

Our Ref: F2012/00089

Contact Officers: Joanna Hole and Scott Williamson

7 September 2012

Director General
NSW Department of Planning and Infrastructure
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Ms Caroline Owen

Dear Madam,

**PLANNING PROPSOAL: ROYAL RANDWICK RACECOURSE
REF: (PP_2012_RANDW_001_00); &**

**STATE SIGNIFICANT DEVELOPMENT APPLICATION: ROYAL RANDWICK
HOTEL REF: (SSD 5002-2011)**

I refer to the abovementioned proposals being concurrently assessed by the Department of Planning and Infrastructure and regarding the Randwick Racecourse.

Council appreciates the opportunity to review the proposals, and provides comment in relation to:

- o The proposed Randwick LEP 1998 (Consolidation) amendment, seeking to permit additional hotel/ motel, serviced apartment, conference and bar/restaurant uses to Schedule 2, within the 'spectator precinct' of the Royal Randwick Racecourse (RRR);
- o The concurrent State Significant Development Application for an eight storey hotel facility comprising 170 rooms, ancillary restaurant, bar, conference facilities and basement parking.

It is noted that the proposal has the potential to deliver social and economic benefits to the community, utilising the established Randwick Racecourse facility, and supporting the wider concentration of event-based, recreational and cultural destinations.

The proposal also provides strong synergies with the joint planning and advocacy for light rail from Central Sydney to Randwick being promoted by Council, the Australian Turf Club and the University of NSW, and under investigation by the State Government.

Notwithstanding this, it cannot be ignored the Racecourse precinct is located within a sensitive, highly residential context. Moreover, the site is an important gateway to Randwick. It is imperative the proposal responds appropriately to this context, mitigating potential detrimental impacts both in terms of built form and the significant intensification of the operation in this location.

While considering the primary use proposed for motel/serviced apartment accommodation is suitable in principle, Council is of the firm view the proposed built form requires significant refinement to provide a better interface with the adjoining public spaces and heritage elements. Detailed comments below are provided on specific aspects of the Planning Proposal and State Significant Development Application.

THE PLANNING PROPOSAL

The Planning Proposal seeks to amend Schedule 2: "Development of land for certain additional purposes", of the Randwick Local Environmental Plan 1998 – Consolidation (RLEP), to include additional permitted uses on the Royal Randwick Racecourse site.

The following additional uses are proposed:

- Motel - means a building providing short-term accommodation for travellers and tourists, but (in Part 2) does not include a building elsewhere defined in this clause (Clause 49 of Part 5 of RLEP).
- Serviced apartment - means a dwelling which is cleaned and otherwise serviced or maintained by the owner or manager of the building or the owner's or manager's agent, and which provides temporary accommodation for people whose principal place of residence is elsewhere.
- Hotel - means a building or place specified in a hotelier's licence granted under the *Liquor Act 1982*.
- Restaurant - means a building or place used for the provision of food or drink (or both), whether or not for consumption on the premises or for takeaway.
- Function centre - means a building or place used for the holding of events, functions, conferences and the like, and includes convention centres, exhibition centres and reception centres, but does not include an entertainment facility.

General comments

The motel and serviced apartment uses proposed are generally consistent with the broader strategic context for the Eastern Subregion and Randwick Education and Health Specialised Centre, and provide potential to support the continuing viability of the Racecourse and its core functions of horse racing and training.

The proposed location within the Racecourse Spectator Precinct is considered suitable, in that it will maintain the concentration of public and event-based activities in one part of the Racecourse, and can positively contribute to the wider cluster of recreation, leisure and sporting destinations, including Centennial Parklands, the Sydney Cricket Ground and Football Stadium.

The hotel, motel and serviced apartment uses proposed to be added to Schedule 2 of RLEP are supported. This is on the basis that these uses are confined to a single building/facility only, and located in the Spectator Precinct as outlined in Appendix 5 of the Department of Planning and Infrastructure's (DP&I) Planning Proposal.

It is important that the development itself is related to the use and enjoyment of the Racecourse as a regionally significant open space asset, and its core event-based activities and the functions of horse racing and training. Council would not support hotel (ie: bar) activities as the primary use of the development.

It is recommended that an up to date master plan (suggested in the form of an update to the Racecourse DCP) is prepared for the site consistent with CI40A of the RLEP, to allow a more holistic understanding and consideration of the cumulative impacts of this and future development proposals for the Racecourse.

Concern remains with several aspects of the design, including visual impact, relationship with the streetscape and public domain, heritage context, pedestrian amenity and safety, and amenity impacts on surrounding areas. The comments of the DP&I internal urban design review are noted and its recommendations for design amendments to be reflected in revised Development Application drawings are supported. Further details are included under the comments on the SSD application.

Randwick Local Environmental Plan 1998 - Consolidation (RLEP)

The following comments on the Planning Proposal are provided in relation to the relevant aspects of RLEP:

Permissible Uses

It is noted that a restaurant is already permissible with consent in the 6A-Open Space zone in RLEP, and a restaurant or café is permissible with consent in the RE1 – Public Recreation zone in the draft LEP. Therefore the Planning Proposal may not need to make reference to these uses.

Function centre activities are generally considered suitable for the Spectator Precinct, and align with its existing event-based nature. In the technical drafting of any amendment to RLEP, care should be taken to ensure that inclusion of function centres as a new use does not inadvertently affect its permissibility in other zones, where they may be currently permissible under the broader term of business premises.

6A-Open Space: Objectives of the zone (RLEP)

The additional permissible uses of motel, hotel and service apartments in the Planning Proposal are considered generally consistent with the objectives of the 6A-Open Space zone, listed below. This is conditional upon any development proposed being directly related to the core functions of the Racecourse, and enhancing the Racecourse as a regionally significant open space asset.

