



Australian Turf Club Royal Randwick Racecourse-Hotel Response to Submissions



Prepared for the Australian Turf Club • November 2012



AUSTRALIAN TURF CLUB

urbis

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Statement of Validity

This Response to Submissions Report has been prepared as requested by the Department of Planning and Infrastructure (DPI), following their assessment of the Environmental Impact Statement (June 2012) that was prepared by Tom Goode and Jim Murray of Urbis Pty Ltd on behalf of the Australian Turf Club.

This Response to Submissions Report has been prepared in response to the DPI letter dated 17 September 2012 by the following:

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Bachelor of Landscape Architecture (University of Canberra)
Post Graduate Diploma Town Planning (University of Westminster)
Jim Murray (Consultant)
MSc Urban and Regional Planning (Heriot-Watt University, Edinburgh)

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Sydney NSW 2000

Land Details: Royal Randwick Racecourse, Alison Road, Randwick. Lot and DP: Part Lot 2009 in DP 1169042

Applicant Details: Australian Turf Club

Applicant Address: Royal Randwick Racecourse, Alison Road, Randwick

Project Summary: Construction of an eight storey building to accommodate a hotel and ancillary conference, restaurant and bar facilities with basement parking.

Declaration

We certify that the contents of the Response to Submissions Report is to the best of our knowledge true in all material particulars and is not misleading.

Matthew O'Donnell (29 November 2012)

Jim Murray (29 November 2012)



Executive Summary

This report has been prepared in response to the letter from the Department of Planning and Infrastructure (DPI) dated 17 September 2012 requesting a Response to Submissions Report to be prepared for SSD 5002-2011. The letter requested the Proponent's Response to Submissions respond to specific issues raised by the DPI and other stakeholders during the assessment and consultation process of the Environmental Impact Statement (EIS) of the Proposal for the development of the land at the Royal Randwick Racecourse (RRR) Alison Road, Randwick.

It is important to note that during the exhibition period for the EIS, 1,000 notices were issued to surrounding Randwick City Council residents, of which 11 (1.1% including residents groups) public submissions were received. This represents a very small portion of surrounding residents who object to this proposal.

This report responds to all the submissions that were received during the exhibition, and subsequent meetings with the DPI on 23 October 2012 that discussed matters in the response to submissions requirements letter.

As part of the preparation of this response the proponent has undertaken further consultation with key stakeholders including the NSW Department of Planning and Infrastructure, RMS and STA to discuss the proposed modifications proposed in the Response to Submissions.

The report includes a response to each of the issues raised by the DPI and includes a number of additional expert inputs including heritage, traffic, thermal engineering, solar reflectivity, flooding and urban design. The Response to Submissions also includes the following key amendments to the original proposal:

- Removal of roof top signage above the parapet and provision of a façade sign advertising 'Adina' at Level 7 of the façade fronting Alison Road.
- Relocation of 'Royal Randwick' rooftop signage at ground level as entry signage for the racecourse.
- The columns on the east and west ends of the proposed building have been moved inwards towards the central core of the building by 2.5m to increase the cantilever of the upper floors of the building.
- Stair cores within the undercroft space have been amended to incorporate a continuous surrounding steel mesh planter screen and steel fins to replicate the podium façade design.
- The soffit to hotel room undercroft has been developed to include a dynamic reflective metal cladding system, with the linear effect of expressed joints used to emphasise the interest in this space and catch reflections of passing movements.
- Improvements to the proposed traffic management operations on event days including the proposed new bus staging area within the busway along Anzac Parade/Centennial park to stable up to 13 buses prior to their entering the site from the proposed right hand turn from Alison Road, and removing the current arrangement of staging buses within Darley Road prior to their entry to the ATC bus layover.

As outlined in the body of this report, the proponent is of the opinion that the proposal is the appropriate built form and design response for the site, but nevertheless has undertaken some important design modifications to refine the proposal. The amendments to the proposal and additional information provided are considered an appropriate response to the issues raised during the consultation and assessment process for the Proposal.

We believe the preferred scheme provides an optimum balance between providing hotel accommodation to service the regional market needs and contributes to strategic planning targets for the Randwick Specialised Centre, as well respecting the sites environment and local context qualities. The revised proposal delivers a built form which will have minimal impact on surrounding land uses.

The other key benefits which the amended proposal will deliver include:

- Assist Destination NSW's goal to double the supply of hotel rooms in the State by 2020.
- Diversification of the existing uses at the RRR for racing and non-race day events.
- Support the ATCs vision to create one of the world's premier thoroughbred racing experiences.
- Provide high quality accommodation, hospitality, conference and recreation facilities, to meet the needs of the existing ATC membership, attract new members, and support the growth of tourism in the Randwick LGA, Sydney and NSW.
- Ensure the future viability of the RRR as the pre-eminent Racecourse in Sydney.
- Financial contributions in accordance with Randwick Council's Section 94 Contributions Plan.

In conclusion, it is considered that the proposed Response to Submissions Report has suitably addressed all matters raised in the submissions. The site location, use as an entertainment precinct and context is appropriate for hotel accommodation that is supported by conference facilities. The proposal is suitable for the site and its context and will positively contribute to achieving the aims and objectives for the Randwick health and education precinct as the locality continues to evolve as a "Specialised Centre".

1 Introduction

1.1 OVERVIEW

This Response to Submissions Report relates to the proposed development of a Hotel and ancillary facilities at Royal Randwick Racecourse (RRR), Alison Road, Randwick. The report was prepared in response to a request by the Department of Planning and Infrastructure (DPI) in their letter dated 17 September 2012. The DPI letter is attached as **Appendix A**.

The application number for this project is SSD 5002 – 2011 and the applicant is the Australian Turf Club (ATC).

The project was publicly exhibited by the DPI from 1 August 2012 until 31 August 2012. Submissions received were provided to the ATC and have been addressed within this report and in detail at **Appendix B**.

This Response to Submissions has been prepared in response to the issues raised by the DPI, the NSW Roads and Maritime Service (RMS), Randwick City Council (RCC) and other authorities and stakeholders to the proposal who responded during the State Significant Development Environmental Impact Statement assessment and consultation process.

The key planning issues to be further addressed in this Response to Submissions report were outlined in the formal written response from the DPI dated 17 September 2012 to the Environmental Impact Statement documentation. These include:

- Bulk and scale.
- Urban design.
- Traffic and parking.
- Operations and management.
- Signage.

This report is accompanied by revised and additional architectural drawings and perspectives; relevant specialist reports addressing the issues raised during the exhibition period, and additional information requested for the final assessment and determination of the proposal.

This report has been prepared to outline the proponents preferred design in response to the assessment consultation process and to minimise the environmental impacts of the proposal.

The report has been structured to:

- Summarise the key overall amendments to the proposal.
- Address the primary issues raised by the DPI, and outline the amendments adopted by this Response to Submissions in response to these issues.
- Provide a detailed and updated description of the proposed development.
- Outline the proponent's response to the secondary issues raised by the Agencies and other stakeholders.
- Provide a revised summary of mitigation measures which reflects the preferred proposed in this report and key stakeholder issues.

1.2 SUMMARY OF AMENDMENTS

The proponent has considered the Response to Submissions requirements of the DPI and considered that in order to address these requirements some minor amendments to the proposal would be beneficial.

In response to the issues raised through submissions and consultation with the DPI, RMS and the RCC, the original scheme has been modified.

The proposed changes to the proposed developments design addressed in this Response to Submissions Report are:

- Removal of roof top signage above the parapet and provision of a façade sign advertising 'Adina' at Level 7 of the façade fronting Alison Road.
- Relocation of 'Royal Randwick' rooftop signage at ground level as entry signage for the racecourse.
- The columns on the east and west ends of the proposed building have been moved inwards towards the central core of the building by 2.5m to increase the cantilever of the upper floors of the building.
- Stair cores within the undercroft space have been amended to incorporate a continuous surrounding steel mesh planter screen and steel fins to replicate the podium façade design.
- The soffit to hotel room undercroft has been developed to include a dynamic reflective metal cladding system, with the linear effect of expressed joints used to emphasise the interest in this space and catch reflections of passing movements.
- Improvements to the proposed traffic management operations on event days including the proposed new bus staging area within the busway along Anzac Parade/Centennial park to stable up to 13 buses prior to their entering the site from the proposed right hand turn from Alison Road, and removing the current arrangement of staging buses within Darley Road prior to their entry to the ATC bus layover.

Other public benefits that were exhibited within the original EIS include:

- The proposed development of a 4 star Hotel at the site will result in positive economic impacts through the provision of direct and indirect employment (during both construction (in excess of 100 jobs) and operation (approx. 35 permanent) and the broader multiplier that comes with tourism accommodation.
- The Hotel will provide much needed accommodation to support the Randwick Specialised Centre, the thoroughbred racing industry, ATC members, and tourists and workers.

Table 1 provides an overview of the key numerical data for the modified design outlined in this report.

TABLE 1 – NUMERIC OVERVIEW OF PROPOSAL

PROPOSED HOTEL, ALISON ROAD, RANDWICK	RESPONSE TO SUBMISSIONS PROPOSAL
Site Area	9,000m ²
Gross Floor Area	11,109m ²
Land Use	Hotel and function centre
Rooms / Suites	170
Meeting Rooms	204.08m ²
Conference Rooms	209.88m ²

PROPOSED HOTEL, ALISON ROAD, RANDWICK	RESPONSE TO SUBMISSIONS PROPOSAL
Restaurant	188.66m ²
Bar	83.79m ²
Parking Spaces	50 spaces
Building Height	8 storeys RL64.400
Setback from Alison Road	5m from L3-7 hotel wing and 11m from lower form
Setback from the Official's Stand	25m from L3-7 hotel wing and 56m from G-L2 lower form
Setback from the existing turnstiles	0m from L3-7 hotel wing (it sits in line above at closest point) and 5m from lower form

No changes to the gross floor area or height of the building have been made.

2 The Original Application

The Environmental Impact Statement (EIS) for the project application was prepared in accordance with Part 4.1 of the *Environmental Planning and Assessment Act 1979*, Schedule 2 Part 3 of the *Environmental Planning and Assessment Regulations 2000* and *SEPP (State and Regional Development) 2011*. The EIS was lodged with the DPI in June 2012 (SSD 5002 - 2011).

A Planning Proposal seeking to amend the Randwick LEP 1998 to permit the proposed uses was lodged with the DPI in April 2012. Both the SSD application and the Planning Proposal are being assessed concurrently by the DPI.

The EIS addressed the following:

- The site context and analysis of the surrounding area.
- The ATC Vision for the RRR.
- The proposed development.
- The Director General's Environmental Assessment Requirements (DGRs).
- The environmental impacts of the proposal in accordance with the requirements issued by the Director General.
- Proposed mitigation measures.

2.1 THE ORIGINAL PROPOSED DEVELOPMENT

The following Section summarises the details of the original design as assessed by the EIS.

2.1.1 PROJECT OBJECTIVES

The key objectives of the proposal are:

- Diversify the existing uses at RRR for racing and non-race day events.
- Support the ATCs vision to create one of the world's premier thoroughbred racing experiences at RRR.
- Provide high quality accommodation, hospitality, conference and recreation facilities, to meet the needs of the existing ATC membership, attract new members, and to support the growth of tourism in the Randwick LGA, Sydney and NSW.
- Ensure the future viability of Royal Randwick as the pre-eminent Racecourse in Sydney.

