



# ROYAL RANDWICK RACECOURSE SSD-10285 WINX STAND

Response to request for additional information  
June 2020

Prepared for  
**AUSTRALIAN TURF CLUB**  
18 June 2020



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# 1. INTRODUCTION

This response to the 'Request for additional information' (RFI) addresses the submissions prepared by public agencies following the first Response to Submissions' Report (RtS) for the Winx Stand at Royal Randwick Racecourse, Randwick (SSD 10285). The additional submissions were received from the following:

- Randwick City Council (RCC)
- Environment, Energy and Science (EES)
- Sydney Water

No further submissions have been received regarding SSD 10285 and no objections have been received. The key matters raised in the agency submissions include:

- Landscaping
- Architectural design
- Recommended draft conditions
- Sewer and water services

This response to the RFI incorporates amendments to the proposed design to address the issues raised and following a further detailed design process. Principally, these amendments relate to the following:

- Revised Level 1 and roof design to the north west corner of the proposal.
- Incorporation of an additional tree in the north west corner of the proposal in response to landscaping comments.

These amendments are presented in updated Architectural Plans (Appendix A). No changes have been made to the Landscape Plans. However, this report documents recent discussions with EES relating to their submission on landscaping and the applicant's response, including recommended conditions of approval for consideration by the DPIE.

Further sewer and water servicing information is provided in response to Sydney Water's submission and is provided as Appendix B.

The amended plans and the response to the RFI demonstrate that the proposal balances environmental impact with community benefit and should be approved. This response to the RFI and assessment of the amended plans confirm that there are no significant adverse impacts associated with the project.

The specialist consultants have assessed the design and recommended mitigation measures to ensure the proposal will have no unreasonable or significant noise, traffic and environmental impacts on adjoining or surrounding properties or the public domain.

The content contained in this response to the RFI should be read in conjunction with the previous RtS and the original EIS, and demonstrates that the application should be approved. This project is fully funded and 'shovel ready' for commencement of construction as soon as possible this year – to take the opportunity for construction whilst large scale events are currently restricted in these challenging times. The project will deliver genuine economic benefits as during the recovery from COVID, particularly in creating over 150 full-time jobs during construction, and will sustain many direct and indirect jobs during its operation once the current COVID related restrictions are lifted. It has also addressed all outstanding issues and will result in a great new facility that the public will be able to enjoy. Therefore, this proposal warrants being fast-tracked for approval.

## 2. OVERVIEW OF AMENDMENTS TO THE PROPOSAL

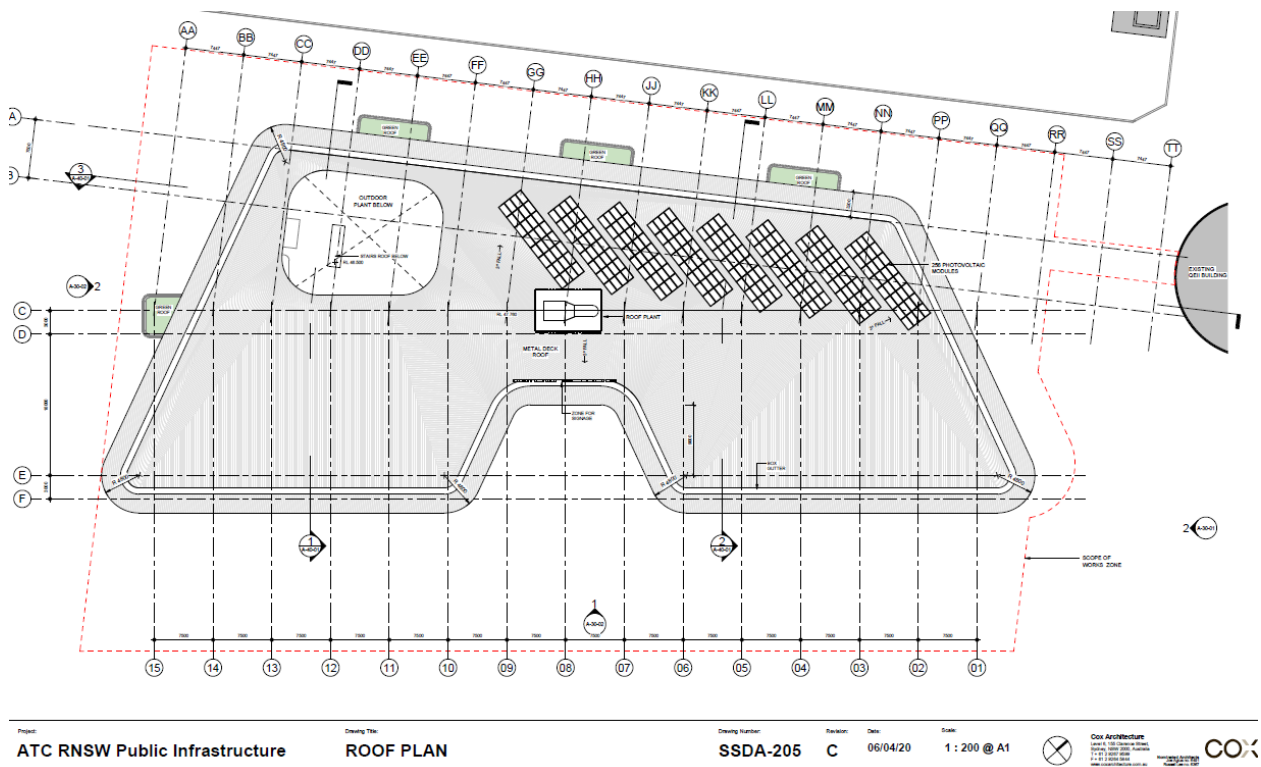
Through the progression of the detailed design process for the proposal, the project team has identified some minor changes to the design for efficiency. These changes are documented in the revised Architecture Plans (Appendix A) by Cox Architects and are summarised as follows:

- Roof design amended at the north west corner of the proposal, with a lower roofline for the back-of-house area.
- Tree added to the north west corner, near the proposed loading dock as requested in submissions.
- Clarification on the design of the trackside path/ramp.
- Minor aesthetic design changes to the proposed Winx Stand.
- All plan numbers have been revised as follows:
  - SSDA-001 – D
  - SSDA-102 – D
  - SSDA-201 – E
  - SSDA-202 – D
  - SSDA-203 – D
  - SSDA-204 – D
  - SSDA-205 – E
  - SSDA-301 – D
  - SSDA-302 – D
  - SSDA-401 – D
  - SSDA-701-723 – D
  - SSDA-801 – C
  - SSDA-811 – D