- *To identify publicly owned land used or capable of being used for public recreational purposes.*
- *To allow development that promotes, or is related to, the use and enjoyment of open space.*
- *To identify and protect land intended to be acquired for public open space.*
- *To identify and protect natural features that contributes to the character of the land.*
- *To enable the sustainable management of the land.*

Development in open space zones

Any development on the Racecourse must address Clause 38(1) of RLEP, which requires the consent authority to consider:

- a) *the need for the proposed development on that land, and*
- b) *whether the proposed development promotes or is related to the use and enjoyment of open space, and*
- c) *the impact of the proposed development on the existing or likely future use and character of the land, and*
- d) *the need to retain the land for its existing or likely future use.*

It is important that the proposed activities are related to the role and function of the Racecourse. The use of the proposed development as a hotel (ie: bar) as its primary purpose would not be considered consistent with the above clause, and may be unsuitable for a site in out-of-centre location, which is not surrounded by other active uses, and provides poor opportunities for passive surveillance. After dark in particular, the area is not heavily used, and is not located on pedestrian desire lines that connect to other destinations/locations.

In the technical drafting of any amendment to RLEP, it is recommended that it reflects the intention that the development proposed on the subject site is for the primary use of a motel and serviced apartments.

The design, scale and visual impact of the proposal as outlined in the SSD application is considered to have a poor impact on the character of the Racecourse site and surrounding context. These issues are further discussed in the detailed comments on the SSD application (EIS).

Site Specific Development Control Plans

Clause 40A of RLEP requires the consent authority to consider development applications for sites over 10,000 sqm in area in the context of a site specific Development Control Plan (DCP), prepared for the development of the land. The existing Royal Randwick Racecourse DCP (2007) does not identify a hotel, motel/serviced apartments or function centre for the site, but does note the need for diversification of event-based activities to support the future viability of racing operations on the site.

It is considered preferable for the Planning Proposal and SSD application to be assessed in the context of an up to date overall master plan for the Racecourse, which would allow a fuller understanding of the relationship of this proposal with the existing and future proposed development on this part of the site.

The EIS includes a summary of the ATC's vision for Randwick Racecourse in Sections 1.2 and 1.3, and refers to a broad concept plan. It is noted however, that the concept plan or vision has not been formally presented to the Council or community for consideration or endorsement, and contains some inconsistencies with the DCP.

The Planning Proposal notes that the hotel development is part of a holistic redevelopment of the Racecourse site, but the potential cumulative impacts of developments over time on the Racecourse are not able to be understood or considered as part of the assessment of the hotel SSD application.

While it is understood that DCPs do not apply to State Significant Development identified in the State and Regional Development SEPP (SRD SEPP), the Racecourse DCP was recommended as a relevant policy by Council, and has been listed in the Director General's Requirements for the SSD Application. An updated site specific DCP is suggested as a suitable document to formally articulate the broader long term vision for the Racecourse.

Draft Randwick Comprehensive LEP (draft LEP)

The following additional comments are made in relation to the draft Randwick Comprehensive LEP (draft LEP), currently with the Department of Planning for finalisation and future gazettal.

These comments are in response to specific additional uses proposed in the ATC's Planning Proposal to be included in the draft LEP, when gazetted. The additional uses proposed in Schedule 1 of the draft LEP are proposed to include "food and drink premises", "tourist and visitor accommodation" and "function centres".

The definition of food and drink premises in the draft LEP is an umbrella term that includes restaurants and cafes, and pubs as permissible uses. Similarly, tourist and visitor accommodation is an umbrella term that permits backpackers accommodation, in addition to serviced apartments and hotels.

These broader definitions are not supported, and it is suggested that the appropriate Standard Instrument definitions consistent with the additional uses proposed in RLEP are;

- hotel or motel accommodation
- serviced apartment
- restaurant or café
- function centre

Under the Standard Instrument, the definitions of hotel or motel accommodation, and restaurant or café both allow for service of liquor, and therefore the inclusion of "pub" as a specific permissible use is considered neither necessary nor suitable.

The EIS notes the development application is for a hotel with ancillary conference, restaurant and bar facilities. Therefore any sale or service of liquor should only occur as an ancillary component of the operation of the proposed hotel or restaurant use.

Comments on the justification provided in the Planning Proposal

Comments are made below against certain aspects of the justification, based on the key criteria defined in the Department of Planning and Infrastructure's *Guide to Planning Proposals*.

In general the Proposal is considered to meet the justification criteria relating to its consistency with the broader strategic context, and, provided the highlighted issues are addressed, is able to provide a net community benefit. Concerns remain, however, in relation to the Proposal's design and visual impact, its compatibility with the context, and amenity impacts. These are summarised below, and in addressed further detail in the comments on the EIS.

Will the LEP be compatible/ complementary with surrounding adjoining land uses?

The proposal's immediate context within the Spectator Precinct is considered suitable, however the location is also close to established residential areas and Kensington Town centre to the west, and a recognised neighbourhood centre to the north east. Care should be taken in the design, construction and operation of any development in order to create a positive, complementary relationship with these established areas.

This includes ensuring appropriate measures are in place to avoid adverse effects on surrounding neighbourhoods, especially after dark, such as potential noise,

lighting and social amenity impacts associated with hotel, restaurant and function centre operations.

As noted previously, this also includes ensuring that any food and beverage uses are related and ancillary to the hotel operation, rather than the primary use of the building, as this is an out of centre location opposite a park, and not well situated to provide passive surveillance of night time activity.

What is the impact on the amenity in the location and wider community? Will the public domain improve?

The proposed development appears to orient itself towards the Racecourse rather than Alison Road, with back-of-house uses, services and landscaping at podium level facing Alison Road. While the aim to place the hotel within the Racecourse's landscaped setting is acknowledged, the development effectively turns its back on the public domain, creating a blank façade at street level with poor pedestrian amenity. A revised approach to site strategy, built form and streetscape interface are considered essential and are reiterated in the comments provided below in relation to the concurrent Hotel SSD application.