2.1.2 THE ORIGINAL PROJECT APPLICATION

The project application sought approval for:

- *Partial Demolition of the Alison Road boundary fence; the brick toilet block adjacent to the Alison Road entrance; and the two stewards towers located against the racetrack.*
- *Removal of the Oaks Marquee temporary structure.*
- *Conserve and reuse the former Turnstile Building.*
- *Construction of a new eight storey building accommodating a hotel (170 rooms), bar, restaurant, ancillary conference facilities, and outdoor swimming pool.*
- *Construction of a single level of basement providing parking for up to 50 vehicles, bathrooms, storage and ancillary spaces.*

- *Construction of new outdoor bar facilities at the western part of the development site adjacent to the Official's Stand.*
- *Landscaping and public domain works, including the construction of a concrete terrace behind the former Turnstile Building, and the removal of two trees.*
- *Business identification signage.*

A numerical overview of the land uses, building heights, floor areas and car parking numbers of the original project application is outlined under Table 1 above.

2.1.3 LAYOUT, ACCESS AND PARKING

The following was proposed in terms of the access and parking requirements for the site:

- Access for all vehicles and pedestrians was provided from the existing site entry with revised intersection design on Alison Road. This included a right-hand turn from Alison Road into the site.
- A port cochere was provided to allow drop off and pick up for visitors/users.
- Car parking for 50 cars was provided at the basement level and was secured by boom gates and roller doors.
- The car park included three accessible spaces and bike parking for 5 bikes.
- A loading bay was provided at the basement level for a medium rigid vehicle.

2.1.4 MITIGATION MEASURES

In accordance with the DGRs, the EIS contained mitigation measures to be undertaken by the ATC to minimise the potential impacts arising from the proposal. In summary, these included the following recommendations:

- Completion of a Phase 2 contamination assessment and preparation of Remediation Action Plan or Environmental Management Plan if required.
- Classify excavated waste as per the NSW DECC Waste Classification Guidelines: Classifying Waste (2008, revised 2009) prior to off-site disposal to a suitably licensed landfill.
- Mitigate the removal of tree L45 by replacing it with a 'super-advanced' specimen of the same species.
- Include measures that focus on climate change mitigation by minimising the hotel developments greenhouse gas emissions.
- Ensure compliance with Section J of the National Construction Code and meeting the Minimum Energy Performance Standards (MEPS) Regulations of Australia for equipment and appliances.
- The achievement of a predicted 4.5 star Whole Building NABERS Hotel Energy rating.
- Ausgrid and all utilities providers are consulted prior to completion of design development to ensure that any necessary infrastructure upgrade works to service the facility are accounted for.
- A detailed construction management plan outlining noise mitigation will be provided once a building contractor is appointed as part of the construction approval process.
- The building structure and external façade will require acoustic treatment to ensure appropriate internal noise levels can be achieved.
- Amendments to the intersection arrangement to provide a right turn movement from Alison Road in to the site (i.e. vehicles arriving from the west) and egress from the site, via all turning movements, and the addition of two traffic signal phases.

- Additional overflow parking areas (up to 4,000 vehicles) is identified across the site for patrons utilising the hotel on race days when the busway parking is not available.
- Preparation of a Schedule of Conservation Works for the former Turnstile Building to guide the proposed works to this building.
- Consultation with the La Perouse Local Aboriginal Land Council should continue with consideration given to any concerns or comments that are raised.
- Water quality improvement measures including first flush treatment of runoff from the building and bio-retention swale for treatment of runoff from roadways.
- A final Erosion and Sedimentation Control Plan would need to be prepared by the builder prior to construction.

3 Summary of Key Issues from Public Submissions and Public Agencies

The project was placed on public exhibition from 1 August 2012 until 31 August 2012. The submissions received by the DPI were provided to the ATC and are addressed as part of this Response to Submissions Report. Table 2 outlines the submissions that were received by the DPI during the exhibition period.

TABLE 2 – LIST OF SUBMISSION RESPONDENTS

SUBMISSIONS
NSW Department of Planning and Infrastructure – Urban Design Review
Heritage Council of NSW – Heritage Branch
NSW Transport – Roads and Maritime Services
NSW Transport – Sydney Buses
NSW Police – Eastern Beaches Local Area Command
NSW Environmental Protection Authority
Sydney Water
Randwick City Council
11 x Public Individual Submissions (3 anonymous)
Randwick Precinct – Resident Community Group
Kensington and West Precinct – Resident Discussion Group

3.1 PUBLIC SUBMISSIONS

During the exhibition period for the EIS, 1,000 notices were issued to surrounding Randwick City Council residents, of which 11 (1.1%) public submissions were received.

The 11 submissions received from the public (including resident groups) raised the following key issues:

- Traffic, parking and access.
- Height and design.
- Anti-social behaviour and residential amenity.
- Land use.

The proponent has prepared a detailed response to the issues raised in the public submissions. This is attached as **Appendix B**.

3.2 AGENCY SUBMISSIONS

A total of eight government agency submissions were received (excluding the DPI letter 17/9/12). They identified the following key issues:

- Architectural design and built form.
- Heritage impact.
- Drainage and groundwater.
- Traffic, parking and access.
- Landscaping and tree removal.
- Environmental and residential amenity.

The proponent has prepared a detailed response to the issues raised in the agency submissions. This is attached as **Appendix B**.

3.3 FURTHER AGENCY CONSULTATION

As part of the preparation of this report the proponent has undertaken further consultation with key stakeholders including the NSW Department of Planning and Infrastructure, RMS and STA to discuss the proposed modifications proposed in the Response to Submissions.

In summary the meetings included:

- Department of Planning and Infrastructure – 23rd October 2012 – presentation made summarising the proposed responses to the DPI letter dated 15 September.
- RMS – 8th November 2012 – presentation made regarding the points within RMS's submission. Additional traffic management measures (e.g. bollards) added into design.
- Randwick Council – meeting scheduled for 27 November 2012.
- Sydney Buses – 15 November 2012 regarding Sydney Buses submission.

4 Response to Submissions Requirements

The DPI letter dated 17 September 2012 outlines the issues the DPI have requested to be addressed by this report. The DPI identified the following key issues during their preliminary assessment and upon consideration of the public and agency submissions:

- Bulk and scale.
- Urban design.
- Traffic and parking.
- Operations and management.
- Signage.

Attachment 1 of the DPI letter expands upon these issues. The following section details the DPI's comments and the proponent's response to each one in turn below.

TABLE 3 – THE RESPONSE TO SUBMISSIONS REQUIREMENTS

REQUIREMENT	RESPONSE
BULK AND SCALE <i>The proposal is not considered to provide an appropriate response to the site in terms of its bulk and scale, given the high visibility of the site from surrounding areas. Consideration should be given to the following issues:</i>	
▪ <i>the appropriateness of the reliance on the scale of the approved Grandstand building and nearby TAFE building (which are the tallest surrounding structures) to justify the height and bulk of the proposal. Further consideration should be given to an appropriate response to the general site context, including predominant building forms and heights.</i>	Refer to 6.2
▪ <i>the relationship of the proposed building with Alison Road, in terms of bulk and scale, with consideration given to opportunities to reduce visual impacts through the redistribution of building mass.</i>	Refer to 6.2
▪ <i>the dominance of the proposed building within its historic setting and the need for the proposal to support and be sympathetic to the historic significance of the Racecourse site.</i>	Refer to 6.6
▪ <i>the success of the proposal in terms of retaining views across the site in relation to the resulting impacts on the perceived bulk and scale of the building, when viewed from surrounding areas.</i>	Refer to 6.2
▪ <i>opportunities to reflect the curved nature of the adjoining racecourse track in the design of the proposed building, specifically at the upper levels.</i>	Refer to 6.2
▪ <i>opportunities to relocate or reduce the amount of bulk of the roof top plant.</i>	Refer to 5 & 6.2

REQUIREMENT	RESPONSE
the PPR could include a study on alternative building options, assessing the likely impacts on the perceived mass of the building. Any alternate building designs considered should investigate opportunities to retain existing significant trees.	Refer to 6.2
URBAN DESIGN	
the design of the proposed building should be reconsidered to better achieve a 'landmark building' reflecting the cultural and historic significance of the Royal Randwick Racecourse and the contextual setting of the building.	Refer to 6.2 & 6.6
The proposal should be reviewed, in light of comments from Randwick City Council, the NSW Heritage Council and the Department's Urban Designer and should specifically address the following:	
the relationship of the building with Alison Road, including the location of back-of-house and building services, the provision of attractive frontages and building articulation.	Refer to 6.2
the appropriateness of the proposed external façade treatment in terms of achieving a design appropriate for a 'landmark building'.	Refer to 6.2
the appropriateness of the proposed external façade treatment in terms of the exposed support columns, fire escape stairs and exposed underside of the upper levels.	Refer to 6.2
the appropriateness of the proposed external façade treatment in terms of the proposed use of a curtain wall with a printed imagery interlay façade.	Refer to 6.2
the appropriateness of the proposed external façade treatment in terms of the achievement of internal comfort for guests.	Refer to 6.2
the appropriateness of the proposed external façade treatment in terms of the relationship with surrounding heritage items and the Randwick Racecourse Conservation Area, within which the site is located.	Refer to 6.6
concern is also raised in regards to motorist and pedestrian safety given the findings of the Solar Reflection Analysis, which concludes that the proposal will result in unacceptable glare to drivers travelling south-east on Alison Road and potential glare to drivers travelling south on Darnley Road.	Refer to 6.4.3

REQUIREMENT	RESPONSE
TRAFFIC AND PARKING	
the proposed right turn into the site from Alison Road is not supported due to potential negative impacts on the surrounding road network and bus operations. An alternate arrangement should be considered to accommodate expected additional traffic without impacting on the existing road network. Any proposed alternate access arrangement should be supported by details of any SIDRA Modelling used, scaled plans illustrating adequate lane widths and vehicle turning circles into the site.	Refer to 6.5
the proposed use of the Racecourse accessway by taxis and private vehicles, exiting the hotel, conflicts with the intention of the Racecourse accessway to provide clear and unobstructed access for buses.	Refer to 6.5
the proposed location of the driveways, Porte Cochere and their proximity to the Alison Road intersection should be reviewed to establish whether a more efficient arrangement could be provided, which would reduce the likelihood of accidents and/or vehicle queuing which could impact upon the surrounding road network.	Refer to 6.5
concern is raised in relation to the proposed on-site parking arrangement and the variance between the proposed number of basement car parking spaces and the number of spaces required by the Randwick Parking DCP. Furthermore, the RTA Guide, on which the proposed parking rates have been based, is identified as being prepared in line with City of Sydney conditions. Opportunities for shared parking is supported however, further clarification is required in terms of how hotel overflow parking will be achieved on the Racecourse site when these areas are likely to also be at capacity.	Refer to 6.5
consideration should be given to an alternate loading/unloading arrangement to minimise conflicts with other vehicles.	Refer to 6.5
consideration should be given to the provision of a widened path behind bus shelters on Alison Road (south side) to accommodate likely additional bus patrons.	Refer to Appendix C
consideration should be given to the inclusion of pedestrian facilities across Alison Road, west of Darley Road to facilitate additional pedestrian traffic resulting from the proposal.	Refer to 6.5.3

REQUIREMENT	RESPONSE
OPERATIONS AND MANAGEMENT	
the Functions & Events Management Plan shall be revised to include (but not be limited to) the following additional information; maximum patron capacity for specific areas within the hotel and terrace areas, trading and operation hours for separate hotel uses (for hotel and non-hotel guests), propose use and locations for amplified music, details of on-site staff and security and mitigation and prevention measures to address unacceptable noise & disturbance to neighbouring residences.	Refer to 6.7
SIGNAGE	
the proposed roof signs are not considered consistent with the objectives for open space zones, identified within the Randwick Outdoor Advertising DCP. Consideration should be given to the incorporation of the signage into the building façade (not extending above the building parapet) and the use of a sympathetic size, design, colours and illumination, compatible with the site's status as a Conservation Area.	Refer to 6.6 & 6.4
an assessment of the proposed signage against relevant sections of the NSW Heritage Office's (now Branch) publication 'Statements of Heritage Impact' should be provided.	Refer to 6.4

4.1 ADDITIONAL INFORMATION

Further to the above, the DPI have requested the additional information outlined in Table 4 below.

