



Environmental Impact Statement

Non-Race Day Events

Royal Randwick Racecourse

Prepared for
Australian Turf Club
9 September 2024



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Signed Declaration

Project details		
Project name	Non-race day events at Royal Randwick Racecourse	
Application number	SSD-63536466	
Address of the land in respect of which the development application is made	43 Alison Road, Randwick	
Applicant details		
Applicant name	Australian Turf Club	
Applicant address	43 Alison Road, Randwick	
Details of people by whom this EIS was prepared		
Names and professional qualifications	Sarah Horsfield, Director Bachelor of Town Planning, University of NSW Master of Environmental Law, University of Sydney	Eliza Scobie, Associate Director Bachelor of City Planning (Hons), University of NSW
Address	Level 8, Angel Place, 123 Pitt Street, Sydney NSW 2000	
Declaration		
<p>The undersigned declares that this EIS:</p> <ul style="list-style-type: none"> has been prepared in accordance with Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2021</i>; contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; does not contain information that is false or misleading; contains the information required under the <i>Registered Environmental Assessment Practitioner Guidelines</i>; addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; has been prepared having regard to the Department's <i>State Significant Development Guidelines - Preparing an Environmental Impact Statement</i>; contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; 		

- contains a consolidated description of the project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.

Signatures

 <p>Alaine Roff, Director (RPIA Plus EIA #50177)</p>	 <p>Sarah Horsfield, Director</p>	 <p>Eliza Scobie, Associate Director</p>
2 August 2024	2 August 2024	2 August 2024

Glossary and Abbreviations

Reference	Description
ACHAR	Aboriginal Cultural Heritage Assessment Report
AEP	Annual Exceedance Probability
AHD	Australia Height Datum
AHIMS	Aboriginal Heritage Information Management System
AIA	Arboricultural Impact Assessment
ANEF	Australian Noise Exposure Forecast
ATC	Australian Turf Club
AQIA	Air Quality Impact Assessment
ASS	Acid Sulphate Soils
BC Act	<i>Biodiversity Conservation Act 2016</i>
BC Reg	<i>Biodiversity Conservation Regulation 2017</i>
BDAR	Biodiversity Development Assessment Report
CEMP	Construction Environmental Management Plan
Council	Randwick City Council
CIV	Capital Investment Value
CMP	Construction Management Plan
DCP	Development Control Plan
DP	Deposited Plan
DPHI	New South Wales Department of Planning, Housing and Infrastructure
DSI	Detailed Site Investigation
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA Regulation	<i>Environmental Planning and Assessment Regulation 2021</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
EIS	Environmental Impact Statement
EPI	Environmental Planning Instrument

Reference	Description
ESD	Ecologically Sustainable Development
GANSW	Government Architect New South Wales
GFA	Gross Floor Area
GTP	Green Travel Plan
HIS	Heritage Impact Statement
IPC	Independent Planning Commission
LAeq	A frequency-weighted Equivalent Continuous Sound Level
LEC	Land Environment Court New South Wales
LEP	Local Environmental Plan
LGA	Local Government Area
LSPS	Local Strategic Planning Statement
NML	Noise Management Level
NVIA	Noise and Vibration Impact Assessment
OEMP	Operational Environmental Management Plan
R&H SEPP	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>
PAD	Potential Archaeological Deposit
PBP	Planning for Bushfire Protection
PMF	Probable Maximum Flood
POM	Plan of Management
PSI	Preliminary Site Investigation
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
RRR	Royal Randwick Racecourse
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
SIA	Social Impact Assessment
SIDRA	Signalised & Unsignalised Intersection Design and Research Aid
Site	Lot 2009 in Deposited Plan 1169042 and Lot 1642 in Deposited Plan 752011

Reference	Description
SSD	State Significant Development
SSDA	State Significant Development Application
T&I SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
TfNSW	Transport for New South Wales
TIA	Traffic Impact Assessment
VIA	Visual Impact Assessment
WMP	Waste Management Plan

Summary of EIS

Background

The NSW Visitor Economy Strategy 2020 aims to make NSW the premier visitor economy of the Asia Pacific by 2030, with Sydney as a key events destination for international and national visitors.

The Strategy further highlights the importance of ongoing recovery and rebuilding of the cultural and events industry since the COVID-19 pandemic, and the importance of utilising existing infrastructure to support a vibrant 24-hour tourism, events and creative industry. To achieve this objective, it is essential the NSW Government collaborates with existing landholders and recreational managers within NSW to activate existing assets and increase event capacity within Sydney.

The Royal Randwick Racecourse has been a key recreational asset to the Greater Sydney region for over 150 years. The site is managed by the Australian Turf Club (**ATC**) (formerly the Australian Jockey Club) for the core provision of 45 race day events per year, in addition to a range of small non-race day events of up to 5,000 people under an existing approval to diversify and activate the site outside of the race calendar. The site has previously hosted larger music festival events of up to 50,000 patrons under historical consents that have now lapsed.

The ATC has been engaging with the Department of Planning, Housing and Infrastructure (**DPHI**) since 2020 on a proposal to accommodate non-race day events on the site to diversify the site activities and reinforce the reputation of the Racecourse as a world class venue for large-scale recreation/entertainment activities. The intent is to seek a flexible consent to enable a range of non-race day events throughout the year; removing the need to apply for development consent each time for non-race day events greater than 5,000 patrons, which will provide greater certainty to the local community of the maximum number of non-race day events held each year (rather than on an ad hoc basis). It will also allow the multi-use of the site that would otherwise be off limits to the public other than on a race day or for other small non-race day events.