Other amenity impacts include concerns relating to the proposal's visual impact, including potential safety and amenity issues with reflectivity and glare generated by the facade fronting Alison Road, and design issues including disproportionate scale relationships, bulk, articulation and materials and details. These are also addressed in detail in the comments on the SSD application.

Although it is noted that State Significant Development proposals are not subject to review by a Design Review Panel, this is a major project in a highly prominent and culturally significant location. The advice from DP&I's internal urban design unit is noted, and the recommendations for design improvements to be incorporated into revised development application drawings is supported.

Are there any other likely environmental effects and how are they proposed to be managed?

The Racecourse site and the location of the proposed development contain highly significant heritage values. The Racecourse itself is identified as a Heritage Conservation Area in RLEP (and draft LEP), and there are 2 items of high or exceptional heritage significance in close proximity to the proposed hotel site.

Additionally the site lies adjacent to the state significant Centennial Parklands, and the North Randwick Heritage Conservation Area. The development proposal is not considered to positively address the heritage context of the overall and immediate site.

While the proposal suggests consultation with the state government Heritage office is not necessary, it is recommended that comments are sought and provided from the Heritage Branch of the Office of Environment and Heritage, and that any recommendations are taken into account prior to finalising the design.

How has the proposal adequately addressed any social and economic effects?

In principle the proposed hotel (accommodation) use related to and supporting the Racecourse functions is supported. While not specifically the subject of the current Planning Proposal and SDD application, the EIS alludes to the vision of the ATC for the Racecourse to include "a retail offering to complement the Kensington retail village". It is considered that standalone retail or commercial uses in the Spectator Precinct are not consistent with the core event-based nature of this Precinct, nor with the surrounding context.

Potential social impacts of the proposed restaurant and bar uses should be managed to ensure it does not operate in such a way as to create adverse impacts on public safety and enjoyment of the locality. Further comments are included in the SSD application on this issue.

What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway determination?

The Planning Proposal and SSD application appear essentially the same as a preliminary proposal discussed with Council officers prior to formal lodgement of the Planning Proposal.

At that time preliminary feedback from the Council indicated that the proposal for one hotel (for accommodation) in the location proposed within the Spectator Precinct could be potentially suitable, but that the proposal would need to satisfy Council and the community that it will enhance the use of the Racecourse site for its primary purposes of racing and training, and will not detract from surrounding uses, in particular nearby commercial and residential areas.

While noting the potential suitability of the use, Council officers expressed concerns about the scale, design and visual impact of the proposed hotel, and suggested that a best practice independent design review should be undertaken to inform the design development.

The design appears unchanged since these earlier discussions, however the review by DP&I's urban design unit is noted, and its recommendation for revised development application drawings to be provided addressing design concerns is supported.

Is there adequate public infrastructure?

The proposed development and its intensification of use of the Spectator Precinct impacts on the available traffic and services infrastructure. The material provided in the SSD application in this regard does not provide sufficient detail or otherwise adequately address the infrastructure requirements for the development. This is further addressed in comments provided in the SSD application.

Conditions of Gateway Determination

The Gateway Determination of 18 July 2012 was issued subject to the following matters being addressed for the purposes of public exhibition:

- Heritage
- Traffic and access
- Visual impact
- Stormwater management

It is understood from discussions with the Australian Turf Club that the above issues are intended to be addressed through the documentation provided as part of the SSD application. Therefore, the detailed comments and recommendations provided below on these issues in relation to the SSD application's EIS are also relevant to consideration of the Planning Proposal. It is not considered that the EIS has satisfactorily addressed all of the above matters, and that revised development application drawings and documentation should be provided to address the recommendations prior to determination.

STATE SIGNIFICANT DEVELOPMENT APPLICATION SSD 5002-2011;

Further to the above comments regarding the Planning Proposal for the subject site, Council provides its comments in relation to the State Significant Development Application being concurrently exhibited for a 170 room, 8 storey hotel with ancillary restaurant, bar, conference facilities and basement parking at the Racecourse.

Council acknowledges the project has the potential to deliver social and economic benefits to the community, utilising the established Randwick Racecourse facility.

Importance of the site

Notwithstanding the potential suitability the event-based nature of the Spectator Precinct provides, it cannot be ignored the site is of immense significance to the Randwick area and is sited within a sensitive context. Notably, the site exists within;

- A highly prominent gateway location to the Randwick Local Government Area and the greater Eastern suburbs;
- An important and highly trafficked transport corridor of Alison Road and Darley Street;
- An established residential setting of the greater racecourse site, with residential sites as close as 70 metres from the proposal;
- An influential location with regard to the heritage significance of;
 - Adjoining heritage items of the Members Stand and Turnstile Building;
 - The Racecourse Precinct Conservation Area;
 - The adjoining North Randwick Conservation Area;
 - The state significant Centennial Parklands.

It is imperative the current application responds sympathetically to this context, mitigating detrimental impacts both in terms of built form and the operational intensification proposed in this location. The following key issues are raised by Council in relation to the proposed hotel.

Built form

It is imperative the highly prominent nature of the site inform any subsequent site strategy, built form and finer grained building detail. The degree to which this appears to have been overlooked within the current scheme is of issue to Council.

◦ Site strategy and building envelope;

The applicant complements the design of the proposal with the label of a landmark building. Despite this, the site strategy gives design preference to addressing the internal interests of the racecourse rather than defining the public spaces external to the site.

Council would reiterate the site is not only highly prominent, but importantly provides frontage to the Racecourse Precinct Conservation Area, the Heritage Members Stand and Turnstile, Centennial Park and adjoins the North Randwick Conservation Area.

The hotel component is elevated such that the bulk of the structure presents an intimidating mass above the street. The mass is oddly placed; aligned such that a

single, 33 metre high corner of the building abuts the streetscape. The imposing nature is reiterated by a setback of roughly two metres to Alison Road.