TABLE 4 – ADDITIONAL INFORMATION AND ATC RESPONSE

ITEM	REQUIREMENT	RESPONSE
1	Architectural plans and/or photomontages illustrating the proposal in relation to existing adjoining structures, specifically in relation to the adjoining Official's Stand. The additional material shall provide details of the setbacks from existing structures and illustrate the development when viewed from both the Infield Precinct and when viewed from the rear of the members stand.	This information has been provided as part of this PPR. Architectural plans and photomontages are attached as Appendix C .
2	Additional detail of proposed ground floor level signs including their height above ground level, whether fixed or free standing and relationship with other signage;	The proposed ground floor signage along the Alison Road elevation will consist of: ▪ Wall mounted steel lettering signage advertising 'Royal Randwick' set in front of a hedge ▪ Temporary 'Spring Carnival' signage mounted upon the proposed steel painted wall fronting Alison Road. Architectural plans attached as Appendix C demonstrate the scale and size of the proposed ground floor signage.
3	Further information regarding the historical significance of the following structures/features: ▪ further detail including a description and history of the second Stewards' Tower, proposed for removal. ▪ the existing path and associated planting adjacent to Alison Road.	Graham Brooks and Associates have prepared a Statement of Heritage Impact for the Response to Submissions (Appendix D). The following summarises the additional information. <u>Steward's Tower</u> The Steward's Tower is steel framed with steep dog-leg stairs leading to a small enclosed booth on the top level. Their walls and roof are clad with colorbond. The steward's tower was likely to have been erected at the same time the Kensington track was built in the 1960s. It is graded as having little heritage significance. <u>Path and planting adjacent to Alison Road</u> The existing paving and garden area at the rear of the Oaks Marquee, which has a circular focal point, dates from the 1980s. The landscape feature previously contained a memorial to Phar Lap. The memorial was removed from the site in mid-2011 to

ITEM	REQUIREMENT	RESPONSE
		facilitate vehicular access to this part of the site. This landscape feature is considered to be of little significance. The memorial is a movable heritage item of high significance. It is to be installed in a new location as part of the site interpretation required as a condition of consent for the development of the Spectator Precinct that is currently under construction.
4	Details of the proposed interpretation panels to the Turnstile building, including how they relate to the Godden Mackay Logan Conservation Management Plan, what information is to be displayed.	The Statement of Heritage Impact (Appendix D) states: <i>‘Godden Mackay Logan prepared the Royal Randwick Racecourse Interpretation Plan Phase 1 Strategic Overview report in 2009. Section 6.2 of this Interpretation Plan notes “The original function of the former Turnstile Building at Gate 6 could be interpreted through a trompe l’oeil painting scheme for the surviving elements of ticket windows, numbers and doors to visually interpret its original function.</i> <i>The interpretation panels proposed in this application are considered to be consistent with the overall strategy for the site. Details of the proposal, including the images to be displayed, are yet to be prepared. It is therefore recommended that the project approval include a condition of consent requiring this information be provided to the DPI before the issue of a Construction Certificate. ‘</i>
5	A Landscape Impact Statement prepared by a suitably qualified professional, assessing the historic significance of the site's previous and existing landscaping schemes.	The preparation of a Landscape Impact Statement is not considered necessary as the existing Draft Conservation Management Plan prepared by Godden Mackay Logan includes an analysis of the significance of the plantings and other landscape features within the racecourse site. The Draft CMP grades the site's landscape components as exceptional, high, moderate, little or intrusive. There are no landscape elements besides the Port Jackson Fig (L45) that have been identified in the Draft CMP as having notable heritage significance. The significance of the existing landscape schemes is addressed in further detail under Appendix D.

ITEM	REQUIREMENT	RESPONSE
6	A detailed parking strategy/ management plan is required providing information on how car parking related to the development will be managed on race-days and during other events at the hotel and across the site. The plan shall address parking demand in accordance with Randwick Council's Parking DCP and include details of any proposed signage, what events/occurrences will trigger the allocation of hotel resources to implement plan.	A detailed Parking and Traffic Management Plan is currently being prepared by the proponent. The provision of a Parking and Traffic Management Plan (PMP) would be best dealt with through a condition of consent requiring the PMP to be approved prior to the Occupation Certificate. Operational traffic management plans are currently developed for each major racing event and submitted to the NSW Police, Fire and Ambulance service and ATC Management. These plans include parking details and are working satisfactorily.
7	Details of the numbers of vehicles which will be using the new 'racecourse road', which continues south-west, past the hotel into racecourse land. This additional number of vehicles should be included in any traffic study.	The 'racecourse road' is not a new road. This access-way is already used for vehicle movements into the site on non-race and event days for deliveries to the racecourse site. It is proposed that this access-way be upgraded to improve access past the hotel. The existing traffic movements are not proposed to be increased.
8	Clarification is sought that alternative truck access across the site, required for major events on the Racecourse will remain secured.	A development application is currently being prepared in relation to the establishment of a new access to the in-field area via the intersection of Alison Rd and Cowper St. This new access will not be suitable for trucks due to height restrictions, however an alternative truck access is currently available via Gate 8, High Street.
9	The existing Randwick Racecourse Traffic Management Plan should be updated to include the proposed hotel development. This should be submitted and is likely to be to agreement by RMS and Council.	Refer to item 6 above.
10	Detailed modelling, certified by a suitably qualified professional, that all habitable floor levels, openings and entry/exit points (including basement carpark) are protected up to the 1%AER flood level, plus 500mm freeboard, shall be provided.	The proponent request that a condition of consent require that the flood modelling will be reconfirmed prior to the construction stage.
11	The in-ground stormwater drainage system shall be modified to be capable of discharging a 1 in 20 year storm flow. Pipes must have a minimum pipe size of 150mm in diameter.	This requirement is considered unnecessary as the proposed stormwater drainage system has been designed to the 10 year ARI but will surcharge for storms in excess of the capacity of the drainage system. Overland flow paths will safely convey any surcharge flows overland away from the building and basement entrance.

ITEM	REQUIREMENT	RESPONSE
		Therefore there is no material benefit in increasing the capacity of the in-ground drainage system to the 20-year ARI. On the contrary, it would reduce the opportunity for groundwater recharge (which can only occur from surface flows) which is an integral part of the stormwater management strategy for the Racecourse. The minimum in-ground pipe size is shown as 150mm diameter. (Refer Appendix J)
12	Confirmation of the following is requested: ▪ that the proposal complies with Randwick Council's on-site stormwater detention policy; and ▪ that all basement areas, including the lift over-run will be fully tanked systems.	<u>Stormwater Detention</u> The proposal will utilise the existing on-site detention and ground water recharge system. This is considered to be acceptable as the proposed hotel precinct results in a net reduction in impervious site area compared to the existing situation. (Appendix J) <u>Basement Areas</u> The proposal will meet the applicable standards for basement areas. Tanking will be provided up to a level which is 1m higher than the highest estimated water table level which itself included an allowance for water table fluctuation, in accordance with DPI recommendations for the Spectator Precinct. Tanking above this level is obviously unnecessary. As an additional "belts and braces" precaution, perimeter subsoil drainage will be provided at the top of the tanking level to equalise any local "perched" water table that might occur in the immediate proximity of the building. These are discussed in Section 6 of the Water Management Report that was submitted with the EIS. (Appendix J)

5 Proposed Modifications

5.1 DESIGN AMENDMENTS

The proponent considers that the design amendments contribute to providing an overall response to the site. The key design amendments include:

- Removal of roof top signage above the parapet and provision of a façade sign advertising 'Adina' at Level 7 of the façade fronting Alison Road.
- Relocation of 'Royal Randwick' rooftop signage at ground level as entry signage for the racecourse.
- The columns on the east and west ends of the proposed building have been moved inwards towards the central core of the building by 2.5m to increase the cantilever of the upper floors of the building.
- Stair cores within the undercroft space have been amended to incorporate a continuous surrounding steel mesh planter screen and steel fins to replicate the podium façade design.
- The soffit to hotel room undercroft has been developed to include a dynamic reflective metal cladding system, with the linear effect of expressed joints used to emphasise the interest in this space and catch reflections of passing movements.
- Improvements to the proposed traffic management operations on event days including the proposed new bus staging area within the busway along Anzac Parade/Centennial park to stable up to 13 buses prior to their entering the site from the proposed right hand turn from Alison Road, and removing the current arrangement of staging buses within Darley Road prior to their entry to the ATC bus layover.

The proponent has reviewed the key issues outlined by the DPI in their letter 17 September 2012. Section 6 of this report provides the proponent's response to each key issue in detail. Where the proponent does not propose any modification to the originally submitted proposal to address the DPI key issues, an appropriate response has been provided through the provision of additional information or outlining the design process to achieve the preferred design option.

A revised Design Statement prepared by Tonkin Zulaikha Greer Architects (TZG) is included at **Appendix E** and responds to the design issues outlined in the DPI Attachment 1 of their letter 17 September 2012.

5.2 TRAFFIC

The proponent believes the proposed arrangement represents a significant improvement for access to the site both for buses and private vehicles. The key changes to the proposed traffic and access arrangements can be summarised as follows:

- Improvements to the proposed traffic management operations on event days including the proposed new bus staging area within the busway along Anzac Parade/Centennial park to stable up to 13 buses prior to their entering the site from the proposed right hand turn from Alison Road, and removing the current arrangement of staging buses within Darley Road prior to their entry to the ATC bus layover. Management of bus movements will be by STA / ATC staff.
- On race-days it is proposed that an electronic 'No Right Turn – Buses Excepted' sign be illuminated to notify motorists of the changed traffic conditions. As such only buses will utilise the right hand turn off Alison Road into the site. Additional signs will be located further down Alison Road as an early warning to minimise confusion to motorists unfamiliar with the area.
- The proponent will investigate the potential to provide a pedestrian crossing on the western approach to the Alison and Darley Road intersection to maximise pedestrian safety.

- The proponent has provided additional information as outlined in Section 6.4 in respect of the proposed traffic intersection and hotel operations management in relation to traffic and access on event days.

5.3 OPERATIONAL DETAILS

- Intersection and hotel car park management operational procedures for event days and non-event days.
- Closure of port cochere and car park during race day / non-race day events.
- Addendum to the Royal Randwick Racecourse Functions and Events Management Plan specific to the operation of the proposed hotel, function centre and restaurant/bar facilities to include:
 - Patron capacity
 - Proposed trading hours
 - Amplification of music and PA
 - Onsite security and staff
 - Noise mitigation measures

An addendum statement to the Royal Randwick Racecourse Functions and Events Management Plan prepared by the Australian Turf Club is included at **Appendix F**.

6 Environmental Issues

This section addresses the key issues raised in the DPI letter in the context of the preferred design.

