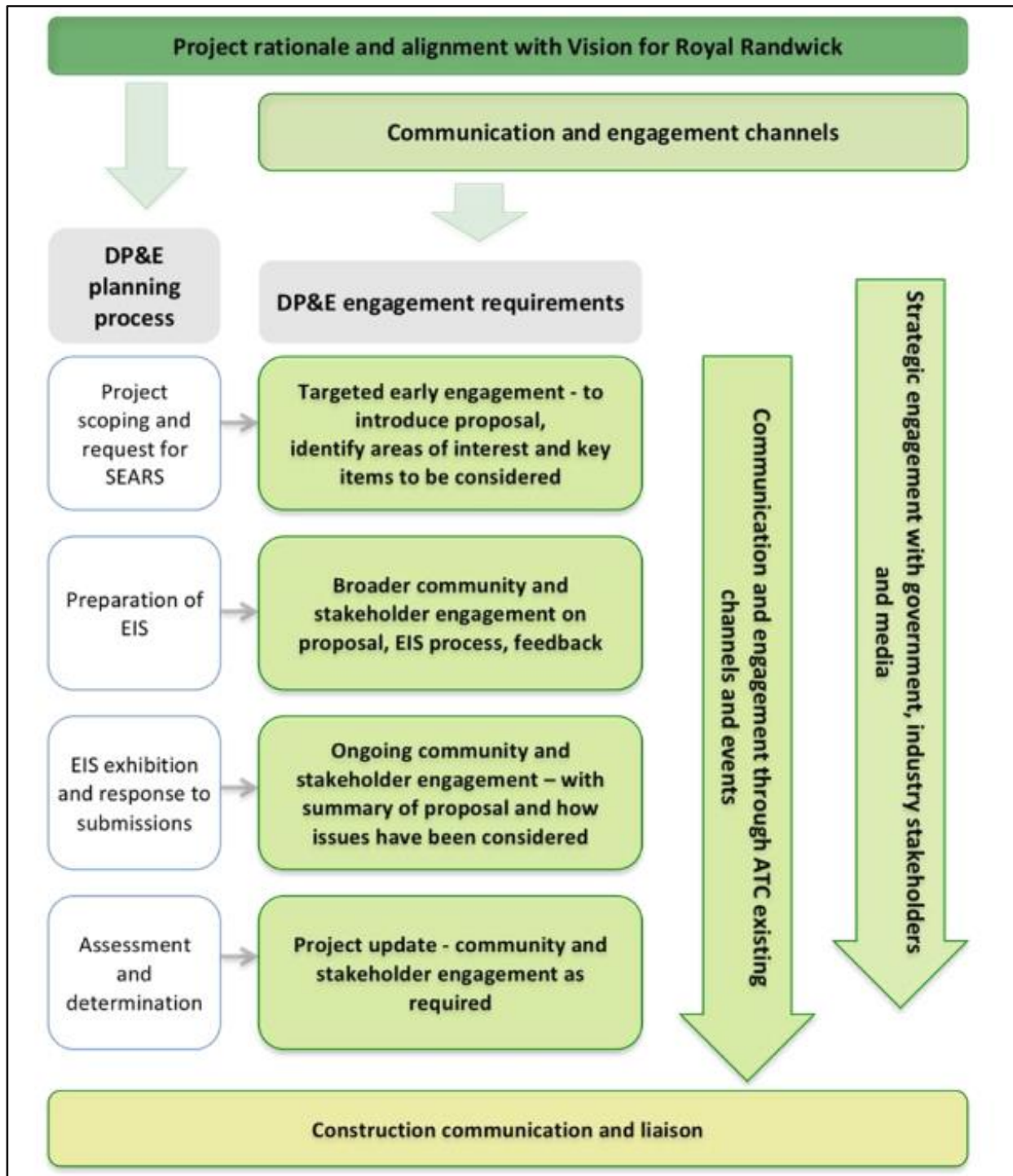
The applicant will undertake engagement with key stakeholders and local residents surrounding the site. The key stakeholders to be targeted during the scoping stage of the SSD:

- Centennial Park and Moore Park Trust
- Department of Planning and Environment, Planned Precincts Team
- Greater Sydney Commission, Randwick Collaboration Area
- Kensington Chamber of Commerce
- Prince of Wales Hospital and Children's Hospital
- Randwick City Council
- Randwick TAFE
- Roads and Maritime Services
- Sydney Light Rail
- Transport for NSW
- University of NSW.

**Figure 12** outlines the broader engagement strategy to be undertaken during the preparation of the SSD application.



Figure 7 - Extract of engagement framework



## **7. REQUESTED WAIVERS**

### **7.1. BIODIVERSITY IMPACT 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 Assessment Report (BDAR) where required. The site does not contain any environmentally sensitive land and the site is not identified as containing terrestrial biodiversity as per the RLEP 2012,

A waiver is requested from the SEARs to require the preparation of a Biodiversity Assessment Report.

If a waiver is unable to be received upon the lodging of this Scoping Report a submission will be made prior to or with the EIS requesting a waiver to preparing a biodiversity development assessment report, as per cl 7.9 of the Biodiversity Conservation Act 2016 (The Act).

### **7.2. ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT – (ACHAR)**

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* (NPW Act) including the preparation of an Aboriginal Cultural Heritage Assessment (ACHA) and consultation with the Aboriginal community.

A waiver is requested from the SEARs to require the preparation of an ACHA on the following basis:

- Disturbance from the proposed development will have very localised impact on the existing ground surface in the forms of structural pylons. No major underground works proposed in form of below the ground level or car park.
- High level of disturbance of the Randwick Racecourse Precinct was recorded by an Aboriginal Heritage Impact Assessment (AHIA) prepared by Archaeological & Heritage Management Solutions (AHMS) in 2010. The AHIA concluded that historical land use including the impact of the construction and ongoing maintenance of the Randwick Racecourse precinct have altered the original landscape and removed the original soil profile within the Subject Area. The AHIA also concluded that the location of the Subject Area has low level of Aboriginal archaeological potential.
- If a waiver is not granted, the SSD will be lodged without the ACHA being fully completed.

## 8. CONCLUSION

This report has provided an outline of the proposed SSD development for a multipurpose facility will provide a multi-purpose hall, marquee and food and beverage facilities. The new facility will enhance spectator experiences and enhance the stature of Royal Randwick Racecourse on the state, national and international stage. This Scoping Report has included preliminary consideration of the key issues to assist the DPE in the preparation of the SEARs.

In summary, the key issues identified during scoping are considered to be:

- Traffic, Parking and Transport impacts
- Acoustic impacts
- Landscape impacts
- Heritage and view impacts
- Stakeholder and Community Engagement Plan
- Residential amenity impacts
- CPTED
- Operational impacts

Urbis is looking forward to working with the DPE and receiving SEARs for the proposed SSD.

# **APPENDIX A      PRELIMINARY TRAFFIC / PARKING AND TRANSPORT ADVICE**



# **APPENDIX B      PRELIMINARY ACOUSTIC SCOPING ADVICE**





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