At pedestrian level, this proposed siting and form of eight stories of building bulk will introduce an effect to the Alison Road streetscape rivalled only by a density of built form associated with a town centre. This impact will prove entirely incompatible with the open space character of the locality. While the design attempts to relieve bulk to lower podium levels through the columned design, the mass and minimal setback above the street introduce an effect comparable to an overpass to the pedestrian realm on Alison Road. The underside of the hotel component will be highly visible, while the proposed surface treatment to be applied is unclear.

The significant building bulk, height and depth of elevation integrated with a minimal setback to the street, all serve to emphasise a monumentalist design rationale. The resulting built form introduces an element that is incongruous with surrounding development and obtrusive to important and highly trafficked public spaces. The envelope provides negligible response of form or material in the context of the immediately adjoining heritage components, including the Members Stand or remaining Turnstile Building. With the top heavy appearance proposed, the building would loom menacingly over these heritage buildings. While the southern elevation provides improved interest through fenestration, the curve of the racetrack is not celebrated within the architectural response.

The height of the development is argued to be modelled on larger elements in the locality, including that of the Randwick TAFE building and the racecourse's QE2 Stand. These buildings are not representative of the general scale and character of development in the locality, and are not considered of sufficient design quality or relevance in terms of their siting or function to the proposed hotel development to warrant emulation.

Parts 3 and 9 of the Director General's Requirements provide that the scheme inform appropriate gateways, massing, setbacks and treatment of heritage significance within design. The extent to which the scheme achieves these intentions as they relate to the gateway of Alison Road, the State Heritage Centennial Parklands and adjoining Conservation Areas, is not supported.

Recommendation:

The Department of Planning and Infrastructure is strongly urged to pursue large scale design amendments with the applicant. A formal review of the design should be undertaken by an independent expert, such as the Government Architect, prior to determination.

Any high quality streetscape outcome would involve substantial redistribution of the hotel building mass, stepping down the built form toward the street and substantial increase to the proposed setback. A form that celebrates the curved alignment of the racetrack would better add to the sense of place and those buildings existing within the spectator precinct and Racecourse Precinct Conservation Area.

These coupled with articulating elements and improved material use to break up the horizontality of the building and flat façade to Alison Road, would amount to a significantly improved response to site context.

o Internal layout

Internally, the podium configuration locates back of house uses of kitchens, amenities, plant and corridors to the streetscape elevation up to second floor

level, where such height is achieved to provide significant parkland and CBD views to the north over Centennial Park.

Below second floor level, the layout makes no use of the north facing aspects to internally distribute light. The scheme presents blank walls to the street at these lower podium levels, emphasising low priority of presentation and interface to the adjoining public spaces. It is understood the focus of the building lies within the racecourse, however this does not omit the need for high quality architectural solution in the way the building defines and addresses the public space of Alison Road.

The open second floor terrace and pool areas are elevated and highly exposed to weather conditions, most notably from the south. The built form is expected to funnel winds through the roughly three metre high terrace area. The standard of amenity within these spaces during even mild weather events is expected to be low, comparable to that of a wind tunnel.

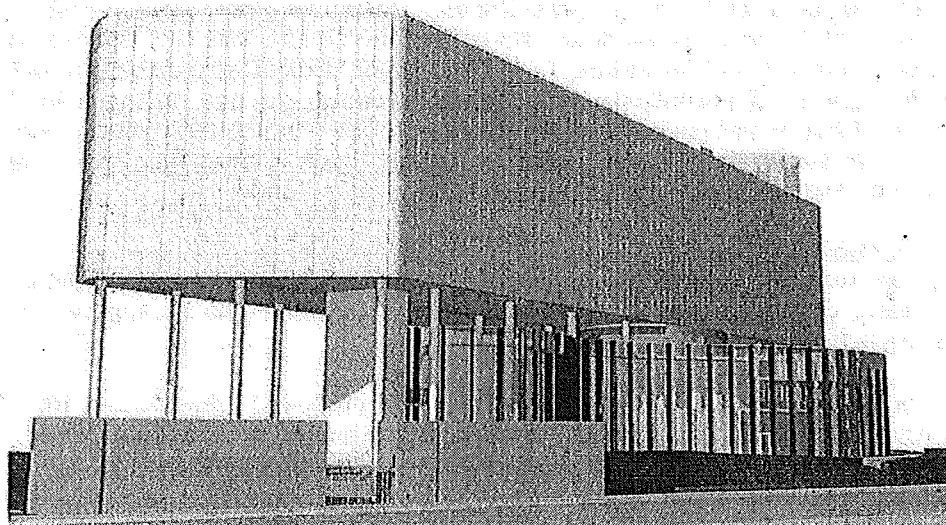
Recommendation:

Further design development is necessary in order to find alternate means of disguising back of house operations from the exterior of the building and improving the interface with Alison Road, making better use of the site's northerly aspect.

Further design development is required to devise means by which a wind tunnel effect to the exposed second floor terrace and pool areas could be avoided, improving amenity.

o Facade treatment:

Improved integration of articulating and modulating elements is essential to improving the appearance and relationship of the development to the public realm. The current scheme attests to a 'closed façade fronting Alison Road' to offset acoustic impacts. This approach omits any relief to the presentation of the building envelope, accentuating the mass and horizontality of an elevated box to the adjoining public spaces.



a) View from Alison Road looking west

The external materials used relate poorly to the heritage Turnstile and Members Stand structures, as well as the adjoining heritage conservation areas the building dominates. The use of a graphic decal to provide visual interest is

unsatisfactory for a development of this size, prominence or within such immediate proximity to elements of heritage significance. The proposed equine decals are not reflective of a high quality landmark development, of which the applicant seeks.

Large spans of glass will introduce distracting glare to motorists on the busy thoroughfare of Allison Road, as acknowledged by the applicant's reflectivity consultant. The extensive use of glazed surfaces and absence of screening will incite heavy reliance upon mechanical ventilation, given unobstructed solar exposure to the north and west elevations, where the proposed suites make use of these elevations to obtain views.