6.1 THE RESPONSE TO SUBMISSIONS

The proponents response to submissions and subsequent modified design seeks approval for:

- Partial Demolition of the Alison Road boundary fence; the brick toilet block adjacent to the Alison Road entrance; and the two stewards towers located against the racetrack.
- Removal of the Oaks Marquee temporary structure.
- Conserve and reuse the former Turnstile Building.
- Construction of a new eight storey building accommodating a hotel (170 rooms), bar, restaurant, ancillary conference facilities, and outdoor swimming pool.
- Construction of a single level of basement providing parking for up to 50 vehicles, bathrooms, storage and back of house ancillary spaces.
- Construction of new outdoor bar facilities at the western part of the development site adjacent to the Official's Stand.
- Landscaping and public domain works, including the construction of a concrete terrace behind the former Turnstile Building, and the removal of two trees.
- Business identification signage for the hotel building and site gateway signage for the Royal Randwick Racecourse.

The key numeric aspects of the modified design for which approval is sought are detailed in Table 1 of this report.

6.2 BULK AND SCALE

The proponent has considered the key issues outlined by the DPI in their letter 17 September 2012. The proponent is of the opinion that the proposal is the appropriate built form and design response for the site, but nevertheless has undertaken some important design modifications to refine the proposal.

This section addresses the issues raised by the DPI regarding the proposed built form and its relationship with the public realm and surrounding development. It demonstrates that there has been a significant level of design analysis that has resulted in an appropriate response to the site and location. It is noted that the DPI urban design review of the EIS scheme was generally positive and the key points from the urban design review are referred to below:

The DPI letter raised the following issues:

- *appropriate response to the general site context, including predominant building forms and height.*
- *relationship with Alison Road.*
- *opportunities to reflect the curved nature of the track at the upper levels.*
- *opportunities to relocate / reduce rooftop plant.*
- *study of alternative building options that investigate opportunities to retain the significant trees.*
- *Design to should be reconsidered to better achieve a landmark building reflecting the cultural and historic significance of the RRR.*

6.2.1 ASSESSMENT OF ALTERNATIVE BUILDING OPTIONS

During the design development of the proposal three built form and design options were considered and are detailed in the revised Design Statement prepared by Tonkin Zulaikha Greer Architects as included at **Appendix E**.

The site is located at the end of the racetrack and provides an interface between the RRR and the public domain along Alison Road. As stated in the DPI urban design review:

‘The Alison Road context is not highly sensitive and is a mix of development from a range of eras of varying quality. The eclectic nature of this context, combined with the busy road, is such that it has a high capacity for visual absorption of additional development.’

Each of the 3 design option gave consideration to the context of the site and to ensuring the most appropriate design response through considering the following:

- The heritage vistas and views to the Royal Randwick Racecourse site from Alison Road and Darley Road and the heritage context of the site.
- The landscape and open settings of the site and the relationship of the site to a major arterial road (Alison Road)
- The surrounding built form within the racecourse site and along the surrounding streetscape of Alison Road.
- The existing overland flood flow path.

Section 1.5 of Appendix E outlines the three built form design options and sets the proposal in the context of it being the most appropriate design solution for the site in terms of bulk and massing. Option 3 is the proponents preferred proposal.

6.2.1.1 THE RESPONSE TO SUBMISSIONS MODIFIED DESIGN OPTION – OPTION 3

Option 3 is considered the most appropriate design and context response for the site. The benefits of Option 3 over Option 1 and 2 as identified by TZG Architects includes:

- *The hotel room form is the most efficient layout and therefore the smallest volume conceivable in order to achieve the commercial imperatives of the hotel. (TZG)*
- *The landscaped setting and open ground plane of the hotel continues the tradition of Royal Randwick buildings within connected landscaped settings. (TZG)*
- *The elevated hotel form of Option 3 allows the heritage turnstile building to maintain an independent identity and keep a sky back drop. (TZG)*
- *The open undercroft, elevated hotel room form and transparent nature of the lower form maximises and improves on the views into the Royal Randwick Racecourse precinct from the identified Historical View Points from Alison Road and Darley Road. (TZG).*
- *Option 3 has a similar scale and foot print, and relationship to the track as the adjoining official stand.*
- *Maintaining the heritage views into the racecourse through raising the upper floors of the hotel 14m above ground (at the underside of Level 3) to allow visual connection to towards the officials stand and viewing away from the officials stand through the hotel footprint.*
- *Reduced scale and bulk at street level resulting in the provision of a greater hard and soft landscaped area at ground level.*

- *The perceived predominant building form and height of the proposal is reduced through the provision of cantilevered upper floors that reduce the impact of the proposal at street level and the overall visual impact of the proposal within the streetscape.*
- *The overall bulk, massing and perceived height of the proposal is reduced in Option 3 compared to Options 1 and 2 through the provision of raised upper floors from level 3-7, and the provision of a greater setback of the upper floors from Alison Road.*
- *Option 3 provides a reduced overall floor area than Option 1 and 2 resulting in a reduced scale, bulk and massing of the response to submissions design option.*
- *Limited back of house items are visible from Alison Road and where they are present they are suitably disguised in colour back glass consistent with the language of the lower form. The service loading dock is completely hidden from public view below the ground level.*
- *The lower building is a highly transparent glass volume and maintains a strong connection to the northerly aspect allowing views and light in and out, and through this space.*
- *The Spectator Precinct entrance has recently been refurbished to be a predominantly open space that facilitates the movement of large crowds in and out of the site. When viewed in the context of the approved development of the Spectator Precinct that is currently under construction it is unlikely that the entrance will be dominated by the proposed Option 3 hotel building.*

TZG has designed the roof plant area as a sculptural counterpoint to the form of the building below. The length and setback of the space enclosed has been kept to the minimum required to capture the necessary roof access stairs as well as the bulk of the bathroom exhaust fans in order to present as tidy a roof form as possible when the building is viewed from a distance. Further reduction of the enclosed plant area and height will be explored as plant selection is confirmed through the documentation phase of the project.

6.3 URBAN DESIGN

The proposed design Option 3 as detailed in Section 6.2.1 and as further detailed in the attached architectural plans at **Appendix C** is the proponents preferred concept. Section 6.2.1.1 has identified the merits of this concept in respect of building massing and its relationship to the sites constraints and context. The following outlines that the proposal is the most appropriate response in relation to the proposed height, bulk and scale of the modified design concept.

The preferred concept has considered alternative Options for the proposed scale, bulk and height of the proposal in the context of its location and with the surrounding development and streetscape.

The DPIs requirements identified that the proponent should further address building forms and heights as part of this response. The issues raised by the DPI in their letter 17 September 2012 are outlined below, and the proponent's responses to these issues are also outlined below.

The DPI raised the following issues:

- *Achieving a 'landmark building' reflecting the cultural and historic significance of the RRR and the contextual setting of the building.*
- *Relationship of the building with Alison Road.*
- *Impacts of the perceived bulk and scale when viewed from surrounding areas.*
- *Provision of attractive frontages and articulation.*
- *Appropriateness of the external facade in terms of achieving a design appropriate for a landmark building.*
- *Appropriateness of the exposed support columns, fire escape, and underside of upper levels.*

- *Appropriateness of proposed use of a curtain wall with a printed imagery interlay façade.*
- *Appropriateness of proposed external façade treatment in terms of internal comfort for guests.*
- *Opportunities to reduce visual impacts through the redistribution of building mass.*
- *Success of the proposal in terms of retaining views across the site.*
- *Location of back of house and building services in relation to Alison Road.*
- *Provision of attractive frontages and articulation.*
- *Appropriateness of the external facade in terms of achieving a design appropriate for a landmark building.*
- *Appropriateness of the exposed support columns, fire escape, and underside of upper levels.*
- *Appropriateness of proposed use of a curtain wall with a printed imagery interlay façade.*
- *Appropriateness of proposed external façade treatment in terms of internal comfort for guests.*

6.3.1 SITE CONTEXT

There are no height controls over the site. The bulk and scale of the proposed hotel is considered to be suitable in the context of the surrounding development with no detrimental impacts on the amenity of surrounding occupiers.

As identified by the DPI Urban Design review ‘the proposed development is taller than the heritage listed Officials Stand and similar in height to the new stand under construction on the other side of the Officials Stand. Its height is similar in magnitude to newer adjacent development and will provide a satisfactory built edge to the Alison Road frontage. Its alignment will continue the faceted alignment of stands with the track’.

The overall bulk and scale of the proposal and its context with the surrounding area and streetscape is considered an appropriate design response to the site and an improvement upon the existing mixture of temporary and permanent structures at the interface with Alison Road and RRR.

The proposed height of the building in the context of Alison Road and its existing built form would not create a detrimental impact on the scale of the development when viewed in relationship with the existing RRR buildings and grandstands. This is further supported by the DPI Urban Design review that identifies that:

‘The Alison Road context of the proposed building is not highly sensitive and is a mix of development from a range of eras and of varying quality. The eclectic nature of this context, combined with the busy road, is such that it has a high capacity for visual absorption of additional development. The smaller footprint of the podium structure reduces the bulk of the building and will open up views from Alison Road to the track, currently blocked by temporary marquee structures’.

The proposed new building in the context of Alison Road is appropriate as referenced in **Appendix E** (TZG Architectural Design Statement). The design statement considers that the proposal is appropriate for the following:

The proposed hotel is located on a triangular piece of land between the Racetrack, the Spectator Precinct and Alison Road.

As there are no specific height controls the bulk and scale of the proposed building is relative to the Officials Stand, the new Grandstand and other surrounding buildings such as the adjacent TAFE building.

No overshadowing occurs to surrounding proper ties as all shadows fall onto the Racetrack.

The proportion of the massing of the building has been determined so that it sits comfortably with the existing Officials Stand and the new Grandstand currently under construction.

Along the trackside the Hotel takes on the guise of a grandstand, its terrace stepping down to the track. Facing the track, the hotel room wing has an interesting articulation with setdown balconies. The ends of the hotel wing have been shaped to formally integrate with the site.

The Statement of Heritage Impact submitted with the original EIS application also supports the proposed scale and bulk of the building and notes the following:

'Although the new addition will be a new landmark element at the Alison Road frontage of the RRR site, it will not visually dominate the Racecourse Precinct Heritage Conservation Area given the extensive size and largely open nature of the conservation area and the varied development within it. It is considered to be a sympathetic addition to the Racecourse Conservation Area as it incorporates an area of the Spectator Precinct that currently has very limited use into the functionality of the Spectator Precinct, and activates the space adjacent to the former Turnstile Building, enhancing opportunities to appreciate the significance and function of this building.'

In summary the proposed scale, bulk and height of the proposed concept is appropriate to the streetscape and the context of the surrounding area. The proposal will result in a landmark building of contemporary design set within the racecourse precinct.

6.3.2 VISUAL IMPACTS

As identified in the previously submitted EIS the proposed visual impact of the proposal has been considered against the significant views identified in the Royal Randwick Racecourse DCP, the Draft Godden MacKay Logan Conservation Management Plan and the existing heritage views into the site from Darley Road and Alison Road.

- The proposed building represents an improvement over the mix of temporary and permanent structures that currently exist on the subject site, and the Alison Road interface with the site.
- The open undercroft, elevated hotel room form and transparent nature of the lower form maximises and improves on the views into the Royal Randwick Racecourse precinct from the identified historical viewpoints.
- The views into the site are considered to be improved from present view corridors, as corridor widths are increased through the raised cantilevered building tower.
- The identified heritage view corridors actively informed the design and shaping of the building forms. The Statement of Heritage Impact (SoHI), submitted with the original EIS application includes an analysis of the Historic Views identified in the RRR DCP 2007. The view analysis demonstrates that the new development has been sited and designed so it will not obstruct views to and from the adjacent Official / Members Stand, or important historic views within and to the racecourse. A view analysis was provided in the Heritage Impact Statement submitted with the original EIS.
- The proponent considers that the proposal will retain the existing views across the racecourse and the proposed design response is the most effective way to ensure these views are retained through minimising massing and bulk at street level.
- It is noted that the DPI Urban Design review recognised that the *'proposed smaller footprint of the podium structure reduces the bulk of the building and will open up views from Alison Road to the track, currently blocked by temporary marquee structure'*.