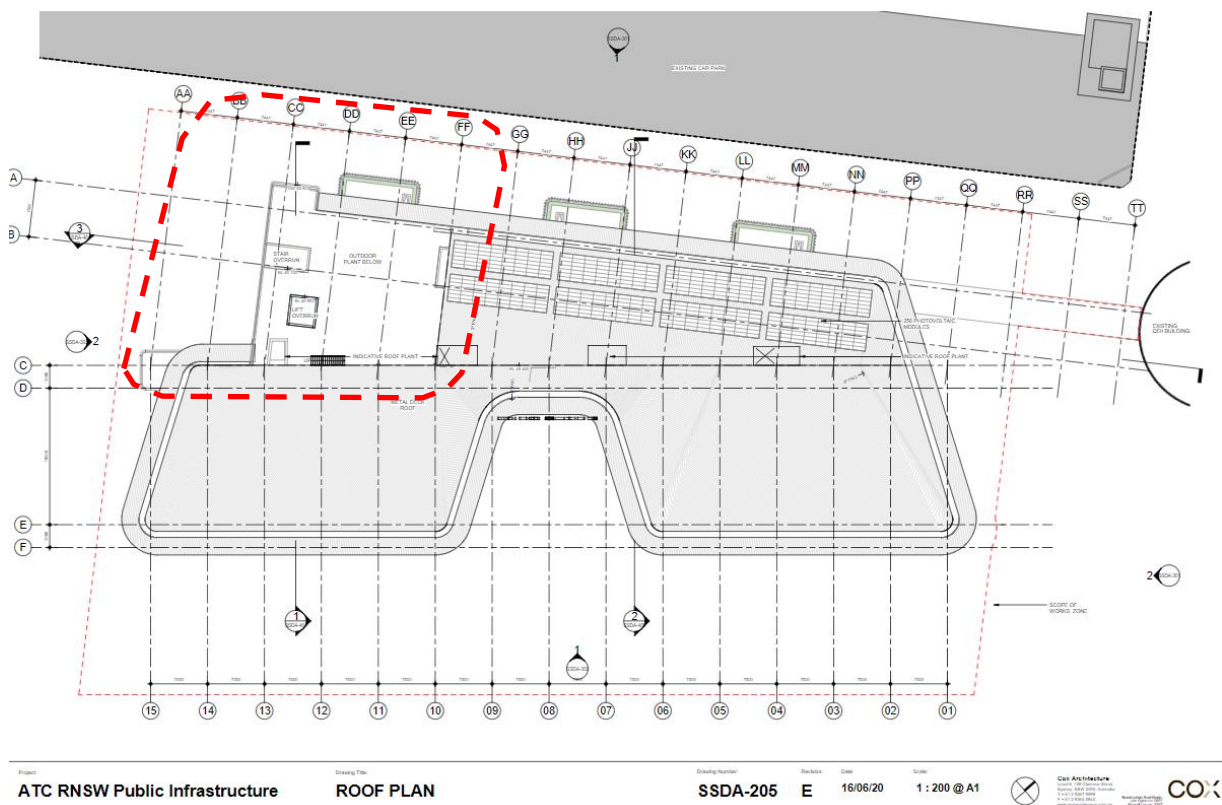
All plans not listed above remain unchanged from the previous issued plans.

Figure 1 illustrates the proposed amended roof design in comparison to the design submitted with the RtS in April 2020.

Figure 1 Comparison of the Roof design for the previous and revised design



Picture 1 Previous design of Roof



Picture 2 Revised design of Roof

Source: Cox Architects

# 3. ASSESSMENT OF PROPOSAL AMENDMENTS

## 3.1. AMENDED ROOF DESIGN – ‘BACK OF HOUSE’

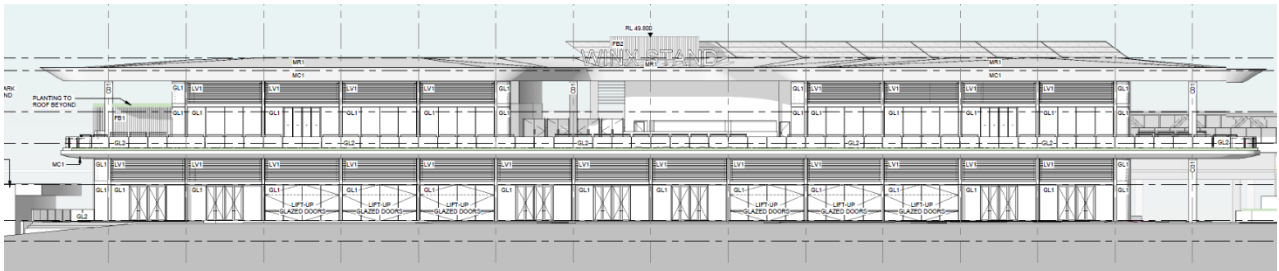
The roof design of the proposal has been amended at the north west corner of the structure, fronting the rear lane. The proposed design changes are to simplify the construction method and provide a more efficient and affordable outcome in response to the current economic climate. Aesthetic changes have also been made in response to comments from GANSW.

Figure 2 illustrates how the roof design changes will result in an outcome that maintains the design elements visible to the public domain, attending patrons and the general public. Proposed changes to the roof design are located at the rear of the proposal and only visible to servicing areas at the back of house not accessible or visible to the public.

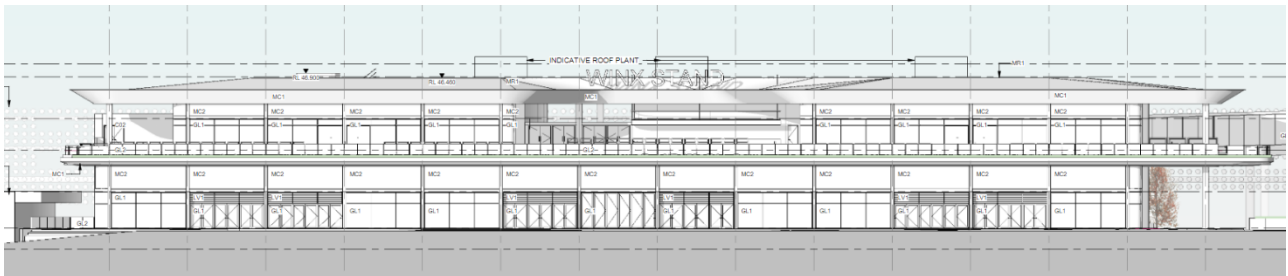
The proposed changes to the roof design maintain the incorporation of solar panels to enhance the new facility's energy efficiency and sustainability.

The following Figures 2 - 3 have been provided as a comparison between the original design and the revised design for the north and south elevations. This is supported by Figure 5, which provides a comparison of renders of the north west corner of the proposal for the previous design and the proposed revised design supporting this RFI.