Recommendation:

The Department of Planning and Infrastructure (DP&I) is strongly urged to pursue large scale design amendments with the applicant. While noting and supporting the comments from the DP&I urban design unit, it is recommended that a formal review of the design, including revisions, should be undertaken by an independent expert, such as the Government Architect, prior to determination.

The façade treatment requires substantial redesign to improve visual interest in the hotel component of the building, make some effort to offset bulk and scale and improve the interface of the development with the street. The applicant should investigate a façade treatment of greater lifespan and quality than the proposed equine themed decals, providing articulation, glare offset and relief from solar exposure.

o Signage:

The proposal includes ground level signage related to the carpark and foyer entry, as well as rooftop signage. In relation to the proposed carpark and foyer signs, the detail of the signage is not clear and further detail is required - signboards/individual letters/free standing signage/fixed to a surface. In relation to the rooftop signage, the application proposes one north facing and one south facing sign, each having a total length of 38m and a height of 3m.

Council's Development Control Plan for Outdoor Advertising Includes Objectives and Controls for signage in Open Space Zones. Objectives and controls seek to minimise the visual impact of outdoor advertising and ensure that it is low key in appearance. Within Business Zones, roof signs which project above the parapet of the building are not permitted. The proposed rooftop signage having a total area of over 100m² is not considered to be low key. The illumination of such large signage will result in immensely negative impact upon Centennial Park, the adjoining conservation areas and will be prevalent across Randwick.

Recommendation:

The proposed roof top signs to the hotel building are not supported and should be deleted, being of excessive size and inappropriate location. The illumination of this signage is firmly opposed by Council.

Full details are required to adequately assess the proposed carpark and foyer signs, including whether the signage comprises signboards or individual letters, and whether the signage is free standing signage or fixed to a surface.

Heritage Advice

Advice was sought from Council's Heritage Planner in relation to the proposal. The following advice was provided.

- o Siting

The site for the proposed building is at the far eastern end of the Spectator precinct where the track meets the Alison Road boundary. Existing structures which relate to the track are all set much further back from the street.

The site has elements of State Heritage significance and comments of the Heritage Office will also be important to consider.

- o Form

The envelope of the tower will apparently be of a similar height and bulk of the new and modified stands, but will be considerably higher than heritage structures including the Official Stand and adjacent single storey including the Swab Building and the Turnstile building. The overall height of the tower will be around 20m higher than the adjacent Official Stand and around 29m higher than the Turnstiles building, with the underside of the projecting tower around 9.5m above the parapet of the Turnstile building. The visual dominance of the development in relation to the Turnstiles building is illustrated by the submitted photomontage.

There are concerns that the approval of a bulky structure to the east of the Official Stand, with a reduced setback from the track, will dominate the Official Stand when viewed from the Infield Precinct and the Spectator Precinct. There are concerns that the approval of a bulky structure so close to Alison Road will dominate the entry into the Spectator Precinct.

The Urban Design Statement suggests that the proposed "glazed wrap" incorporating abstract equine imagery will meld the building with its parkland setting. Despite this surface treatment, it is considered that the proposed hotel will have considerably greater prominence in the Alison Road streetscape than the new and modified stands due to its minimal setback from the street. The recommended redesign should also consider these issues.

- o Views

The Urban Design Statement and Statement of Heritage Impact submitted with the application suggests that important views into the site from Alison Road and Darley Road will be maintained by the proposal. Diagrams which have been included indicate that the siting of the podium and the height of the underside of the tower above the ground will maintain these views. This approach has been unsuccessfully adopted on the Tempe House site, where supporting columns and the overbearing form of the apartments above considerably detract from the appreciation and enjoyment of the view of the historic building. Given the 12m height of the proposed columns which support the tower above the ground, there are concerns that the public spaces below the tower will have a poor standard of amenity.

- o Tree removal

The Port Jackson fig which is to be removed to accommodate the proposed building has been identified as having Exceptional significance. The loss of a further mature tree within the Spectator Precinct is regretted, and the recommended redesign process should include options to retain and integrate the tree with the hotel design.

- o Trackside bar

While the proposed bar structure will interrupt the open sweep of the trackside in front of the existing stands, including the Officials' Stand, the new stands and the proposed building (and would preferably be deleted), it is noted that the proposed structure has a modest footprint and is single storey in scale.

- o Turnstiles building

Details of proposed conservation works are not clear as any notes on the elevation are illegible in electronic format. Details of the proposed interpretative installation for the Turnstile building will include reinstatement of openings and replacement of missing doors to former ticket booths. Appropriate consent conditions should be included requiring the submission of further detail.

- o Aboriginal Heritage

The Aboriginal Heritage and Historical Archaeology Preliminary Assessment prepared by Archaeological and Heritage Management Solutions should be submitted to the La Perouse Local Aboriginal Land Council, for their information. Any comments or concerns raised by the Land Council should be incorporated into the report.

Consultation with the La Perouse Local Aboriginal Land Council should continue, regarding Aboriginal cultural heritage management and interpretation at the Racecourse.

Should any unexpected historical archaeological remains or Aboriginal objects be encountered in the course of the proposed development, work should cease in the immediate vicinity, and the Office of Environment and Heritage should be contacted for advice.

Development Engineering advice

Advice was sought from Council's Development Engineers in relation to the proposal. The following advice has been provided.

A major application of this nature would normally be developed in consultation with a number of stakeholders, including Randwick City Council. Council's Development Engineering and Integrated Transport Sections have had little or no contact to date with the applicant regarding the development proposal and there is no evidence of prior consultation with either the RMS or STA. The STA have raised a number of concerns regarding the proposal and its potential adverse impact on the bus lane and operation of buses serving the racecourse in general.

Given that Alison Road is under the care and control of the RMS, many of the traffic measures proposed with the development may not be feasible. The traffic measures proposed in the submission include changes to the operation of traffic signals at the corner of Darley road and Alison Road and the introduction of a right turn bay in Alison Road. Both these measures are fundamental to the traffic management of the development proposal and both measures require the full support of the RMS prior to proceeding.