- The DPI Urban Design review also identified that the *‘view corridors down Darley Road are confined by the downward slope and by large fig trees on either side of the road. The impact of this view by the proposed development is therefore limited’*.
- Limited back of house items are visible from Alison Road and where they are present they are suitably disguised in colour back glass consistent with the language of the lower form. The service loading dock is completely hidden from public view below the ground level.

The proponent has made some minor modifications to the originally submitted concept plan that form part of the preferred project application. These changes will contribute to further enhancing the views into the site. These modifications include:

- Columns at both the eastern and western ends of the building have been moved in 2.5m in order to increase the interest and elegance of the cantilever form. This modification will also have the benefit of opening up the views into the site on the eastern and western ends of the proposed building.
- Stair cores within the undercroft space have been addressed through the incorporation of a continuous surrounding steel mesh planter screen and steel fins in order to improve the overall visual impact of the proposal at street level.
- The soffit to the hotel room undercroft has been developed to include a dynamic reflective metal cladding system, with the linear effect of expressed joints used to emphasise the visual interest in this space and catch reflections of passing movements.

In summary the proponents proposed modifications and the overall design response to the site have ensured that the proposal does not result in any significant visual impacts and that the proposed contemporary design maintains views and view corridors into the site.

6.3.3 EXTERNAL FAÇADE AND DESIGN QUALITY

The submitted EIS addressed the design quality of the proposed building, in particular the external design quality of the facade. In summary the EIS proposed a contemporary design in terms of its bulk and massing as well as its material palette for the following:

- The podium is sheathed in steel vertical glazing fins and glass infill, extending past the roof to make a continuous balcony for the Level 2 roof terrace. The proposed vertical glazing fins and glass infills contribute to overall variation to the façade treatment.
- The “glazed wrap” wall to the Alison Road side of the hotel wing is a flush laminated curtain wall, with a durable pattern printed on the interlayer, containing abstracted equine imagery. Predominantly blue and green in colour, the facade is melded in with the parkland setting.
- In terms of the services, the plant room is integrated into the overall design and compliments the overall composition of the building. The connecting fire stair structures are conceived as green walls, clad in mesh for vines to grow over, vertically extending the landscape.
- The hotel accommodation wing has balconies overlooking Royal Randwick, maximising the connection to the track, with a “glazed wrap” to the Alison Road frontage, offering views to the Centennial Parklands, whilst minimising the continual street noise and grime.
- Along the trackside the Hotel takes on the guise of a grandstand, with its outdoor terraces stepping down to the track, facing the track. The hotel room wing has an interesting articulation with setdown balconies. The ends of the hotel wing have been shaped to formally integrate with the site.

In response to the comments received in relation to the façade design quality, the proponent proposes the following:

- The facade creatively interprets the context and history of the Royal Randwick Racecourse Precinct.
- Detailed design and studies have been completed in order to create a timeless and distinctive façade; this work includes consultation with specialist Facade Consultants.

- Racecourse imagery is entirely appropriate for the location and the function of the wider RRR site. The imagery reflects the use which has been operating since 1833.
- Qualitative studies of the facade have included: presentation of the image, abstracting the pattern, pattern arrangements, colour options and concentrations, window panel heights, pixel arrangements and opacity. The proposed imagery and façade treatment is considered the best option.
- The facade is a result of detailed studies including the JV3 model process provided by WSP environmental engineers and detailing provided by AECOM facade engineers.
- The facade is a long-life, durable and practical solution easily cleaned which is necessary for a building adjacent to a busy six lane road. The Facade is easily serviced and cleaned from continuous roof top based gantries.
- Any additional layers of metal screens and horizontal glass shading structures will quickly become a housing for dust and dirt derived from the busy adjoining Alison Road, and also significantly inhibit cleaning of the facade behind.
- The facade is considered a state of the art system that significantly contributes to creating an iconic landmark building through its contemporary treatment and proximity to Alison Road and Darley Road.

The previously lodged EIS façade treatment has been modified to address some of the comments received in respect of building façade design quality. These modifications include:

- Stair cores within the undercroft space have been addressed through the incorporation of a continuous surrounding steel mesh planter screen and steel fins in order to improve the overall visual impact of the proposal at street level.
- Soffit to hotel room undercroft has been developed to include a dynamic reflective metal cladding system, with the linear effect of expressed joints used to emphasise the visual interest in this space and catch reflections of passing movements.

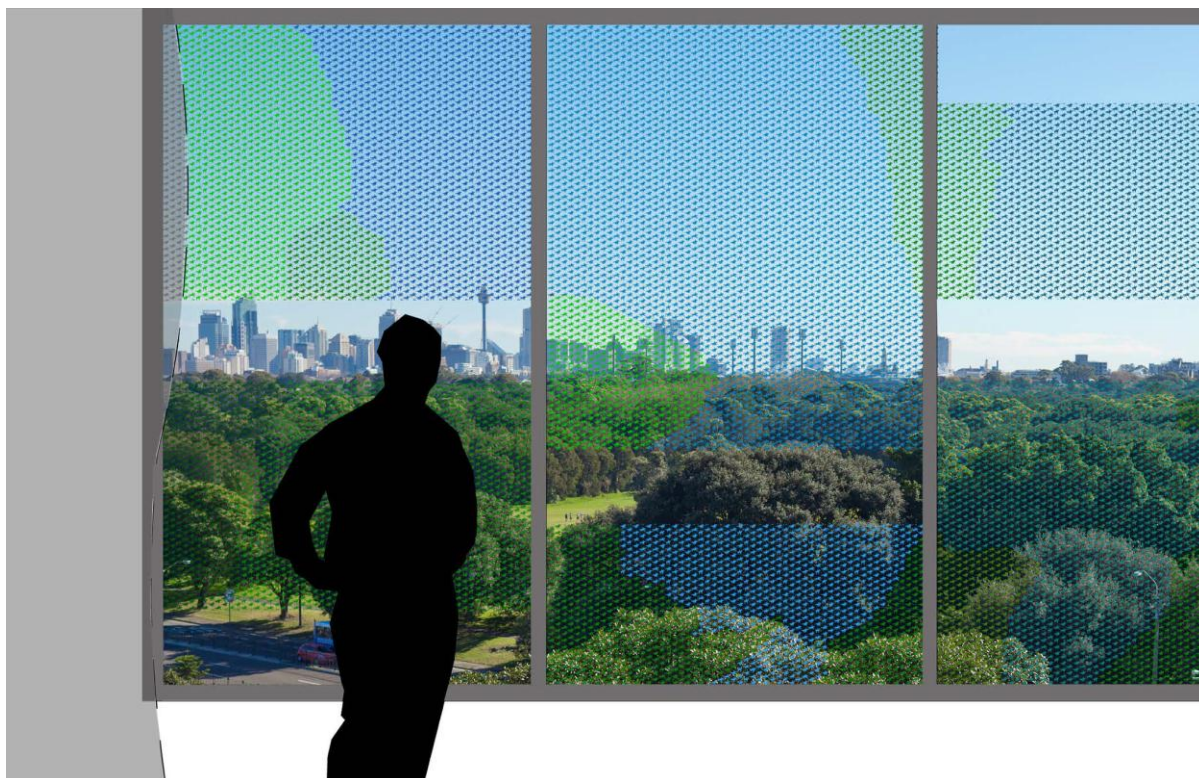
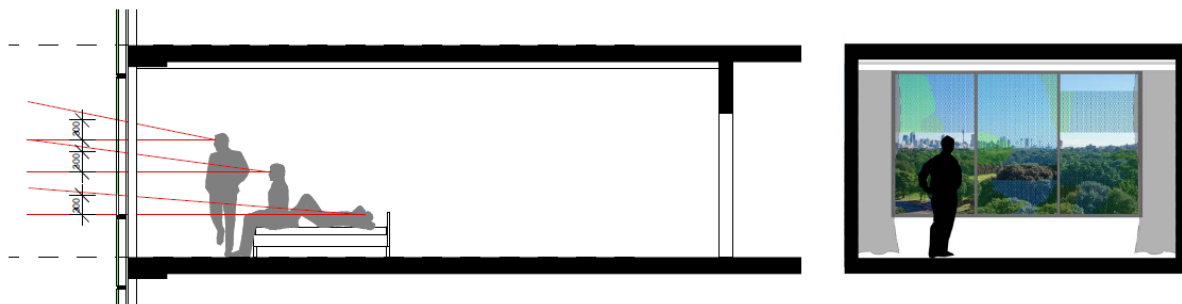
See **Appendix C** for images of the revised façade design.

In response to concerns raised in respect of internal comfort for guests, the proponent provides the following response in relation to perceived visual outlook to the north of the site:

- In relation to the view experienced by hotel guests when looking north, the façade design proposes that portions of the coloured pixels shall be removed from the hotel room window so that at all 3 viewing positions (lying, sitting and standing) there is some section of clear glass and views to the park. **(Figure 4)**
- The proposed removal of these pixels incorporated within the abstract imagery will not detract from the overall external appearance or design quality of the proposed north facing façade.
- The lower building is a highly transparent glass volume and maintains a strong connection to the northerly aspect allowing views and light in and out, and through this space.
- The hotel entry is a highly visible 2 storey volume opening out to Alison Road providing expansive views through the building to the track beyond.

Figure 1 demonstrates the removal of pixels and how it achieves clear visibility from the inside to the external surrounds.

FIGURE 1 – INTERNAL COMFORT – VISUAL OUTLOOK



PICTURE 1 – INTERNAL COMFORT – VISUAL OUTLOOK

6.3.3.1 THERMAL COMFORT

The DPI raised the following issues in respect of the appropriateness of the proposed external façade treatment in terms of the achievement of internal comfort for guests.

WSP Environmental have provided additional information (**Appendix G**) demonstrating that the proposal achieves best practice design for the provision of thermal comfort for guests.

Additional assessment of thermal comfort for the proposed hotel rooms has been undertaken by the proponent. The results of this assessment are included in the submission prepared by WSP Environmental. The proposed levels of thermal comfort achieved for the RRR hotel rate highly and are summarised as follows:

- It can be seen that a PMV performance of ± 1.0 is achieved for 100% of the occupied year. Further, a PMV performance of ± 0.5 is achieved for 99% of the occupied year. This demonstrates a best practice design for the RRR Hotel.

- The RRR Hotel's dominant façades are north and south facing. For the north façade, consideration was given to both external shading and enhanced glazing solutions. It was found that an enhanced solar control glazing solution provided the performance necessary to meet the requirements of Part J2 Glazing of Section J Energy Efficiency of the National Construction Code (NCC) 2012 and align with a best practice thermal comfort performance.

The ability to offset the requirement for external shading means that the architectural intent of the highly visible Alison Road façade is not compromised. It also supports reduced maintenance and cleaning requirements for the north façade; improving the life cycle costs of the building envelope design.

- The treatment to the south façade consists of an enhanced thermal insulation glazing solution that effectively mitigates heat loss from the south facing hotel/hospitality bedrooms and living areas. The glazing specification ensures cold draughts are minimised and occupant comfort is maximised.

Figures 2 demonstrate the daylight penetration to the north facing hotel bedrooms and living areas. It can be seen that good daylight penetration levels are received in the winter months whilst nominal daylight penetration levels are received in the summer months. The levels indicated represent good conditions for thermal comfort.