Figure 2 Comparison of the previous and revised design of the south elevation



Picture 3 Elevation of previous design

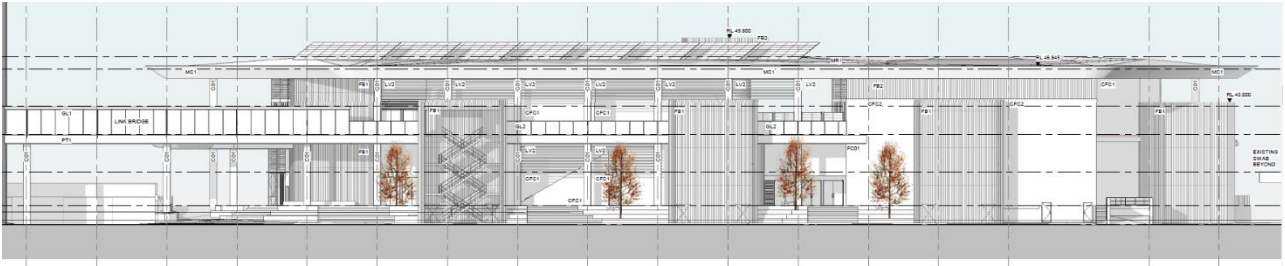


Picture 4 Elevation of revised design

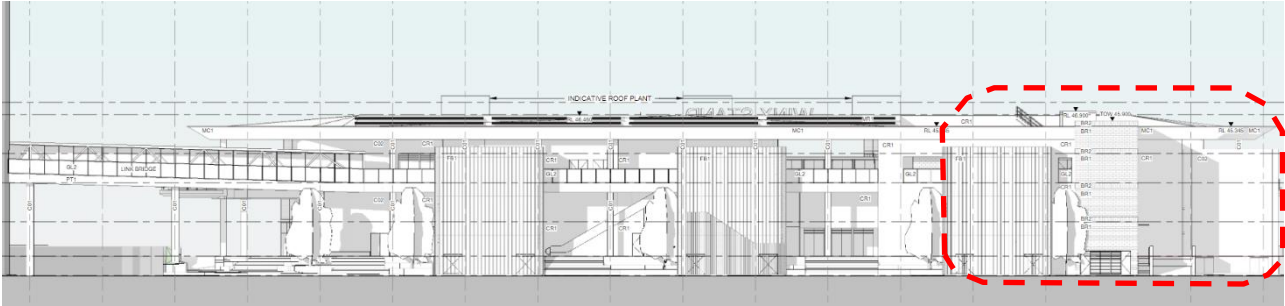
Source: Cox Architects



Figure 3 Comparison of the previous and revised design of the north elevation



Picture 5 Elevation of previous design

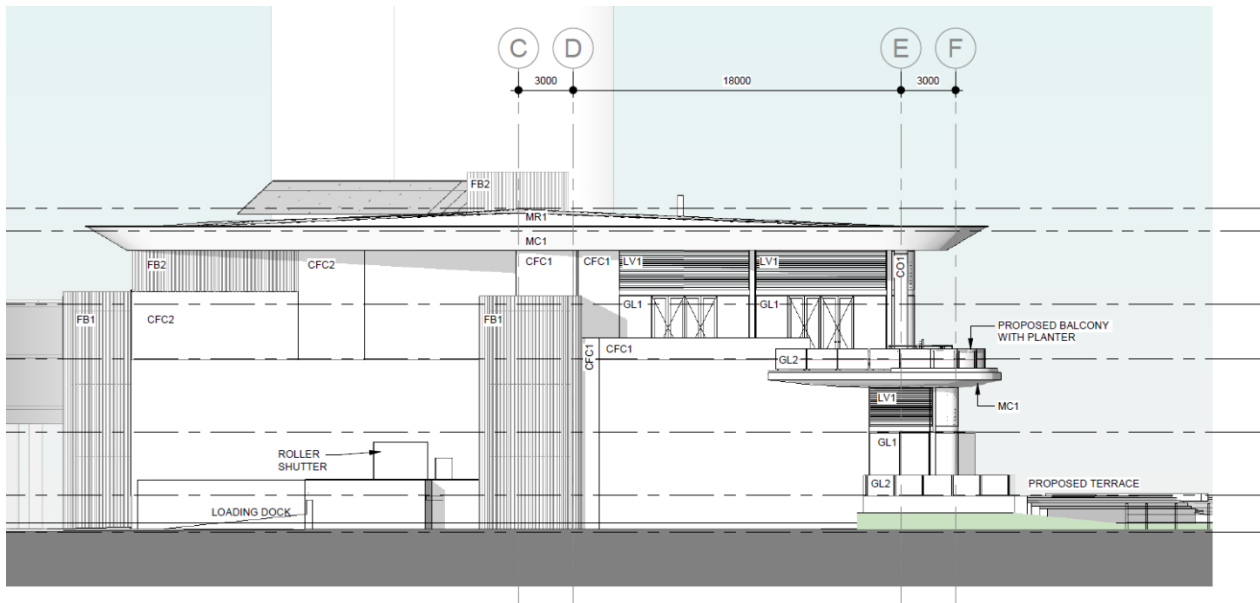


Picture 6 Elevation of revised design

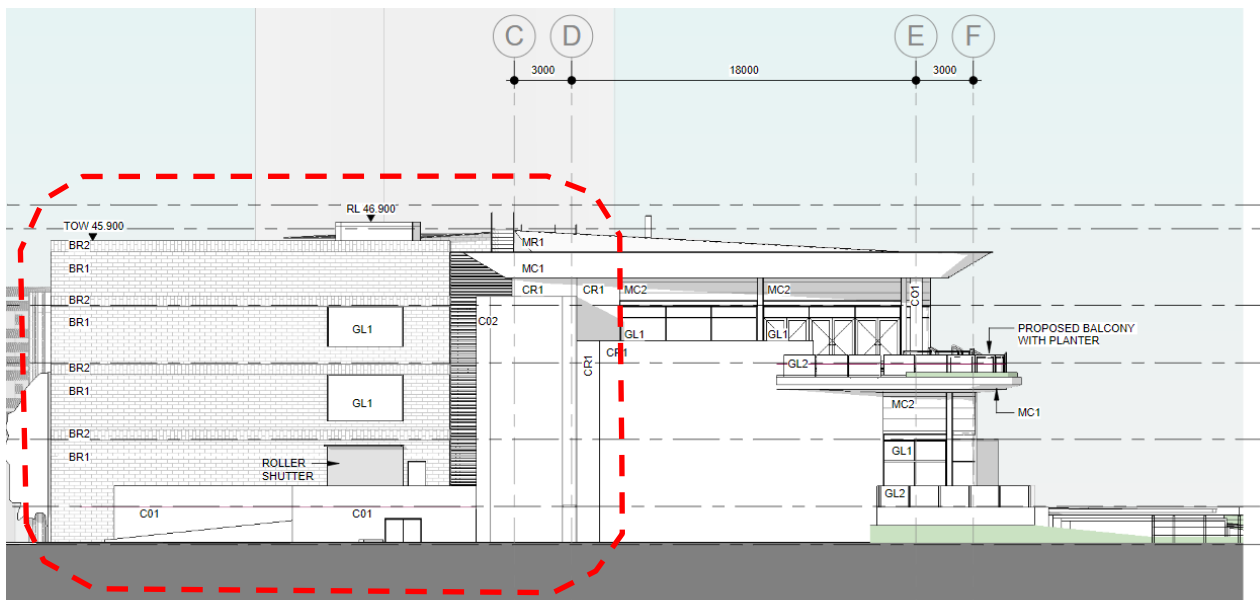
Source: Cox Architects



Figure 4 Alternative design review comparing the original design and revised design 2 of 3



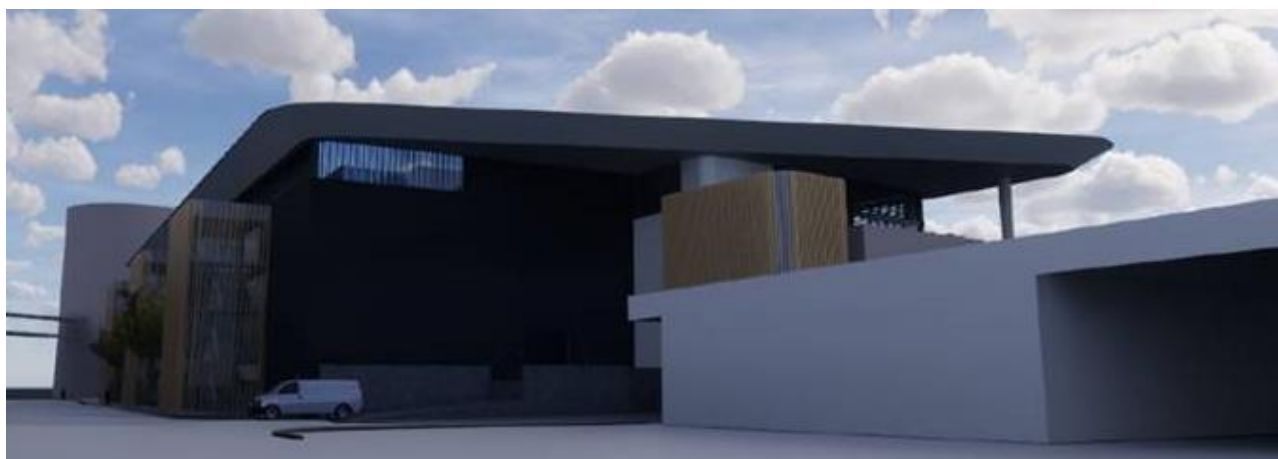
Picture 7 Original design (west elevation from racecourse proper)



Picture 8 Revised design (west elevation from racecourse proper)

Source: Cox Architects

Figure 5 North west corner design change comparison



Picture 9 Previous design proposal - RTS



Picture 10 Revised design proposal – RFI

*Source: Cox Architects*

The revised roof design can be seen in Picture 9 from the laneway looking north. The west elevation has been amended to simplify construction of the roof and the internal configuration of the back-of-house area. The southern elevation is now complimented with a brick façade to provide an interesting and attractive aesthetic to the rear laneway and loading dock. The addition of windows on the façade aligned with the lift lobbies on each floor provide improved internal natural lighting and presents the opportunity for, or appearance of passive surveillance in the laneway.