- o Drainage Comments

The applicant has provided a range of stormwater / drainage related technical reports which effectively state that the proposed development is suitably protected from stormwater inundation for all events up to the critical 1% AEP (plus a freeboard) and that the proposed development does not raise existing flood levels within or adjacent to the racecourse for storms up to the critical 1% AEP. Prior to approval of the development full and detailed modelling should be prepared and the consultant responsible for the modelling should certify that all habitable floor levels, openings and the entry /exit points to the basement carpark are protected up to the critical 1%AEP flood level plus 500mm freeboard. Similarly, the consultant responsible for the modelling should certify that any

variations to the 1% AEP flood levels within or adjacent to the proposed development as a result of the proposed works are negligible, (ideally less than 0.01metres).

The development proposal should be designed to *structurally* withstand hydrostatic pressure/stormwater inundation from floodwater during the probable maximum flood (PMF) event as defined in the Floodplain Management Manual (New South Wales Government, January 2001).

The applicant has stated that the internal drainage network will be designed to accommodate a 1 in 10 year storm flow. Council generally requires that all internal pipelines must be capable of discharging a 1 in 20 year storm flow. However the minimum pipe size for pipes that accept stormwater from a surface inlet pit must be 150mm diameter. The site must be graded to direct any surplus run-off (i.e. above the 1 in 20 year storm) to the proposed drainage (detention/infiltration) system.

The subject development site is located in an area that is covered by Council's onsite stormwater detention policy. Stormwater discharge from the development site must not exceed that which would occur from a 1 in 10 year storm of 1 hour duration for the existing site conditions. All other stormwater run-off from the above site for all storms up to the 1 in 20 year storm is to be retained on the site for gradual release to the receiving drainage system as required by Council. Provision is to be made for satisfactory overland flow should a storm in excess of the above parameters occur. Insufficient information is provided to assess compliance with Council's onsite stormwater detention policy however it is assumed that by draining the development back towards the existing onsite detention systems with the racecourse council's requirements can be met.

o Groundwater Comments

The geotechnical report states that there will be minimal excavation within the watertable, (possibly only the lift over-run). Randwick City Council is experiencing elevated groundwater levels across a number of areas. The subject site has the benefit of extensive and extended groundwater monitoring data and should be able to accurately determine the potential for encountering groundwater now and in the future. Council recommends that all basement levels, (and certainly the lift over-run) are designed as fully tanked systems. The structural design of the building should be carried out by suitably qualified engineers experienced in the design of structures located within or in close proximity to the water table. The structural design of the building should be prepared in close consultation with suitably qualified geotechnical engineers who have fully assessed the groundwater conditions and soil profile.

The assumptions used as the basis for developing the structural design should be monitored and tested at all stages of the proposed development's construction. No dewatering of the site should be carried out without the applicant first having obtained all necessary licences and approvals, (e.g. temporary dewatering licence from the Office of Water). Council supports suitable groundwater recharge should any temporary dewatering be proposed/required.

o Traffic Comments

The development proposal has a basement carpark with 50 spaces and then a range of options for accommodating overflow parking, including visitor parking. The parking provision within the basement is significantly lower than that required by Council's DCP - Parking and the suggested options for providing additional parking are not sufficiently definitive for Council to have surety that the

parking provision will be satisfactory to cater for peak hotel demand during race day/special events.

It is noted that the ATC, UNSW and Randwick Health Campus has been working with the Council and the State Government for the introduction of light rail to Randwick. However, in the interim period it is recommended that sustainable transport and access measures are put in place.

The applicant needs to clarify all options for meeting parking demand and commit to preparing a detailed parking strategy/management plan covering all potential peak parking demand scenarios. Council, the racecourse and the hotel operator need definite guidelines for the provision of parking at all times. The parking provision should in accordance with Council's DCP - Parking and the parking layout, access aisles, ramp gradients, height clearances etc should be in accordance with the relevant sections of AS 2890.1-2004.

The approved heavy vehicle traffic management plan for a recent major non-racing event on the racecourse, the 2012 Future Music Festival, relied on heavy vehicles entering the racecourse off Alison Road and travelling around the perimeter of the racecourse before entering the infield. The location and extent of the proposed development eliminates this travel route. Council recommends that any approval for this proposal be conditional upon the applicant entering into dialogue/negotiations with Council to determine a suitable alternate heavy vehicle route within the racecourse.

Transport Engineering advice

Advice was sought from Council's Manager Integrated Transport in relation to the proposal. The following advice was provided.

- o It is considered that the reliance, by the applicant, on hotel trip generation data from the United States of America is unusual and should not be used in the Randwick, Sydney, Australia context. This data may have no relationship at all to likely behaviour in Randwick. Trip generation surveys of similar tourist hotels in other regional centres of Sydney (such as Bondi / Chatswood / North Sydney) would produce more robust figures for this application.
- o Given that the trip generation figures are questioned in the point above, the impacts of the 'comings and goings' from this hotel are difficult to quantify. The effect on the operation of the signals cannot properly be gauged. The likely resultant delays to all other movements at the signals cannot be assessed. Ultimately the operation of traffic signals and the efficiency of the State Road network (Alison Road being a State Road) is the responsibility of Roads and Maritime Services (RMS). It is considered that the Council should defer to RMS for comments on the expected impacts of this proposal on the operation of the signalised intersection and the likely impacts to the State and local road systems.
- o Notwithstanding the above comments, it is noted that the proposed 'racecourse road' continues beyond the proposed hotel driveway somewhere into the further racecourse land. It is unknown what land uses this additional spur road will be servicing and it is unknown as to the likely traffic generated by this spur road. These figures must be supplied and included in the assessment of the performance of the traffic signals and the road system.