FIGURE 2 – DAYLIGHT PENETRATION TO NORTH FACING (WSP)

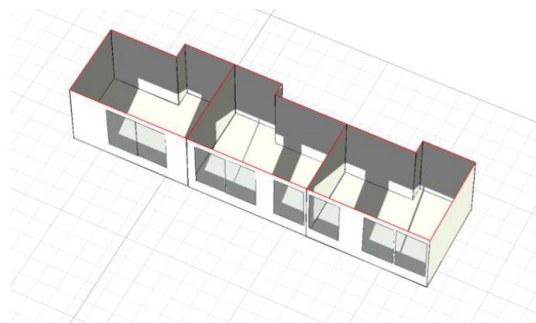


Figure 3: Winter daylight penetration

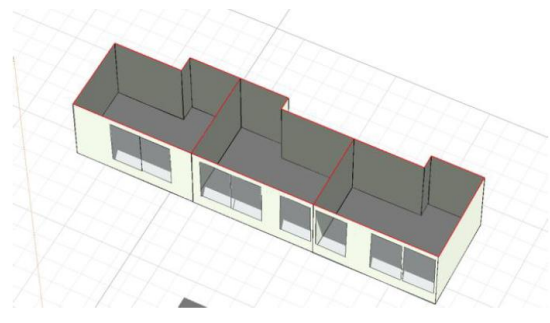


Figure 4: Summer daylight penetration

6.4 SIGNAGE

The DPI letter raised the following issues:

- *The roof signs are not consistent with the objectives of the Randwick Outdoor Advertising DCP.*
- *Consider incorporating in the building façade and using sympathetic size, design, colours and illumination, compatible with the site's status as a Conservation Area.*
- *Assessment of the proposed signage against the relevant sections of the NSW Heritage Branch publication 'Statements of Heritage Impact' should be provided.*

6.4.1 ROOF SIGNAGE AND FAÇADE SIGNAGE

The modified proposal in response to submissions has amended the location of the hotel signage and proposes the following:

- Removal of roof top signage above the parapet and provision of a façade sign advertising 'Adina' at Level 7 of the façade fronting Alison Road.
- Relocation of 'Royal Randwick' rooftop signage at ground level as entry signage for the racecourse.

These amendments are considered to address the issues that were raised by the DPI for the following reasons:

- The proposed signage is incorporated into the building façade, which significantly reduces the perceived bulk and scale of the built form of the proposal when viewed from Alison Road and from within the RRR.
- The location of the Royal Randwick gateway sign at street level provides a suitable entry to the site which is compatible with street level signage that currently exists whilst not creating a visual distraction to passing traffic or pedestrians.
- The proposed entry signage will create an additional presence along Alison Road and will not impact on the site's overall character and appearance of the streetscape or heritage significance.
- The impact of the illumination will be reduced as the Adina signage is now incorporated into the building façade. The proposed illuminated signage is not likely to impact on any surrounding residential occupiers.

It is noted that development control plans are not a relevant matter for consideration when assessing State Significant Development, however, the proposed signage modifications consistency with the relevant objectives of the Randwick Outdoor Advertising DCP is demonstrated in Table 5 below.

TABLE 5 – RANDWICK OUTDOOR ADVERTISING DCP OBJECTIVES

RELEVANT OBJECTIVE	COMMENT	CONSISTENCY
<i>Allow for appropriate promotional and directional advertising to identify both public and private recreation facilities</i>	The proposed signage is considered to be an appropriate mechanism in order to identify a hotel adjacent to a heavily trafficked major road. The signage is an appropriate scale and type to allow patrons to identify the location of the hotel and make the necessary traffic manoeuvres to access the site.	Yes
<i>Minimise the visual impact of outdoor advertising</i>	The visual impact of the amended signage is a considerable reduction to the signage proposed in the EIS proposal. The scale and location of the proposed signage will not dominate the surrounding open space area or streetscape and is considered to be an appropriate signage solution for the interface between the open space and urban setting.	Yes

The proposed signage is considered to be compatible with the site's status as a Conservation Area and the heritage impacts are discussed under 6.4.2 below.

6.4.2 HERITAGE IMPACTS OF THE PROPOSED SIGNAGE

Graham Brooks and Associates have undertaken an assessment of the proposed signage against relevant sections of the NSW Heritage Office's (now Branch) publication 'Statements of Heritage Impact'. This assessment is attached as **Appendix D**, and the key issues are summarised below.

- The impact of the new signage on the heritage significance of the Racecourse Precinct Heritage Conservation Area has been minimised by separating the 'Royal Randwick' site identification sign, and the 'Adina' hotel sign. This reinforces the primary importance of the racecourse site.
- The proposed signage is consistent with the objectives of Section 6, 'Areas of Heritage Significance', in *Outdoor Advertising: An Urban Design-Based Approach*.

- The proposed signage is for a new built element of contemporary design and internal illumination is considered to be acceptable.
- The proposed signage is an integral part of the building and will not visually dominate the Racecourse Heritage Precinct Conservation Area, or the adjacent Official / Members Stand (refer to Figure 3).

FIGURE 3 – LOCATION OF THE PROPOSED SIGNAGE (RED STRIPE) AS VIEWED FROM THE INFIELD



6.4.3 REFLECTIVITY

The DPI letter raised the following issues in respect of reflectivity:

- *Address the solar reflectivity statement which concludes that there will be unacceptable glare to drivers on Alison Road and potentially Darley Road.*

Proponents response

The Solar Reflection Analysis report dated 21 May 2012 and submitted with the EIS identified areas of the glazed façade which could result in levels of reflected solar glare exceeding applicable standards towards motorists at certain times of the year.

It is proposed that the design and specifications of the curtain wall façade will ensure that the specular external reflectivity of the glass is 17% or less in the relevant areas. To meet this requirement the proponent will undertake specialist spectral analysis of glass samples. These glass samples will be representative of the actual glass that will be used for the building. Glass will only be selected for the project where it is demonstrated to comply with the above criteria.

The proponent will ensure that any alternative glass options proposed by the façade installer are also tested and shown to meet the contract requirements and thereby ensure that they have an acceptable external reflectivity.

Attached at **Appendix H** of this report is the technical response prepared by AECOM on behalf of the proponent in response to this issue.

In summary, the proposed curtain wall façade will not create an unacceptable level of solar glare to motorists on Alison Road.

6.5 TRAFFIC, ACCESS AND PARKING

Further assessment of the traffic, access and parking implications of the proposed development has been undertaken by Parking and Traffic Consultants (PTC) and is included at **Appendix I**. This assessment has been undertaken in response to the following key issues raised by the DPI in relation to the EIS:

- *Right hand turn lane from Alison Road into the site and consideration of potential alternative access arrangements.*
- *Access arrangements and operational traffic management.*
- *Location of driveways, Porte Cochere and proximity to Alison Road.*
- *On-site parking and capacity to accommodate overflow parking.*
- *Alternative loading dock arrangements.*
- *Inclusion of pedestrian facilities across Alison Road west of Darley Road.*

It is essential to outline the background traffic issues in order to understand the proponents response to the proposed traffic and access arrangements.

6.5.1 BACKGROUND TO TRAFFIC AND ACCESS ARRANGEMENTS

The existing traffic and access arrangement for major events is outlined below:

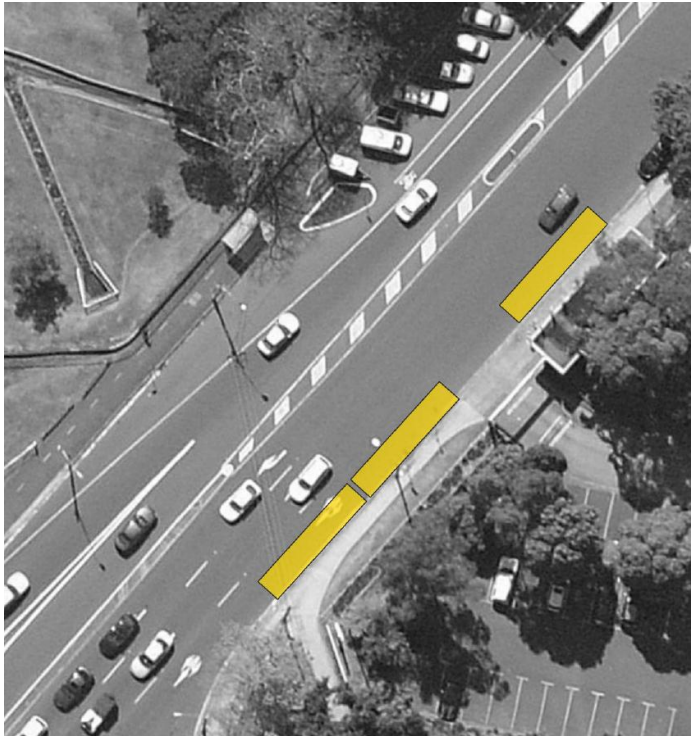
- Buses arriving from the west are required to pass through the Alison and Darley Road intersection twice in order to enter the RRR busway. This movement is inefficient and dangerous for motorists, pedestrians and buses on race days and creates additional stress to the Centennial Park roundabout. This movement is illustrated in Figure 4.

FIGURE 4 – EXISTING WESTERN BUS ACCESS TO THE RRR



- Darley Road currently provides stabling facilities for up to three buses (refer to Figure 5) at any given time prior to receiving patrons leaving the RRR.

FIGURE 5 – EXISTING DARLEY ROAD STABLING ARRANGEMENT



- SIDRA Modelling of the current traffic demand has been completed. These arrangements have the following negative impacts on the surrounding road network:
 - Increased congestion along Darley Road decreasing the capacity of the road to accommodate through traffic and vehicles accessing Centennial Park.
 - Reduced capacity for patron set-down areas along the western side of Darley Road.
 - Reduced visibility for the high volumes of pedestrians and motorists that are navigating through the area.

The key issues raised in the DPI letter are discussed below.

6.5.2 RIGHT TURN FROM ALISON ROAD AND ALTERNATIVE ACCESS

The proposed right hand turn from Alison Road into the site remains an integral part of the development proposal and a critical commercial requirement for the hotel operator. The assessment undertaken by Parking and Traffic Consultants concluded that the intersection at Alison and Darley Roads has the capacity to accommodate the right hand turn and it will not have a negative impact on the surrounding road network and bus operations. The key matters for consideration are outlined below:

- *The proposed access arrangement involves amendments to the existing intersection of Alison Road and Darley Road, which is a traffic signal controlled intersection. The amendments include the provision of the right turn movement and queuing lane for vehicles entering the hotel from the west/City, and the inclusion of an egress lane on the fourth approach to the intersection to allow egress from the Racecourse and Hotel. As stated within the Parking and Traffic assessment in the EIS Application, the above works are proposed to be accommodated within the existing road dimensions, negating the need for major construction works and delays to road users. The hotel site is surrounded by the Bus-Way access road, Alison Road and the race track, resulting in the triangular shaped site. During the design process a number of access options were assessed prior to establishing that the proposed access arrangement provides the most suitable solution.*

- *In conjunction with the traffic assessment submitted with the Development Application, a SIDRA analysis was prepared in order to determine the operation of the intersection before and after the hotel development. The modelling confirms that the 95th percentile queue for the site access right turn was 0.7 vehicles during the morning peak and 0.5 vehicles during the evening peak, indicating the proposed right turn lane length of 25 metres (excluding taper). The length of the right turn lane is sufficient to accommodate the queuing expected during normal operation, and will accommodate two 12.5 metre long buses when in use on major event / race days. We have prepared microsimulation modelling, which demonstrates that no more than two buses arrived at one time over the period of the modelling. This was based on the peak bus volume (29 buses in 1 hour) superimposed over the peak traffic volumes associated with the Epsom Super Saturday. To provide a sensitivity test, we then doubled the number of buses, which indicates that up to 58 buses per hour can arrive via the intersection with no more than 2 buses being queued.*
- *The management of bus arrivals is also an important aspect of the proposed arrangement, which is discussed in detail further below.*

The proposed amendments to the intersection directly address two matters which are of high importance to the ATC:

- *Effective and safe access for buses utilising the busway. This includes maximising pedestrian safety in the surrounding streets, particularly Darley Road; and*
- *Convenient and safe access for hotel guests, who are being dropped off or utilising the available basement parking spaces.*

*Swept paths are shown at **Appendix I**, demonstrating that all movements can be undertaken by the appropriate vehicles, including a 12.5 metre bus performing the right turn into the busway and the right turn from Darley Road by a bus in the outside lane, along with two cars in the inside lanes. It is important to note that during race and event days, vehicles will not be permitted to egress via the intersection. During non-race / event days all vehicles parked within the busway will egress via the western exit driveway, as at present.*

On race and event days it is proposed that the 'racecourse road' be a pedestrian only zone west of the access to the busway. A gate and/or bollards will prevent vehicular access during this time. In the event access is required by emergency vehicles, these movements will be managed by on-site staff in line with current arrangements. Traffic modelling has excluded race and event days for racecourse road as a result of the above mentioned arrangements.