An additional tree has also been included at this corner of the site in response to comments from Randwick City Council and in consultation with, to soften the appearance of the built form.

## 3.2. LANDSCAPING

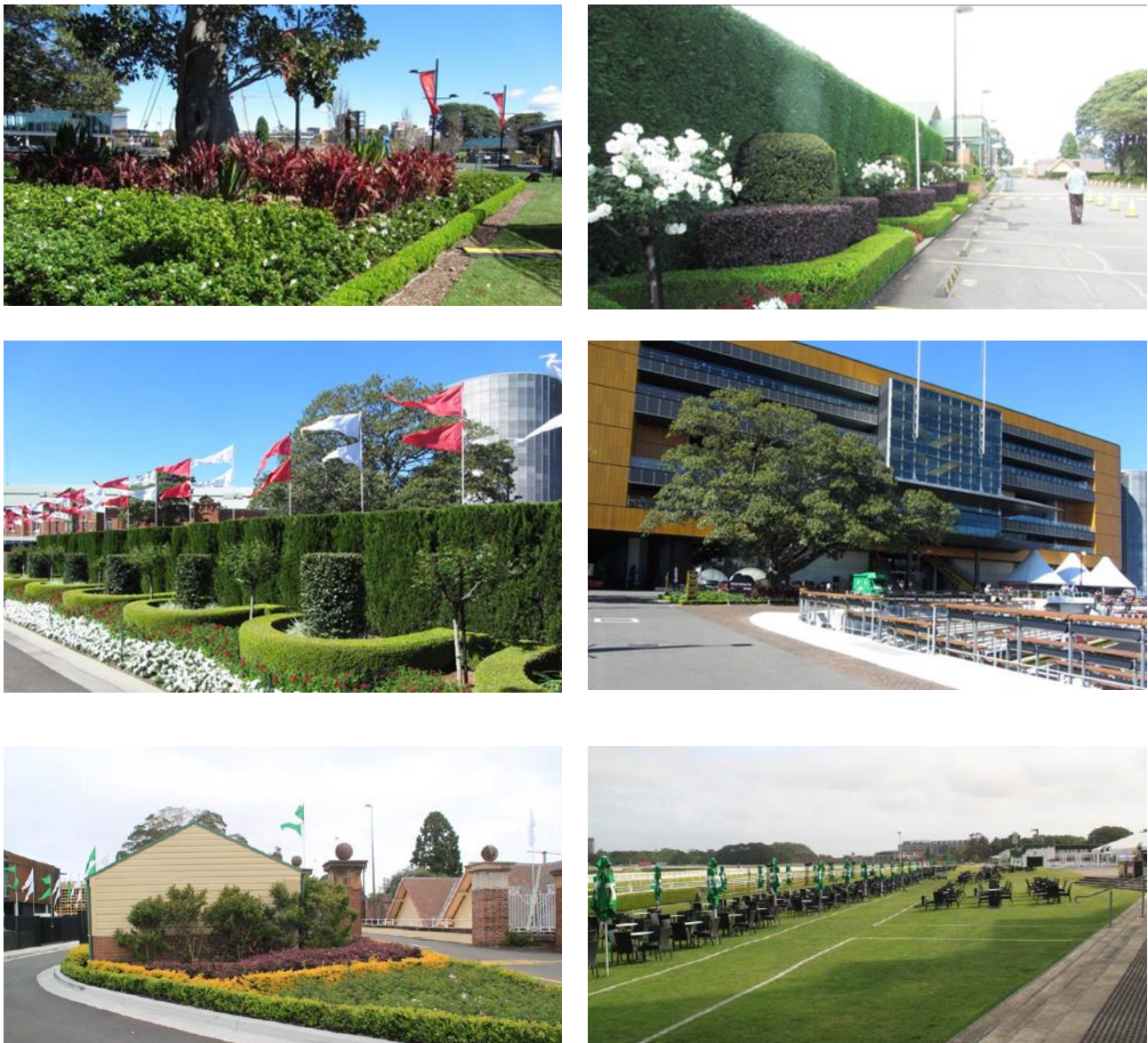
The additional submissions received in relation to SSD 10285 are summarised and responded to in Table 3 in Section 4.2 of this response. This section responds to the second submission prepared by NSW Environment, Energy and Science (EES), in greater detail. During the preparation of this response to the RFI, Sturt Noble Landscape Architects (SNA) contacted EES during May 2020 to discuss the submission comments and identify an acceptable outcome.

The Winx Stand will be part of the existing Spectators precinct at the Royal Randwick Racecourse. The existing landscape in this area is very distinct and of cultural heritage. Figure 6 shows the existing planting within the Spectators precinct. The planting is very formal and consists of predominately exotic species with tight forms, vibrant colours / floral displays, that are highly manicured into formal planting designs.

EES's suggestions to incorporate native provenance plants into the design are understood. However, the Eastern Suburbs Banksia Scrub and its species completely contrast to the existing Spectators precinct. The use of these species only will not allow the Winx Stand to integrate into the cultural heritage or the broader landscape of the Spectators precinct.

An alternative planting palette for the Winx Stand is proposed that consists of a mix of select species from the Eastern Suburbs Banksia Scrub intermixed with species already used at the site so the proposed landscaping will be in keeping with the Spectators precinct at the Racecourse.

Figure 6 Royal Randwick Racecourse – Site photos



Source: SNA





Source: SNA



To maintain the character of the racecourse, SNA has provided the following responses to EES to provide the best outcome that is in keeping with the proposal's setting, and incorporate native provenance plants into the design.

Table 1 Response to EES submissions

	EES RTS RESPONSE	ATC RFI RESPONSE
a)	<p>The EES submission of 27 November 2019 on the EIS advised the Indicative Planting Schedule incorporates an invasive exotic species (Indian Hawthorn - <i>Raphiolepis indica</i>) and exotic species, such as:</p> <ul style="list-style-type: none"> <li>▪ Red Hot Poker - <i>Kniphofia uvaria</i> 'Flamenco'</li> <li>▪ Japanese Box – <i>Buxus japonica</i></li> <li>▪ 'Magnifica' Gardenia - <i>Gardenia augusta</i></li> </ul> <p><i>The Summary of Submissions in the RTS (Table 7) does not specifically provide a response to the EES comments in relation to the proposed use of these plant species, instead it refers to item 8 in Table 7 (see pages 35-36 of RTS) which is a response to Randwick City Council's submission. The indicative planting schedule in the Revised Landscape Plan and the amended indicative planting schedule in the RTS still propose to use Indian Hawthorn (Figure 4, see page 8 of RTS). As the fruit of Indian Hawthorn is easily dispersed by birds and Indian Hawthorn is a problem in remnant bushland in the Sydney region, EES recommended it not be used in the Landscape Plan, especially as the site is near Centennial Park which contains Eastern Suburbs Banksia Scrub which is critically endangered. EES repeats this recommendation.</i></p>	<p>The RtS proposed substituting the invasive <i>Raphiolepis</i> with <i>Raphiolepis springtime</i> which is a non-invasive cultivar.</p> <p>To address this comment, all <i>Raphiolepis</i> species can be removed from the planting palette.</p> <p>The following local provenance trees, shrubs and groundcovers are proposed to be incorporated into the planting palette:</p> <ul style="list-style-type: none"> <li>▪ <i>Actinotus minor</i></li> <li>▪ <i>Banksia integrifolia</i></li> <li>▪ <i>Darwinia fascicularis</i></li> <li>▪ <i>Dianella revoluta</i></li> <li>▪ <i>Hardenbergia violacea</i></li> <li>▪ <i>Hibbertia fasciculata</i></li> <li>▪ <i>Melaleuca squamea</i></li> <li>▪ <i>Pomax umbellata</i></li> </ul>
b)	<p><i>EES notes the Revised Landscape Plan has removed Red Hot Poker from the plant species list but exotic species such as Japanese Box and 'Magnifica' Gardenia are still proposed to be used. It is noted however that Buxus sp. are to be used on level 1 of the Winx Stand as a formal hedge and the RTS states it is not invasive (page 52 of RTS). The EES submission did not state that Japanese Box was invasive but rather that it is an exotic species (i.e. non-native). Where landscaping is proposed at ground level it is recommended local native provenance plants are used.</i></p>	<p>Noted. It is confirmed that the use of Japanese box is only proposed in the planters on level 1, and not at ground level.</p> <p>Regarding the use of local native provenance plants (Eastern Suburbs Banksia Scrub species) at ground level please refer to our response for Recommended Conditions of Consent 1 below.</p>
c)	<p><i>EES previously noted the proposed use of non-local native species such as the Firewheel tree (<i>Stenocarpus sinuatus</i>) and recommended the landscaping at the site uses a diversity of native trees, shrubs and groundcover species from the relevant local native vegetation communities (local provenance material) that once occurred in this locality (rather than use exotic species and non- locally occurring native species). The RTS states "it is proposed the Queensland Firewheel Trees are changed to Banksia integrifolia floribunda 'Sweeper' (see Table 7, page 27) but the indicative planting schedule in the Revised Landscape</i></p>	<p>Noted. Propose replacing the Firewheel tree (<i>Stenocarpus sinuatus</i>) with <i>Banksia integrifolia</i> which is a local native species and part of the Eastern Suburbs Banksia Scrub species as requested</p>