- o The proposed geometry of the 'right turn in' lane for eastbound Alison Road traffic seems compromised. It would seem, from the images provided, that a larger vehicle (truck / bus) may not be able to execute an efficient right turn into the site if exiting vehicles are propped in 'racecourse road' awaiting a green signal. Also, the proposed length of the right turn bay into the site would seem insufficient to cater for any but the most minimal of demand. Any significant right turn demand would quickly 'tail back' west along Alison Road throttling the through traffic capacity down to a single lane. Again, this is a specific matter for the consideration of the authority mandated with the care and control of the State Road system and of traffic signals within NSW, Roads and Maritime Services.
- o If looking at a redesign of the traffic signals, it is considered that the applicant must include the provision of an additional pedestrian facility across Alison Road, west of Darley Road. The development includes a public bar and will also have facilities available for public events. Visitors to the bar or to public events will choose their own location for parking. Despite the suggested provision of ample parking on and adjacent to the site it can be expected that there will be numbers of visitors who, for their own reasons, choose to park in nearby streets. Getting these pedestrians quickly and safely across the State Road, Alison Road, is a priority. It is for their protection that pedestrian signals across the western (Alison Road) arm of the intersection are required, in addition to the current signals on the eastern side of the intersection.
- o The applicant suggests that visitors to the proposed facility can utilise nearby Bus-Way area parking spaces (outside major event times) and that an additional overflow parking area can also be utilised. It is considered that a sound Parking Management Plan must be prepared addressing these matters. The plan must indicate what signage will be utilised where. It must indicate what events / occurrences will trigger the allocation of hotel staff resources dedicated for the sole purpose of parking and traffic control. This Plan should be approved by the Council and should include a provision for a quarterly report to the Council informing all details of the use of the overflow parking (dates, times, no. of vehicles etc). Also, depending on the observed, measured and reported impacts of the Plan, the Council should retain an ability to alter the conditions applying to the Parking Management Plan (for example, to redefine the 'triggers', require additional staffing etc)
- o The Loading area seems to be a very difficult facility to access. The turning movements are very tight and a number of conflict points between service vehicles and car park guests, as well as pedestrians, seem apparent. Consideration should be given to a redesign of this facility to reduce likely conflict points and to introduce a "more understandable" access facility for delivery drivers. The currently proposed tight configuration will likely result in servicing from 'racecourse road'.
- o The sightlines between motorists and other manoeuvring vehicles seem to be sub-standard. Motorists (guests or valets) leaving the porte-cochere wishing to access the underground parking may not sight vehicles emerging from the underground parking in sufficient time to take evasive action. The proximity of all these driveways (porte-cochere / delivery dock/ carpark ingress / carpark egress) gives rise to concerns about safety. At times all of these movements could be very busy (e.g. at the end of a major race meeting) and the likelihood of an incident could be

great. Another resultant of the proximity of these driveways is a possible 'locking up' of the local system as 'tricky' manoeuvres are attempted between users. Consideration must be given to better separating these vehicle access points for safety and operational reasons.

- o The proposal will generate an increase in use of the nearby bus stop (for services to the City / Central). Given this likely increase in use of the bus stop it is considered that the applicant should make provision for a localised widening of the shared path behind the existing bus shelter, so as to better accommodate an increased congregation of bus passengers on this path which operates as a major cycle link shared path access to the University of NSW.
- o Transport Access Guides (TAGs) for specific events such as Major Race Days must be developed for this facility. The Transport Access Guide must be prepared in accordance with the RTA's Guide to Producing and Using Transport Access Guides and other guidelines/standards considered best practice.
- o The location of this proposed facility may remove the ability for larger truck combinations to service major events (e.g. Future Music Festival) at the racecourse. Previously larger truck access was directed to the residential Wansey Road for access to the infield. This resulted in unsafe traffic situations and caused safety localised congestion. Recently these truck combinations have had access directly off Alison Road. The applicant must guarantee that direct access for large truck combinations, associated with major events, can still be provided, without compromising safety or traffic flow on roads and streets (especially residential streets) alongside the racecourse.
- o To improve traffic safety (including protecting pedestrians/patrons attending the event), the proponent should engage a suitably qualified traffic consultant to apply to RMS, to reduce the speed limit on Alison Road, between Anzac Parade and Darley Road, from 70km/h to 60km/h.
- o Given the critical location of this proposal, advice provided by the RMS, STA, Transport for NSW, should be properly considered and, as appropriate, incorporated as conditions of development consent.

These comments raise significant issues that may affect the fundamental design, footprint, layout, access and circulation of the proposed hotel. It is recommended that these issues are thoroughly reviewed and addressed, and incorporated into revised development application drawings/documentation.

Landscape and significant tree advice

Advice was sought from Council's Landscape Development Officer in relation to the proposal. The following advice was provided in response.

There are four major, mature, native trees that will be affected by this development. All these trees are clearly visible along the Alison Road frontage, and they are also listed as 'Scheduled Items & other components/associated plantings' in Volume 3 of Council's Significant Tree Register.

- o **Trees 41 and 42**, as documented in the above referenced reports, are shown as being retained in conjunction with the proposed development.

These trees are Port Jackson Figs, (Group D, Item 32), are 16-18m tall x 12-14m across, and are close together, in a northeast-southwest alignment, northeast of the existing grandstand building. Tree 41 is further away from the works, so any impact will be minimal. The Tree Management Plan specified in Appendix O of the Arborist's Report must be implemented to ensure the preservation of Tree 42, as the close proximity of excavation and construction works will require detailed supervision, with the pruning of lower limbs also to be required for clearance reasons.

- o **Trees 43 and 45** are marked for removal. Tree 43 is a 15m tall Silky Oak and Tree 45 is a 16m x 12m Port Jackson Fig. Tree 43 is an associate planting, of relatively low landscape value and no objections are raised to its removal to allow for the driveway/footpath, with a replacement Moreton Bay Fig to be planted in the open grass area to its southwest.
- o Tree 45 is a significant tree, part of the group D planting, which is in direct conflict with the works, and while transplanting was considered, it is not a favoured option by either the Arborist or Council. **The removal of T45 as shown is not supported at this stage and Council believes that every consideration should be given to a redesign of the development to facilitate retention of this tree.**

The landscape details as documented in the planting plan are generally satisfactory.