6.5.2.1 ALTERNATIVE ACCESS ARRANGEMENTS

Access locations to the hotel site were investigated in detail during the design process, including to the east of the Alison Road intersection. This location was dismissed as an option for 3 reasons as outlined by PTC:

- *The proximity to the intersection of Alison and Darley Road is not considered suitable particularly for vehicles leaving the hotel and turning right to Darley Road. It would create danger and confusion for motorists.*
- *Due to the limited space between Alison Road and the Racecourse itself, the ability to construct a slip-lane for vehicles to slow down prior to entry into the site is restricted.*
- *The distance between the racecourse and the road was insufficient to construct a suitable basement ramp and porte cochere arrangement.*
- *Further, the site is located in a flood prone area, so all basement ramps were required to be raised to a suitable level prior to sloping downwards, creating additional difficulties when determining the location, length and design of basement ramps and the porte cochere. See Appendix U of the EIS Application for full details of the extent of flooding on the site.*
- *The proposed solution provides the most efficient and safest entry and egress to and from the site for buses, motorists and pedestrians via the existing traffic signals and road infrastructure.*

6.5.3 ACCESS AND LOADING

The following section addresses the key access and loading issues raised by the DPI.

Shared use of the RRR accessway / busway access and egress

The proponents response prepared by Parking and Traffic Consultants and included at **Appendix I** includes:

- *At anytime when the Bus-Way is in use by STA buses, entry by private vehicles and taxis from Alison Road will be prohibited, in line with current management protocol on major race and event days. ATC and/or NSW*
- *Police will be present on site to manage pedestrian movements as well as prevent private vehicles entering the site. This arrangement is currently managed effectively to prevent unauthorised entry, and this will continue under the proposed arrangement.*
- *On race-days it is proposed that an electronic 'No Right Turn – Buses Excepted' sign be illuminated to notify motorists of the changed traffic conditions. As such only buses will utilise the right hand turn off Alison Road into the site. To minimise confusion additional early warning signs will be located further down Alison Road for motorists not familiar with the area.*
- *Egress from the hotel on event days will be limited to the cars already parked in the car park. Hotel guests staying over periods when this arrangement is operational will be advised upon booking of the traffic restriction to minimise confusion upon their arrival. There will be no re-entering the basement during events.*
- *Peak hotel occupancy is anticipated to coincide with major events and it is anticipated that the majority of hotel guests will check-in to the hotel prior to the event commencing, with minimal check-outs until the following morning.*
- *Finally, the proposed hotel site has always been considered by both the ATC and Randwick City Council as a future development site, earmarked to provide member and corporate facilities as detailed within the Royal Randwick Racecourse DCP 2007.*

Hotel driveway and Port Cochere and Proximity to Alison Road

The proponents response prepared by Parking and Traffic Consultants and included at **Appendix I** includes:

- *The hotel site is surrounded by the Bus-Way access road, Alison Road and the race track, resulting in the triangular shape. During the design process a number of access options were assessed prior to establishing that the proposed access arrangement provides the most suitable solution. The porte cochere is accommodated within a small area, while providing a suitable number of set-down spaces. Additionally, a provision is made to include a continuous bypass lane, the car park access ramps and loading area. In this regard, it is not possible to locate the porte cochere access further from the intersection. See the response to Item 1 above for further information. During the meeting with RMS the provision of removable bollards was discussed, which would prevent pedestrian access along the southern side of the access road beyond the porte cochere. The bollards would be removed during events as the use of the porte cochere and basement driveways will be minimal (only the egress movement from the car park will be permitted). It was also suggested that the stairs shown along the eastern edge of the porte cochere entry ramp should be removed to discourage the set-down of passengers in this location.*

Loading

The proponents response prepared by Parking and Traffic Consultants and included at **Appendix I** includes:

- *The proposed loading dock location is considered suitable given the site constraints previously mentioned in this report. Further, it was part of the brief provided by the ATC that the loading dock be moved underground so as to not locate it adjacent to the racecourse or Alison Road. This was further supported by comments from the Department of Plannings Urban Design division, which suggested there were already excessive back of house elements facing Alison Road. It is the opinion of PTC and the ATC that locating the loading dock elsewhere would result in a detrimental architectural and urban design outcome.*
- *Signage, lighting and mirrors shall be implemented to provide adequate visibility and information for both passenger and delivery vehicles to safely utilise the basement ramp and loading dock.*

Swept path analysis for loading turning paths are included at **Appendix I**.

New Racecourse Road

The proponents response prepared by Parking and Traffic Consultants and is included at **Appendix I** includes:

- *The Shared Access road which moves south of the hotel site is an upgrade of the existing bitumen area located behind the officials stand.*
- *This accessway is already used for vehicle movements into the site on non-race and event days for deliveries to the racecourse site. It is proposed that this accessway be upgraded to improve access past the hotel and create a more defined path for vehicles to travel behind the grandstands. Further, parts of the grandstand are proposed to be operational on non-racedays - restaurants etc . The shared access road will facilitate access for users of the grandstands. Parking for these uses will be provided to the rear of the grandstand.*
- *During recent discussions with RMS, the potential to install removable bollards was raised in order to prevent pedestrians walking through the shared access area during non-event days, i.e. primary access will be for the hotel only. This provision would reduce the number of conflicting movement in and around the car park access area.*

6.5.3.1 PARKING

The key parking issues raised by the DPI included:

- *Concern in relation to the variation between the proposed parking and the RCC DCP parking rates.*
- *Further clarification on how overflow parking will be achieved on the Racecourse site when these areas are likely to be at capacity.*

The proposed number of basement parking spaces is considered to be acceptable based on average hotel occupancy rates and the forecast corporate guest profile of the hotel. This number has been informed by Toga - the proposed hotel operator.

On race days, overflow parking for the hotel will be accommodated within the 3,500 spaces available in the RRR infield car park (refer Figure 6) or in the streets surrounding the racecourse, in line with all other racegoers on these major days.

This car park is within short walking distance of the proposed hotel site.

FIGURE 6 – PROPOSED INFIELD PARKING



On non-race days, overflow parking will be available in the busway as identified in the Addendum Traffic report at **Appendix I**.

6.5.3.2 MAJOR EVENT TRAFFIC MANAGEMENT

Operational traffic management plans are currently developed for each major racing event and submitted to the NSW Police, Fire and Ambulance service and ATC Management. These plans are working satisfactorily to manage traffic movements during these major events. The following provides an overview of the proposed traffic management procedures on major event days proposed by the proponents as outlined in the Parking and Traffic Consultants report included at **Appendix I**.

- *The provision of a Parking Management Plan (PMP) would be best dealt with through a condition of consent requiring the PMP to be approved prior to the Occupation Certificate. This would enable a PMP to be prepared during the documentation period, rather than prior to the DA approval.*
- *During recent discussions with RMS the potential to install a permanent Variable Message Sign (VMS) in strategic locations was raised as this has the potential to provide a long term and cost effective alternative to the current use of mobile VMSs for each event. The permanent signs have the added benefit of continual use by RMS for safety messaging and incident warnings on the broader road network. A suitable location will need to be determined through consultation with RMS, although this could occur in response to a Condition of Consent if adopted as a viable proposal.*

Hotel carpark management

- *Parking for the hotel premises can be split into two separate user groups – hotel guests and non-hotel guests. Hotel guest parking (ie overnight guests) is located within a secure basement level, providing parking for 50 cars, with access via a ramp off the Access Way. This figure is considered to be appropriate and was determined by request from the hotel operator. Non-hotel guests (eg conference, restaurant patrons not staying with the hotel) have several parking options available to them nearby, including use of approximately 126 parking spaces on and adjacent to the busway (see figure 08 below), as well as use of the racecourse infield, where approximately 3,500 cars are able to be parked. It is anticipated that parking on non-race days will predominantly occur within the busway due to its proximity to the hotel. On race and event days however, patrons of the facility will be required to park either in the infield or on-street within proximity of the racecourse, in line with all other racegoers on these major days.*

- *Peak hotel occupancy is anticipated to coincide with major events and it is anticipated that the majority of hotel guests will check-in to the hotel prior to the event commencing, with minimal check-outs until the following morning.*

Bus Stabling

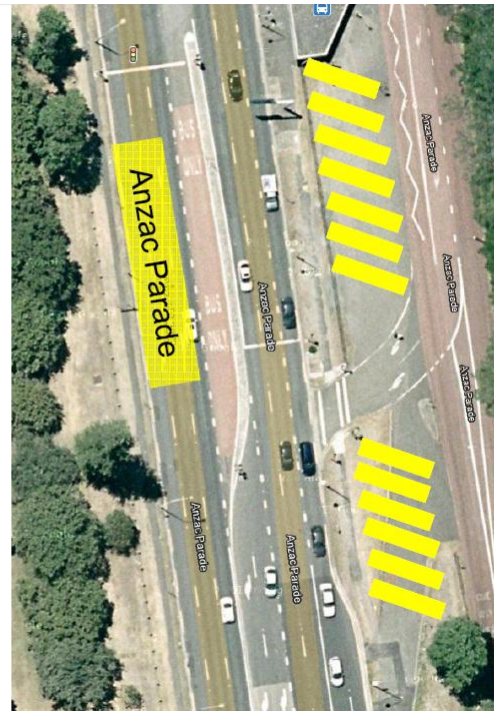
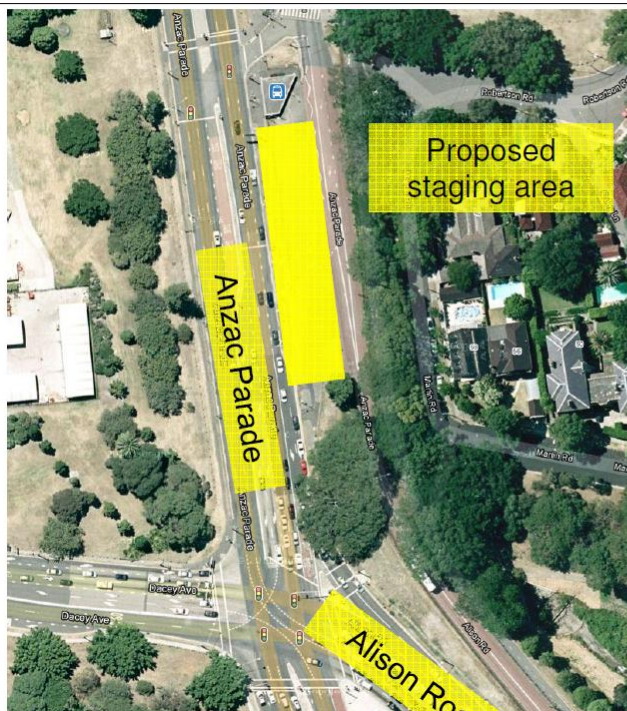
Sydney Buses in their submission to the EIS application indicated that the use of Darley Road was required for stabling purposes, however a review of the DA approval for construction of the busway in 2009 indicates that up to 13 buses are able to stable along the northern edge of the busway, removing them from the roadway, alleviating traffic congestion and reducing the risks to pedestrians crossing Darley Road.