	EES RTS RESPONSE	ATC RFI RESPONSE
	<i>Plan and the amended indicative planting schedule in the RTS do not reflect this, as they still propose to use Firewheel Trees (Figure 4, page 8 in RTS). It is recommended the Department clarifies with the proponent whether it is proposed to remove the Firewheel tree from the planting schedule.</i>	
d)	<i>The EES submission recommended the development replaces any removed trees at a ratio greater than 1:1 to mitigate the urban heat island effect. The RTS confirms that “no trees are proposed to be removed and that the three (3) Magnolia Little Gems are to be relocated and five (5) new canopy trees are proposed to be planted” (page 28). EES recommends the new canopy trees to be planted are local provenance native species.</i>	Noted. Propose trees species will be amended to <i>Banksia integrifolia</i> .

To avoid unnecessary delay to the assessment of SSD 10285, it is proposed that DPIE considers suitable conditions of consent that require the Landscape Plans to be amended prior to the issue of a construction certificate. The table on the following page provides a response to the recommended conditions previously provided by EES.

Table 2 Response to EES recommended conditions of consent

	RECOMMENDED CONDITIONS OF CONSENT	SNA RESPONSE	EES RFI RESPONSE	SNA PROPOSED RFI RESPONSE
1a	Invasive exotic species are removed from the Landscape Plan and replaced by a diversity of local native provenance trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community which once occurred in this locality.	<p>The Landscape plans prepared by SNA have been amended to remove invasive exotic species from the plant list.</p> <p>Buxus sp. has been retained on level 1 of the Winx Stand as this species is ideal for its use as a formal hedge, is not invasive and is used throughout the Racecourse.</p>	The RTS notes the Landscape plans prepared by SNA have been amended to remove invasive exotic species from the plant list (Table 8, page 52) but according to the indicative planting schedule in the revised Landscape Plan and the amended indicative planting schedule in the RTS, the proponent still proposes to use Indian Hawthorn (Figure 4, page 8 of RTS). EES repeats its recommendation that invasive exotic species are removed from the Landscape Plan.	<b>The original recommended condition of consent is accepted, but should be amended to have a requirement to be satisfied prior to the issue of a construction certificate.</b>
2	Trees removed, shall be replaced at a ratio greater than 1: 1.	<p>This condition is unnecessary. The landscape plans indicate three (3) trees are to be relocated (not removed) and five (5) new trees will be planted.</p> <p><b>Request draft condition is deleted.</b></p>	Table 8 in the RTS confirms that the existing exotic 3 trees are not to be removed and that 5 trees will be planted (page 53). EES recommends the planted trees are local provenance native species.	<p>Noted. Proposed trees species can be amended to <i>Banksia integrifolia</i>. Refer to comments for condition 5b.</p> <p><b>The original recommended condition of consent is unnecessary but is accepted.</b></p>
3	Enough area/space is provided on site to allow the trees to grow to maturity.	<p>Duplicate condition as per item 5(e) below.</p> <p><b>Request draft condition is deleted.</b></p>	The RTS requests that this draft condition is deleted as it is a duplicate condition as per item 5(e) below (page 53). EES agrees to this.	<b>EES agrees to removal of condition.</b>



	<b>RECOMMENDED CONDITIONS OF CONSENT</b>	<b>SNA RESPONSE</b>	<b>EES RFI RESPONSE</b>	<b>SNA PROPOSED RFI RESPONSE</b>
<b>4</b>	Tree planting at the site shall use advanced and established trees with a minimum plant container pot size of 75-100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed.	<p>This condition is unnecessary. The landscape plans indicate all trees are proposed to be 100L container size. Recommend this is incorporated into a standard condition requiring landscaping to be completed in accordance with the approved landscape plans.</p> <p><b>Request draft condition is deleted.</b></p>	The RTS notes this condition is unnecessary and requests it is deleted as the landscape plans indicate all trees are proposed to be 100L container size (page 53). EES suggests this condition is included in the consent in case it is not be possible to obtain local provenance trees which are commercially available in a plant container pot size of 100 litres.	<b>The original recommended condition of consent is accepted.</b>
<b>5</b>	The Landscape Plan shall include details on:	The Landscape CC Plans shall include:		<b>The original recommended condition of consent is accepted, however, it should be amended to require the landscape plan to be revised prior to the issue of a construction certificate, to include:</b>
<b>5a</b>	the native vegetation community that occur or once occurred in this locality	<p>Proposed species relate to the surrounding Royal Randwick Racecourse site, not species based on the native vegetation community in the area.</p> <p><b>Delete condition.</b></p>	In response to the EES draft Condition 5(a) and (b), the RTS states it does not propose to use species based on the native vegetation community in the area and it requests 5 (a) and (b) are deleted (page 53). EES recommends that a condition is included which requires the Landscape Plan to use local provenance tree, shrub and	<b>The landscape plans should identify that the vegetation community that once occurred on this site was the Eastern Suburbs Banksia Scrub and indicate which species in the planting list are Eastern Suburbs Banksia Scrub species.</b>

	RECOMMENDED CONDITIONS OF CONSENT	SNA RESPONSE	EES RFI RESPONSE	SNA PROPOSED RFI RESPONSE
			groundcovers in the site landscaping.	
5b	a list of local provenance tree, shrub and groundcovers to be used in the landscaping	Native vegetation species are not proposed. As such, provenance stock is not required.  Delete condition.	See above	The landscape plans should be updated to incorporate the following local provenance trees, shrubs and groundcovers into the planting palette: <i>Actinotus minor</i> <i>Banksia integrifolia</i> <i>Darwinia fascicularis</i> <i>Dianella revoluta</i> <i>Hardenbergia violacea</i> <i>Hibbertia fasciculata</i> <i>Melaleuca squamea</i> <i>Pomax umbellata</i>
5c	the quantity and location of plantings	All details will be provided in detailed CC documentation package.  <b>Draft condition accepted.</b>	In relation to draft Condition 5(c)-(e), the RTS notes details will be provided in detailed Construction Certificate documentation. The Department needs to be satisfied with this approach.	Refer to comments for Condition 5.
5d	the pot size of the local native trees to be planted	All details will be provided in detailed CC documentation package.  <b>Draft condition accepted.</b>	See above	As above
5e	the area/space required to allow the planted trees to grow to maturity	All details will be provided in detailed CC documentation package.  <b>Draft condition accepted.</b>	See above	As above

	<b>RECOMMENDED CONDITIONS OF CONSENT</b>	<b>SNA RESPONSE</b>	<b>EES RFI RESPONSE</b>	<b>SNA PROPOSED RFI RESPONSE</b>
<b>5f</b>	Plant maintenance regime. The planted vegetation should be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species.		EES considers it is important that a condition is included in relation to the plant maintenance regime at the site as per EES's recommended draft condition 5(f).	<p>Noted. This will be included in the landscape specification prepared as part of the documentation package prepared prior to issue of a construction certificate.</p> <p><b>The original recommended condition of consent is accepted.</b></p>

## 4. OVERVIEW OF SUBMISSIONS RECEIVED

This 'Request for additional information' (RFI) addresses the submissions prepared by public agencies following the first Response to Submissions' Report (RtS) for the Winx Stand at Royal Randwick Racecourse, Randwick (SSD 10285). The additional submissions were received from the following:

- Randwick City Council (RCC)
- Environment, Energy and Science (EES)
- Sydney Water

A response to issues raised by DPIE and all other government agencies is provided in Section 4.3.