Environmental Health Advice

Advice was sought from Council's Environmental Health Unit in relation to the proposal. The following advice was provided.

- o Land Contamination

A report prepared by Douglas partners completed a phase 1 contamination report that found the potential for contamination to be low and contamination risk was largely due to importation of fill. The report recommended a phase 2 contamination report be undertaken to assess presence for contaminants. Following this assessment appropriate RAP and EMP plans will be drafted.

The consultant confirmed based on the site history and field observations the site has a relatively low potential for contamination with the exception imported fill placed on the site.

The consultant also confirms the site can be made suitable for the proposed commercial use subject to further investigation and remediation of contaminated soils identified.

Appropriate conditions including validation compliance with required criteria (DECC Guidelines) should be a requirement of any determination.

- o Acoustics

The potential noise issues associated with this development are considered to be:

Noise from plant and equipment and operation of the hotel and associated uses within racecourse:

- Impact of existing ambient, establish noise criteria
- Identify operational noise sources

- Review compliance with noise criteria
- Determine noise controls required.

The report confirms based on distance propagation of noise and shielding noise impacts associated with mechanical plant will not be significant and can be managed appropriately.

Acoustic Logic have assessed potential impact from construction, operation and internal acoustic levels for the hotel. Acoustic Logic have recommended the following:

- A detailed construction noise management plan be completed;
- The building structure and façade be provided with acoustic treatments;
- Mechanical plant be treated with acoustic attenuation measures;
- Detailed attenuation measures be undertaken at construction certificate stage to determine appropriate acoustic controls.

Appropriate conditions including compliance with the acoustic assessment should be a condition of any determination.

- Food Safety

Compliance with the relevant legislation and guidelines including fixed food facilities should be imposed upon any consent issued.

- Waste management

Operation of the facility will generate a variety of solid and liquid wastes including biological wastes, and requires a range of management strategies.

Appropriate conditions should be included in any consent issued.

Environmental and Residential amenity;

The racecourse is located within an established residential context, of which continually raises issue for Council throughout race days and major events, placing significant strain upon Council resources. The subject application now seeks to operate a large scale licensed premises, thereby increasing accessibility of alcohol and establishing an operation not restricted to the parameters of allocated race days and special events.

- Operational intensification

There is a concern regarding any proposed intensification of licensed premises or promoting ease of access to alcohol within the racecourse site.

Those attributes of the proposal pertaining to increased patrons, increased hours of operation (including operation outside of allocated race days) or provision of a stand alone licensed premises, would all contribute to such an intensification and would be unlikely to gain favourable view of Council. The specifics of this operational detail have not been made entirely clear within the submitted documentation.

The provision of any licensed bar and restaurant facilities must be consistent with the core event-based nature of the racecourse site, and with the surrounding context. Of substantial concern is the possibility of the current proposal initiating a new entertainment precinct within the racecourse, which no longer solely serves the operation and race day events of the ATC, and which may create frequent ongoing social amenity and safety impacts on the surrounding area.

The site is isolated from similar activities by Centennial Park and the greater racecourse site, providing little opportunity for passive surveillance at night. Any increase in operational intensity may accentuate recurring environmental impacts to surrounds of noise, vandalism, trespassing, antisocial behaviour, transport and waste. These issues are presently restricted to race days and major events on the site. The ability of the operator to continually and proactively mitigate environmental impacts within the established residential surrounds of the racecourse, is questionable.

Furthermore, the information received by Council provides only a vague indication of additional mitigation measures for a potentially significant increase in patronage, by way of a Functions and Events Management Plan and the broader EIS. Within the documentation, the applicant is not forthcoming on immediately relevant operational issues of maximum patron capacity, trading hours, staff and security, proactive mitigation and preventative measures for excessive noise, anti-social behaviour, transport and general management of the premises. It is considered that a significantly improved Plan of Management is required to enable thorough assessment of the proposed operation.

Recommendation:

The applicant should provide further detail on the operational impacts associated with the development, including (as a minimum) specific indications of patron capacity, trading hours and management provisions.

Should the proposed bar and restaurant uses receive endorsement, their operation should be managed by ensuring such uses are related to the hotel (ie: accommodation) operation. It is imperative that strict conditions be imposed in order to protect the amenity of surrounding residents, safety of patrons and the wider community.

Section 94A Development Contributions

Council's Section 94A Development Contributions Plan applies to development in the racecourse precinct. Pursuant to this plan, a contribution of 1% of the total cost of works shall be paid to Council. A condition of consent could be applied in the interest of enforcing the plan.

Category	Cost	Applicable Levy	S94A Levy
Development cost \$200,000 and over	Documentation notes \$43.1 million	1.0%	\$430,000

Council's Section 94A Development Contribution Plans may be inspected at the Customer Service Centre, Administrative Centre, 30 Frances Street, Randwick or at www.randwick.nsw.gov.au.

Conclusion

While the proposed development stands to provide the Australian Turf Club and greater Randwick locality with economic and social benefits, the distinct environmental impacts of the development cannot be ignored. Council raises serious concern around the impacts.

On this basis, the Department of Planning and Infrastructure is strongly urged to pursue large scale design amendments with the applicant prior to proceeding with the application. A formal review of the design, including the recommended amendments, should be undertaken by an independent expert, prior to determination.

The above issues are pertinent to maintaining environmental amenity and providing a high quality design outcome to this prominent site, in the interest of both Council and the wider community.

If you have any queries or wish to further discuss any of the issues raised above, please contact Joanna Hole or Scott Williamson, in Council's City Planning Department, on 9399 0999.

Yours sincerely,


Sima Truuvert
Director, City Planning
Randwick City Council