As an improvement to the current bus staging area in Darley Road, the proponent has identified a new staging area within the busway along Anzac Parade / Centennial Park (refer to Figure 7 below). This area is currently underutilised and has the ability to stable up to 13 buses without impacting the road network.

Management of bus movements will be able to be managed utilising the same protocols as are currently implemented by ATC and STA staff, with buses marshalled into the busway via radio communication as required.

FIGURE 7 – PROPOSED ANZAC PARADE STAGING AREA

Staging Area - Anzac Parade



This arrangement will have a positive impact on the surrounding road network on major event days, as it will:

- Remove the need to stable buses on Darley Road.
- Reduce congestion and increase the capacity for effective use of the road on major event days for patron set down areas.
- Reduce the imposition on the large amount of vehicles using the roads in the area for weekend sport and access to Centennial Park.

6.6 HERITAGE IMPACTS

The proponent has reviewed the DPI letter and the specific heritage issues raised in the letter:

- *Consider the dominance of the proposal within its historic setting and the need for the proposal to support and be sympathetic to the historic significance of the Racecourse site.*
- *The design should better reflect the cultural and historic significance of the RRR.*
- *Appropriateness of the external façade in relation to the surrounding heritage items and the Randwick Racecourse Conservation Area.*

An addendum to the Statement of Heritage Impact issued with the EIS proposal (**Appendix G**) has been prepared by Graham Brooks and Associates for the Response to Submissions design. The Statement addresses the heritage issues that were raised in the DPI letter. The proponent's response to the key heritage matters for consideration outlined by Graham Brooks and Associates are discussed below:

The defining element in the Racecourse Precinct Heritage Conservation Area is the Royal Randwick Racecourse (RRR). The primary heritage significance of the RRR is its function as Sydney's oldest and longest continually operating racecourse. Heritage items proximate to the proposal are the following:

- *The Official / Members Stand, which is identified as having local heritage significance in the Randwick LEP.*
- *The former Turnstile building, which is identified as having high heritage significance in the RRR DCP.*
- *The proposal is some distance from the former Swab and Totalisator Buildings - other significant heritage elements of the Spectator Precinct.*
- The proposed hotel design is not considered to dominate the historic setting of the RRR for the reasons outlined below:
 - *The Racecourse Precinct Heritage Conservation Area is a vast and largely open space that currently accommodates development of various forms.*
 - *The proposed hotel is setback 25m from L3-7 (hotel wing) and 56m from G-L2 (lower levels) from the Official / Members Stand and 0m from L3-7 (hotel wing - it sits in line above at closest point) and 5m from lower form from the Turnstile building. These distances retain an appropriate setting for these structures.*
 - *The proposal has been sited to avoid obstructing views to and from the adjacent Official / Members Stand, and important historic views within and to the racecourse.*
 - *The former Turnstile Building is effectively a wall which formerly had openings to facilitate public entry and small enclosures to shelter ticket sellers. It would be expected that any built element in the vicinity of this structure would be higher than the wall.*
 - *The Spectator Precinct entrance has recently been refurbished to be a predominantly open space that facilitates the movement of large crowds in and out of the site. When viewed in the context of the approved development of the Spectator Precinct currently under construction it is unlikely that the spectator entrance will be dominated by the proposed hotel building.*

The proposal is considered to be a sympathetic addition to the Racecourse Conservation Area as it incorporates an area of the Spectator Precinct that currently has very limited use in the context of the overall functionality of the Spectator Precinct. The design activates the space adjacent to the former Turnstile Building which will enhance opportunities to appreciate the significance and function of this building.

In addition the proposal is considered to reflect the cultural and heritage significance of the site for the following as supported by the addendum to the HIS:

- *The primary heritage significance of Royal Randwick Racecourse is its continued use as a racecourse since the first regular meetings were held in 1863. The cultural landscape of the site has evolved continuously since the AJC's initial involvement with the site in 1860s. The proposed hotel building will not detract from the primary use of the site as a racecourse and is considered a contemporary structure to meet the evolving needs of the racing and recreation industry.*
- *The proposed development provides complementary new facilities that are compatible with the functions and significance of the Royal Randwick Racecourse. It will not have an adverse impact on any existing functional and visual relationships within the Spectator Precinct, or the wider site.*
- *Although the new addition will be a new landmark element at the Alison Road frontage of the RRR site, it will not visually dominate the Racecourse Precinct Heritage Conservation Area given the extensive size and largely open nature of the conservation area and the varied development within it.*
- *The simple form and contemporary design of the new outdoor bar structure is considered to be a sympathetic addition to the Racecourse Precinct Heritage Conservation Area.*

Finally in response to the DPIs comments received in respect to the appropriateness of the external façade in relation to the surrounding heritage items the proponent considers that the proposed facade creatively interprets the context and history of the Royal Randwick Racecourse Precinct. The proposed racecourse imagery is entirely appropriate for the location and the function of the wider RRR site and reflects the use which has been operating since 1833.

6.7 OPERATIONS AND MANAGEMENT

The DPI letter requested further information on the following operational issues:

- *Capacity.*
- *Hours of operation.*
- *Locations for amplified music.*
- *Staff and security numbers.*
- *Mitigation and prevention measures to address noise and disturbance to neighbouring residencies.*

The proponent has prepared an addendum to the *RRR Functions and Events Management Plan (Appendix F)*. The key operational details are outlined below:

Maximum Patron Capacity

AREA	MAXIMUM POPULATION
Ground	Internal – 236 Outdoor Terrace (Under Hotel Tower) – 600 Outdoor Terrace (Trackside) – 2,400
Level 1 – Conference Rooms	Level 1 – 400
Level 2 – Pool and Pool Terrace	Level 2 – 600
Total	4,236

The above figures are maximum population densities and will primarily be achieved on major event and race days. The above maximum populations will be further clarified during the liquor license application process.

Proposed Trading Hours

The hotel and its ancillary reception and back of house facilities will be operational 24 hours a day, 7 days a week to facilitate the needs of hotel guests.

The other ancillary areas including the restaurant and bar, will be operated on a commercial basis in line with the proposed hours of operation for the premises as follows:

TRADING DAY	HOURS OF OPERATION
Monday – Saturday	6:00am – Midnight
Sunday	6:00am – 10:00pm

The above trading hours will be for all guests, including hotel guests.

Amplified Music

The use of amplified equipment to distribute music and public address information throughout the hotel will predominantly occur on race and event days (this includes special event days to be determined by the operator). Amplified equipment is proposed to be located on the southern edge of the property at ground level and atop the pool terrace on level 2.

Appropriate noise mitigation measures including noise attenuation devices and suitable hours of operation will be implemented to minimise noise transmission impacts on residential areas.

On-site Security

As part of the plan of management required as part of the liquor license application for the premises, a site security management plan will be devised for approval by the relevant authority. On site security is anticipated to be focused around peak event and raceday periods. Royal Randwick Racecourse, as a 365 day a year entertainment and event precinct has additional security staff on site 24 hours a day, who will be able to address incidents specifically within the hotel precinct as well as on the periphery of the Racecourse.

On-site Staff

As above

Noise and Disturbance Mitigation Measures

Noise and disturbance mitigation measures will be a key element of the ATC's ongoing policy of disturbance minimisation to the surrounding community. The management strategies and conditions which will form part of the liquor licensing conditions will be implemented into the ATC's liquor licensing plan of management and enforced by the ATC and hotel operators staff and security. All venues within the premises will abide by and implement the responsible service of alcohol to minimise alcohol related incidents.

7 Conclusion

Following consideration of the submissions made in response to the exhibition of the Royal Randwick Racecourse Hotel, the DPI issued a letter on 17 September 2012, outlining issues and information that was required to be addressed as part of a Response to Submissions Report. These requirements related principally to the following issues:

- Bulk and scale.
- Urban design.
- Access.
- Operations and Management.
- Signage.

The Response to Submissions includes the following amendments to the original proposal to address certain issues raised by the DPI:

- Removal of roof top signage above the parapet and provision of a façade sign advertising 'Adina' at Level 7 of the façade fronting Alison Road.
- Relocation of 'Royal Randwick' rooftop signage at ground level as entry signage for the racecourse.
- The columns on the east and west ends of the proposed building have been moved inwards towards the central core of the building by 2.5m to increase the cantilever of the upper floors of the building.
- Stair cores within the undercroft space have been amended to incorporate a continuous surrounding steel mesh planter screen and steel fins to replicate the podium façade design.
- The soffit to hotel room undercroft has been developed to include a dynamic reflective metal cladding system, with the linear effect of expressed joints used to emphasise the interest in this space and catch reflections of passing movements.
- Improvements to the proposed traffic management operations on event days including the proposed new bus staging area within the busway along Anzac Parade/Centennial park to stable up to 13 buses prior to their entering the site from the proposed right hand turn from Alison Road, and removing the current arrangement of staging buses within Darley Road prior to their entry to the ATC bus layover.

The design team prepared and analysed three built form options during the design development phase. The design alternatives incorporated built form elements that addressed the DPI's design comments. The proponent has considered the design alternatives and the DPI's comments regarding built form and urban design, and strongly believes that the building envelope initially proposed and submitted with the EIS the best design response to the site for the following reasons:

- It will maintain the integrity of the site's heritage context; as well as maintain existing vistas and views to the Royal Randwick Racecourse site from Alison Road and Darley Road.
- It provides a human scale response at the ground plane which allows a sympathetic relationship between the built form and the landscape and open space setting of the site.
- It is compatible with the existing built form within the racecourse site and the wider urban context.
- It will not increase flooding impacts on the site or in the surrounding area.
- The proposed design was supported in principle by the DPI urban design review.

This report also contains additional information requested by the DPI. Where additional information has not been provided, the proponent has made a commitment to address the issue prior to construction occurring.

In conclusion, the site is considered as suitable for the proposal considering the broader racecourse function and specific Spectator Precinct in which the proposed development sits.

The proposal is cognisant of the role of ATC as a financially self-sufficient entity seeking to diversify the opportunities at the Royal Randwick Racecourse in line with the Concept Plan tabled with State and Local Government.

Appendix A

Royal Randwick Racecourse - Hotel (SSD 5002-2011) Response to Submissions – NSW Department of Planning and Infrastructure

Appendix B

Proponent's Response to Submissions

Appendix C

Architectural Plans and Photomontages – TZG Architects

Appendix D

Statement of Heritage Impact – Graham Brooks and Associates

Appendix E

Architectural Design Statement – TZG Architects

Appendix F

Addendum to the Royal Randwick Racecourse Functions and Events Management Plan – The Australian Turf Club

Appendix G

Urban Design – Thermal comfort – Technical response – WSP Buildings

Appendix H

Solar Reflectivity of External Facade – AECOM

Appendix I

Parking and Traffic Report – Parking and Traffic Consultants

Appendix J

Stormwater and Drainage Addendum – Brown Consulting

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