### 4.1. PUBLIC SUBMISSIONS



No public submissions were received.

## 4.2. SUMMARY OF SUBMISSIONS

Table 6 provides a summary of all submissions received and provides a respective response.

Table 3 Summary of submissions

Issue	Referral Comment	RFI response/ action
<u>Urban Design</u>	Council notes the revised Architecture Plans and Alternative Design Review prepared by Cox Architects which has resulted in revised built form massing, particularly to the Level 1 design and roof plan. Council is supportive of built form measures that will reduce negative noise impacts on the residential area to the south and south-west of the Racecourse site. Further comment on the revised Noise and Vibration Impact Assessment prepared as a result of the significant revisions to the built form massing are provided overleaf. The following comments are provided in relation to the Response to Submissions revisions to address urban design concerns raised in Council's submission on the EIS:	Noted. No further action required.
	<p><b>DISABILITY DISCRIMINATION ACT 1992</b></p> <p>The Revised Landscape Plans (Appendix C) incorporate a ODA ramp between the Winx Stand and the trackside lawn. Drawing No. DA-1918-02 Issue E indicates that a ramp has been provided with the following notation</p> <p>9. <i>2m wide asphalt path to trackside lawn area (1:26 grade over 16m). Adjacent lawn to match grade of path.</i></p> <p>No reference is made of ODA compliance in the drawing although it is noted that the grade is 1:26 over 16m. It is recommended that a sectional drawing be provided of the ramp with appropriate notation indicating ODA compliance. Furthermore, the revised plans should incorporate an appropriate flat landing/manoeuvring area at the lower end/base of the ramp for the convenience of users.</p>	It is acknowledged that the access to the trackside is via a graded walkway that is DDA compliant. A sectional drawing for the graded walkway is included in drawing SSDA-201-D.
	<p><b>BACK OF HOUSE FACILITIES</b></p> <p>In response to Council's earlier concerns regarding the visual impact of the back-of-house activities on the public domain, the Response to Submissions Report (Table 7, page 24) advises that:</p> <p><i>The back of house facilities are fully incorporated into the facility and are separated from general admission areas. The Winx Stand is fully located within the Spectator Precinct of Royal Randwick Racecourse and are not visible from the public domain</i></p>	Noted. The revised plans prepared by Cox Architects has been amended with an additional tree as requested. This can be seen SSDA-201-D and SSDA-301-C, in picture 11 on page 10 of this report and extracted below.

Issue	Referral Comment	RFI response/ action
	<p>Based on this advice, the Revised Architectural Plans indicates no additional screening measures in the laneway adjacent to the back-of-house area. It is recommend that to soften and screen the visual impact of this back of house area, including the loading dock, an additional tree should be provided on the south-western side of the stairwell adjacent to the sub-station at Grid DD in drawings No. SSDA-201 Revision C (Ground Floor) and No. SSDA-301 Revision B (North Elevation (Laneway)). This is indicated in the following montage.</p>  <p>Picture 12 Revised design (laneway looking north)</p> <p>Add new tree</p>	
<p><u>Heritage</u></p>	<p>Council officers have reviewed the RtS report and revised Heritage Archaeology Assessment (HAA). It is considered that the summary of submissions table satisfactorily addresses heritage issues raised by Council in its submission on the EIS. Council notes that the revised HAA makes recommendations in relation to a Chance Find Procedure in the event of uncovering archaeological resources. In relation to this recommendation, the following amended condition should be included:</p> <p>In the event of uncovering any archaeological resources including relics, the following Chance Find Procedure must be implemented:</p> <ul style="list-style-type: none"> <li>• Stop work and demarcate affected area.</li> <li>• Contact a suitably qualified archaeologist or heritage consultant to provide advice and assess the finds.</li> <li>• Notify the Heritage Council of NSW under Section 146 of the NSW Heritage Act 1977 if the finds are assessed as relics under the NSW Heritage Act 1977.</li> <li>• Provide an appropriate archaeological management plan to manage the identified relics.</li> </ul>	<p>Noted. No further action required.</p>

Issue	Referral Comment	RFI response/ action
<u>Ecologically Sustainable Development (ESD)</u>	<ul style="list-style-type: none"> <li>Resume work only when the proposed management plan has been applied and written clearance is provided.</li> </ul> <p>Council is supportive of the incorporation of rooftop solar panels to enhance the energy efficiency and sustainability of the proposal. Furthermore, Council reiterates its position that as many of the recommended ESD considerations from the GHD Ecologically Sustainable Development report (Appendix Q of the EIS) should be incorporated into the project at this detailed designed stage. This will ensure the project reflects leading national and international best practice sustainable building practices to improve environmental performance. Council would strongly suggest that ATC consider the installation of electric vehicle recharging facilities, as suggested in the GHD ESD report on the Racecourse site, be it through this approval or at another stage. This would add to the growing Eastern Suburbs Public Electric Vehicle Charging Station Network established across Randwick, Waverley and Woollahra LGAs.</p>	<p><b>Noted.</b> The recommendation for electric vehicle charging stations on the racecourse is something that is being considered for the future. However, due to the proposed Winx Stand's location on the site and limited public vehicle access, it does not provide the best outcome as part of this development and at this point time.</p>
<u>Draft Pedestrian, Traffic and Transport Management Plan</u>	<p>A draft Pedestrian, Traffic and Transport Management Plan (PTTMP) has been prepared as part of the RtS which provides a holistic response to the Racecourse site, surrounding transport network and other surrounding key land uses. Council notes that the plan will remain in draft until further testing and consultation with stakeholders can take place; specifically, after the current COVID 19 restrictions have eased on places of mass congregation and social distancing. Council also notes that the ATC would like to work with Transport for NSW on a strategy that encourages patrons to use the Kensington light rail stop as it is within walking distance of the Randwick Racecourse Precinct. Council looks forward to continuing to collaborate with the ATC and other stakeholders in the finalisation of the PTTMP.</p>	<p>Noted. No further action required.</p>
<u>Environmental Health</u>	<p>Environmental Health Officers have reviewed the amended plans, revised Noise and Vibration Impact Assessment and Response to Submissions report. In response, the following comment is provided. Amended environmental health conditions have also been attached to this submission for consideration in the final assessment and conditioning of the SSD.</p>	<p>Noted. No further action required.</p>
	<p>Acoustic amenity</p> <p>GHD has prepared a revised Noise and Vibration Impact Assessment (NVIA) dated March 2020 for the proposed development. Mitigation measures for both construction and operational activities are detailed in Section 7 and should be implemented to achieve relevant noise</p>	<p>Noted. Section 6.3.4 of the Noise and Vibration Impact Assessment (NVIA) provides noise modelling for the existing operations of the QEII function area and is a</p>



