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Mr Mark Flanagan
Executive General Manager, Property Development
The Australian Turf Club
Locked Bag 3
RANDWICK NSW 2031

Our ref.: SSD 5002-2011

Dear Mr Flanagan,

**Royal Randwick Racecourse- Hotel (SSD 5002-2011)
Response to Submissions**

The exhibition of the Environmental Impact Statement (EIS) for the above proposal ended on Friday 31 August 2012. All submissions received by the department during the exhibition of the proposal have been forwarded to you and are available on the department's website at: <http://majorprojects.planning.nsw.gov.au>.

The Department has reviewed the submissions received and considered the proposal as detailed in the EIS. The Department has identified a number of issues and additional information to be addressed, outlined in **Attachment 1**. The key issues identified with the proposal relate to bulk and scale, urban design and access. I would ask that you provide a response to the issues raised by the Department.

In addition, the Director General, pursuant to section 85A(2) of the Act, requires you to provide a response to the issues raised in the submissions received. Please provide your response to submissions to the department as soon as possible.

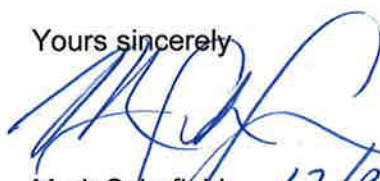
I can advise that the Metropolitan & Regional Projects, South Branch is currently reviewing the submissions made in relation to the concurrent Planning Proposal to amend the Randwick Local Environmental Plan 1998 (Consolidation), all of which have been forwarded to you.

The Metropolitan & Regional Projects, South Branch will now prepare a report summarising the submissions and any modifications to the Planning Proposal. This report will be forwarded to the Department's Sydney Region East Branch, who will produce the Department's recommendation on the Planning Proposal, following the legal drafting of the amending Local Environmental Plan. This recommendation will be forwarded to the Planning Assessment Commission (PAC) for determination. The PAC will consider the Department's recommendations on both the State Significant Development application and Planning Proposal at the same time.

Note that under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*, the days occurring between the date of this letter and the date on which you provide your response to submissions to the department are not included in the deemed refusal period.

Your contact officer, Caroline Owen, can be contacted on 02 9228 6574 or via email at Caroline.Owen@planning.nsw.gov.au. Please mark all correspondence to the attention of the contact officer.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Mark Schofield', written over the 'Yours sincerely' line.

Mark Schofield

17/9/2012

**A/Director, Metropolitan & Regional Projects South
as delegate for the Director General**

Attachment 1

Issues

Bulk & Scale

- 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:
 - 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;
 - 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;
 - 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;
 - 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;
 - opportunities to reflect the curved nature of the adjoining racecourse track in the design of the proposed building, specifically at the upper levels; and
 - opportunities to relocate or reduce the amount of bulk of the roof top plant.

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.

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.

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; and
- the appropriateness of the proposed external façade treatment in terms of:
 - achieving a design appropriate for a 'landmark building';
 - the exposed support columns, fire escape stairs and exposed underside of the upper levels;
 - the proposed use of a curtain wall with a printed imagery interlay façade;
 - the achievement of internal comfort for guests; and
 - the relationship with surrounding heritage items and the Randwick Racecourse Conservation Area, within which the site is located.
- 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.

Traffic & 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.
- 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.
- 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.
- 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.
- Consideration should be given to an alternate loading/unloading arrangement to minimise conflicts with other vehicles.
- 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.
- Consideration should be given to the inclusion of pedestrian facilities across Alison Road, west of Darnley Road to facilitate additional pedestrian traffic resulting from the proposal.

Operations & 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.

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.
- 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, (available at: <http://www.environment.nsw.gov.au/resources/heritagebranch/heritage/hmstatementsofhi.pdf>).

Additional Information

The following additional information is requested:

- 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.

- additional detail of proposed ground floor level signs including their height above ground level, whether fixed or free standing and relationship with other signage;
- 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;
- 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.
- a Landscape Impact Statement prepared by a suitably qualified professional, assessing the historic significance of the site's previous and existing landscaping schemes including.

Traffic

- 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.
- 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.
- Clarification is sought that alternative truck access across the site, required for major events on the Racecourse will remain secured.
- 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.

Flooding/Drainage

- 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 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.
- 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.