Issue	Referral Comment	RFI response/ action
	<p>emission criteria. Based on the noise modelling assumptions and assessment of the operation of the proposed Leger Lawn Redevelopment, the development is predicted to comply with the relevant noise emission criteria presented in Section 3. With the mitigation measures presented in Section 7 implemented, the proposal should not adversely affect the acoustic amenity of the surrounding residential area.</p> <p>The cumulative impact of the proposal operating in conjunction with the rest of the site must be considered. Criteria from OLGR should apply to the proposal in relation to Liquor Licence compliance or otherwise dictated by OLGR requirements or the Department of Planning, Industry and Environment. It is not recommended any approval for events past midnight on any day is given.</p> <p>The noise emission from the site is proposed to be managed under the existing Noise Management Plan for the spectator precinct. An Operational Management Plan prepared by the Australian Turf Club - Royal Randwick Racecourse dated 2019 has been provided with the application. The potential for noise nuisance has been considered and appropriate conditions have been attached to this submission.</p>	<p>conservative assessment that is considered relevant to the proposed Winx Stand.</p> <p>The proposal for events past midnight is considered reasonable and can be suitably controlled to minimise acoustic impacts on surrounding land uses, as addressed in the original Mitigation Measures on page 81 of the EIS and updated on page 21 of the RTS report.</p> <p><b>The operation of events up to 2am is consistent with existing operations on the racecourse as approved under MP10_0097 MOD 2 and is important to the viable operation of the facility into the future as a function space.</b></p> <p><b>Please refer to the RTS report for comments on the recommended conditions of consent.</b></p>
	<p>Land contamination</p> <p>A Detailed Site Investigation prepared by Douglas Partners dated October 2019 states that based on the results of the investigation, it is considered that remediation (and a Remediation Action Plan) is not required for the proposed development. Given the variable fill at the site, an Unexpected Finds Protocol (UFP) should be prepared for site development. The UFP would detail the requirements and procedures for encountering contamination, or signs of contamination, during excavation works. Soils requiring off-site disposal will need to be given a waste classification in accordance with NSW EPA Waste Classification Guidelines 2014 and disposed of accordingly. Concentrations of contaminants in groundwater are considered to not pose a risk to human health or ecological receptors or site or down gradient of the site for the proposed development.</p>	<p><b>Noted. Preparation of an UFP prior to works occurring to be included as a condition of consent.</b></p>
	<p>Food safety</p>	<p>Noted. Food safety conditions to be included as condition of consent.</p>

Issue	Referral Comment	RFI response/ action
	<p>Appropriate conditions in relation to food safety have been attached to ensure compliance with relevant legislation.</p> <p><i>Refer to Appendix A for Environmental Health revised conditions of consent</i></p>	
<u>Landscaping</u>	<p>The EES submission of 27 November 2019 on the EIS advised the Indicative Planting Schedule incorporates an invasive exotic species (Indian Hawthorn - <i>Raphiolepis indica</i>) and exotic species, such as:</p> <ul style="list-style-type: none"> <li>• Red Hot Poker - <i>Kniphofia uvaria</i> 'Flamenco'</li> <li>• Japanese Box – <i>Buxus japonica</i></li> <li>• 'Magnifica' Gardenia - <i>Gardenia augusta</i></li> </ul> <p>The Summary of Submissions in the RTS (Table 7) does not specifically provide a response to the EES comments in relation to the proposed use of these plant species, instead it refers to item 8 in Table 7 (see pages 35-36 of RTS) which is a response to Randwick City Council's submission. The indicative planting schedule in the Revised Landscape Plan and the amended indicative planting schedule in the RTS still propose to use Indian Hawthorn (Figure 4, see page 8 of RTS). As the fruit of Indian Hawthorn is easily dispersed by birds and Indian Hawthorn is a problem in remnant bushland in the Sydney region, EES recommended it not be used in the Landscape Plan, especially as the site is near Centennial Park which contains Eastern Suburbs Banksia Scrub which is critically endangered. EES repeats this recommendation.</p>	<b>Noted. Refer to Section 3.2 of this report for a detailed response.</b>
	EES notes the Revised Landscape Plan has removed Red Hot Poker from the plant species list but exotic species such as Japanese Box and 'Magnifica' Gardenia are still proposed to be used. It is noted however that <i>Buxus</i> sp. are to be used on level 1 of the Winx Stand as a formal hedge and the RTS states it is not invasive (page 52 of RTS). The EES submission did not state that Japanese Box was invasive but rather that it is an exotic species (i.e. non-native). Where landscaping is proposed at ground level it is recommended local native provenance plants are used.	As above.
	EES previously noted the proposed use of non-local native species such as the Firewheel tree ( <i>Stenocarpus sinuatus</i> ) and recommended the landscaping at the site uses a diversity of native trees, shrubs and groundcover species from the relevant local native vegetation communities (local provenance material) that once occurred in this locality (rather than use exotic species	As above.

Issue	Referral Comment	RFI response/ action
	<p>and non- locally occurring native species). The RTS states <i>“it is proposed the Queensland Firewheel Trees are changed to Banksia integrifolia floribunda ‘Sweeper’</i> (see Table 7, page 27) but the indicative planting schedule in the Revised Landscape Plan and the amended indicative planting schedule in the RTS do not reflect this, as they still propose to use Firewheel Trees (Figure 4, page 8 in RTS). It is recommended the Department clarifies with the proponent whether it is proposed to remove the Firewheel tree from the planting schedule.</p>	
<u>Urban Tree Canopy</u>	<p>The EES submission recommended the development replaces any removed trees at a ratio greater than 1:1 to mitigate the urban heat island effect. The RTS confirms that <i>“no trees are proposed to be removed and that the three (3) Magnolia Little Gems are to be relocated and five (5) new canopy trees are proposed to be planted”</i> (page 28). EES recommends the new canopy trees to be planted are local provenance native species.</p>	<p>As above.</p>
<u>Recommended conditions of consent</u>	<p>The EES submission on the EIS recommended the following conditions (1-5) are included if the SSD is approved:</p> <p>1     <i>Invasive exotic species are removed from the Landscape Plan and replaced by a diversity of local native provenance trees, shrubs and groundcover species (rather than exotic species or non-local native species) from the relevant native vegetation community which once occurred in this locality.</i></p> <p>The RTS notes the Landscape plans prepared by SNA have been amended to remove invasive exotic species from the plant list (Table 8, page 52) but according to the indicative planting schedule in the revised Landscape Plan and the amended indicative planting schedule in the RTS, the proponent still proposes to use Indian Hawthorn (Figure 4, page 8 of RTS). EES repeats its recommendation that invasive exotic species are removed from the Landscape Plan.</p> <p>The RTS states the use of native vegetation that once occurred on the site (Eastern Suburbs Banksia Scrub) would be out of place on this highly trafficked and maintained site (page 52). EES notes the Development Consent (dated 29 November 2019) for the Qantas Flight Training Centre which is located at 297 King Street Mascot (SSD-10154) includes a condition (B45(a)) which requires the species to be planted on-site “to include a diversity of local provenance</p>	<p>As above.</p>

Issue	Referral Comment	RFI response/ action
	<p>plant species from the Eastern Suburbs Banksia Scrub in the Sydney Bioregion". If SSD-10154 can use local provenance species it is unclear why the landscaping plan for the Royal Randwick Racecourse can't also use a diversity of local native provenance species from the Eastern Suburbs Banksia Scrub. EES recommends its draft condition (1) as above is included in the development consent.</p>	
	<p>2 <i>Trees removed, shall be replaced at a ratio greater than 1:1</i></p> <p>Table 8 in the RTS confirms that the existing exotic 3 trees are not to be removed and that 5 trees will be planted (page 53). EES recommends the planted trees are local provenance native species.</p>	As above.
	<p>3 <i>Enough area/space is provided on site to allow the trees to grow to maturity</i></p> <p>The RTS requests that this draft condition is deleted as it is a duplicate condition as per item 5(e) below (page 53). EES agrees to this.</p>	As above.
	<p>4 <i>Tree planting at the site shall use advanced and established trees with a minimum plant container pot size of 75-100 litres, or greater for local native tree species which are commercially available. Other local native tree species which are not commercially available may be sourced as juvenile sized trees or pre-grown from provenance seed</i></p> <p>The RTS notes this condition is unnecessary and requests it is deleted as the landscape plans indicate all trees are proposed to be 100L container size (page 53). EES suggests this condition is included in the consent in case it is not be possible to obtain local provenance trees which are commercially available in a plant container pot size of 100 litres.</p>	As above.
	<p>5 <i>The Landscape Plan shall include details on:</i></p> <p>a) <i>the native vegetation community that occur or once occurred in this locality</i></p> <p>b) <i>a list of local provenance tree, shrub and groundcovers to be used in the landscaping</i></p> <p>c) <i>the quantity and location of plantings</i></p>	As above.

Issue	Referral Comment	RFI response/ action
	<p>d) <i>the pot size of the local native trees to be planted</i></p> <p>e) <i>the area/space required to allow the planted trees to grow to maturity</i></p> <p>f) <i>plant maintenance regime. The planted vegetation should be regularly maintained and watered for 12 months following planting. Should any plant loss occur during the maintenance period the plants should be replaced by the same plant species.</i></p> <p>In response to the EES draft Condition 5(a) and (b), the RTS states it does not propose to use species based on the native vegetation community in the area and it requests 5 (a) and (b) are deleted (page 53). EES recommends that a condition is included which requires the Landscape Plan to use local provenance tree, shrub and groundcovers in the site landscaping.</p> <p>In relation to draft Condition 5(c)-(e), the RTS notes details will be provided in detailed Construction Certificate documentation. The Department needs to be satisfied with this approach.</p> <p>EES considers it is important that a condition is included in relation to the plant maintenance regime at the site as per EES's recommended draft condition 5(f).</p>	
	<p>Thank you for notifying Sydney Water of SSD-10285 on the Leger Lawn at the Royal Randwick Racecourse, which proposes a 5,043m<sup>2</sup> GFA 2-storey structure, to be known as the Winx Stand. Sydney Water has reviewed the application based on the information supplied and provides the following comments to assist in planning the servicing needs of the proposed development.</p>	<p>Noted.</p>
<p><u>Water Servicing</u></p>	<ul style="list-style-type: none"> <li>• Potable water servicing should be available to serve the development. Amplifications, adjustments, and/or minor extensions may be necessary.</li> <li>• The proponent is advised to supply an estimate of the fixture units within the stand and any proposed changes to the current connection/s for the site.</li> </ul>	<p><b>Water servicing is being considered as part of a separate Section 73 application to Sydney Water.</b></p> <p>Additional information is provided in Appendix B, which demonstrates that the site can be adequately serviced with potable water without requirement for</p>

Issue	Referral Comment	RFI response/ action
<u>Wastewater Servicing</u>	<ul style="list-style-type: none"> <li>Wastewater servicing should be available to serve the development. Amplifications, adjustments, and/or minor extensions may be necessary.</li> <li>As noted in the EIS the proposed stand is to be constructed over the existing DN225 sewer located within the site.</li> <li>The EIS suggests that deviating the main is the only option. No discussion of the future status of the deviated main was included. It may serve the needs of both Sydney Water and the Trust if the affected sections and any upstream sections of main came under the ownership of the Trust.</li> <li>The detail of the proposed changes to the DN225 sewer must be included in the Section 73 application.</li> </ul>	<p>amplification or adjustments to existing infrastructure.</p> <p><b>Wastewater servicing is being considered as part of a separate Section 73 application to Sydney Water. This includes the application for the deviation of an existing wastewater main that traverses the northern edge of the proposal. A technical consultant on behalf of the ATC has consulted with Sydney Water as part of the application process for these works.</b></p> <p>Additional information is provided in Appendix B, which demonstrates that the site can be adequately serviced with potable water without requirement for amplification or adjustments to existing infrastructure.</p>
<u>Stormwater</u>	<ul style="list-style-type: none"> <li>Requirements for Sydney Water's stormwater assets (for certain types of development) may apply to this site. The proponent should ensure that satisfactory steps/measures are taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets.</li> <li>The proponent should consider taking measures to minimise or eliminate potential flooding and/or degradation of water quality, should avoid adverse impacts on any heritage items, and should create pipeline easements where required.</li> </ul>	Noted.
	This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.	Noted.

Issue	Referral Comment	RFI response/ action
<b>Government Architect NSW</b>		
<u>General Advice</u>	<p>The Government Architect NSW has been asked to provide independent design review commentary on State Significant Development application SSD 10285. I have reviewed the submission for this project. The applicant has addressed comments provided during the EIS and we have no further comments on this application.</p> <p>We recommend that a condition relating to the installation and commissioning of the solar panels prior to occupancy of the building be included.</p>	<p>Noted.</p> <p>Following the GANSWs comments in the RFI, proposed changes to the southern and western façade have been prepared in consultation with GANSW.</p> <p>The revised design is considered to provide a high quality, attractive and functional outcome for the back-of-house area.</p>



## 5. CONCLUSION

This response to the RFI has considered the submissions received from RCC, EES and Sydney Water received in relation to SSD 10285 for the new Winx Stand at Royal Randwick Racecourse. The proposal has been revised through a further detailed design review process to simplify the construction method and provide a more efficient and affordable outcome in response to the current economic climate. The proposed changes to the design have been undertaken in consultation with GANSW and are considered to provide an attractive, more functional and positive outcome that compliments the aesthetic of the Winx Stand. The EIS and RtS confirmed that there are no significant adverse environmental impacts and the proposal should be approved subject to suitable conditions of consent.

The proposal is considered suitable for the site and worthy of support by the Minister (or his delegates) for the following reasons:

- It will assist in delivering a new and much needed all-weather facility that will significantly enhance the amenity of general admission patrons on race day events and for visitors to non-race day events. The proposed patronage will remain consistent with the capacity approved under MP10\_0097 MOD 2.
- The new facility will further elevate Royal Randwick Racecourse as NSW's primary racing venue and its capacity to contribute to the local and state economy.
- The land is zoned 'RE1 – Public Recreation'. The proposed development is permissible with consent and consistent with the land use objectives of RE1 zoning.
- It is consistent with the objectives of all relevant planning controls and achieves a high level of planning policy compliance.
- Subject to the various mitigation measures recommended by the specialist consultants, the proposal does not have any unacceptable impacts on adjoining properties, the public domain or end users in terms of traffic, heritage, social and environmental impacts.
- The applicant has taken into consideration the submissions received from State agencies and council, particularly regarding pedestrian and traffic management; landscaping; and built form. Detailed analysis of these issues has been undertaken, with design modifications proposed to mitigate impacts, where practical and possible.
- The site is well serviced by public transport and various walking and cycling routes. The proposal is not expected to exacerbate the existing traffic flow conditions and a draft PTTMP has been prepared in consultation with key stakeholders, including TfNSW, NSW Police and RCC.
- This project is fully funded and 'shovel ready' for commencement of construction as soon as possible this year to take the opportunity for construction whilst large scale events are currently restricted in these challenging times. It will deliver genuine economic benefits in these challenging times, particularly in creating over 150 full-time jobs during construction, and will sustain many direct and indirect jobs during its operation once the current COVID related restrictions are lifted.

In summary, this response to the RFI has addressed all outstanding matters raised in submissions and will result in a great new facility that the public will be able to enjoy in the future. Therefore, this proposal warrants being fast-tracked for approval, subject to conditions.

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

## **APPENDIX A**

## **REVISED ARCHITECTURE PLANS**

## **APPENDIX B**

## **ADDITIONAL SYDNEY WATER INFORMATION**