This application is the result of considered engagement, review and preparation over the past four years.

Overview

This Environmental Impact Statement (**EIS**) has been prepared in support of SSD-63536466 to assess the environmental, social and economic impacts of the application. Consent is sought for:

- Use of land and buildings within the Spectator Precinct of the Royal Randwick Racecourse for various non-race day events. Non-race day events may include (but are not limited to) a range of community events, private and corporate events/functions, festivals, cultural / art events, markets, and consumer roadshows.
- A total of ten events per annum with a capacity of 5,000 – 15,000 patrons (at any point in time per day) is proposed.
- The duration of events will be between 1 – 3 days (consecutive days). No event will continue for more than a consecutive 3-day period (excluding bump-in and bump-out procedures).
- Use of onsite car parking within the Infield Precinct (3,500 spaces) and the multi-deck car park (574 spaces).
- The proposal involves the erection of ancillary temporary structures within the Spectator Precinct including stages, marquees, screens, amenities, and lighting poles to support the non-race day events.

The EIS has addressed the issues identified in the Secretary's Environmental Assessment Requirements (**SEARs**) issued on 14 November 2023 and has been prepared in accordance with Part 8, Division 5 of the *Environmental Planning and Assessment Regulation* (**the Regulations**).

The application is classified as State significant development (**SSD**) as development for the purposes of non-race day events at the Royal Randwick Racecourse is assessed as SSD under clause 4 of schedule 2 of the *State Environmental Planning Policy (Planning Systems)* (**Planning Systems SEPP**).

The Proposal

The proposal represents an orderly and economic use of the site as it will continue an existing use as a recreational and entertainment facility. The ATC are experts in managing events of this size and the site has existing infrastructure and processes to service these events. The proposal will increase the vibrancy of the site outside of race day periods and support NSW as a thriving visitor economy with a range of events, managed by the implementation of a robust management framework.

The proposal will contribute to the ATC's objective to support the ongoing pre-eminence of the Royal Randwick Racecourse as the premier recreational destination in Sydney.

The proposal will promote the diversification of the ATC business and revenue stream and as such will assist in securing the future of the racecourse, a recognised community facility. The large scale of the site can comfortably accommodate non-race day events of between 5,000 patrons to 15,000 patrons, including the ancillary temporary structures which will have no adverse impact on view corridors.

Planning and Environmental Assessment

The proposal has been assessed in accordance with its consistency with the key planning objectives, priorities and actions outlined within relevant strategic land use, design and transport planning policies.

This Environmental Impact Statement assesses the proposal against the applicable State statutory controls, environmental planning instrument and approval requirements. This assessment has demonstrated the development proposal is wholly permissible with development consent in the RE1 Public Recreation Zone, and that the Minister can grant consent to the development under the Planning Systems SEPP.

All pre-conditions and mandatory considerations to exercising the power to grant approval have been assessed within this Environmental Impact Statement and the appended documentation. Due to the scope of the project, there are limited planning provisions applicable and the proposal achieves full compliance with the planning provisions of the *Randwick Local Environmental Plan 2012 (Randwick LEP 2012)*. The proposal is justified for the following reasons:

The proposal satisfies the applicable local and State strategic and statutory planning controls:

- ✓ The proposal is consistent with the key statutory land use and planning objectives of the *Environmental Planning and Assessment Act (EP&A Act)* and the Randwick LEP 2012. An assessment of the proposal against relevant statutory planning provisions demonstrates the proposal achieves the intent and is consistent with the relevant provisions.
- ✓ The proposal will support the Randwick local government area (LGA)'s tourist and entertainment economy consistent with the strategic objectives for the area and contribute to the ongoing status of the racecourse as a key recreational asset in the Eastern City District. The multi-purpose use of the Racecourse is aligned with the Randwick Local Strategic Planning Statement (LSPS) and will enable the use and enjoyment of the Racecourse by a wide spectrum of the community.

The proposed accommodation of race day events on the site can be appropriately managed by the Australian Turf Club:

- ✓ The site is a private recreation space that has accommodated a variety of events over the past 150 years. The historic use of the site for race day and non-race day events has led to the refinement of the crowd management procedures at Randwick Racecourse which have been adopted in the draft Operational Plan of Management. This extensive experience will ensure any functions will run smoothly with minimal impact on the surrounding residents.
- ✓ The draft Operational Management Plan (OMP) and accompanying reports will be further developed and refined for each event with input from the event operator.

Cumulative impacts can be managed through ongoing consultation with key stakeholders:

- ✓ Non-race day events for 5,000 – 15,000 patrons (at any one time) will be managed by a key stakeholder group (KSG) formed to oversee the environmental performance of events. This will ensure all potential impacts of events are considered prior to the event occurring and can be effectively managed during and after the event occurrence.

- ✓ The ATC enjoys a long-standing and effective relationship with stakeholders in the surrounding area including NSW Police Force, Moore Park Events Operation Group (**MEOG**) and local residents to ensure a positive dialogue is maintained for the resolution of complaints and community dissatisfaction during future events.
- ✓ Regular consultation with the MEOG prior to scheduling events will occur under this application. This is a key measure to prevent cumulative impacts to the Moore Park Precinct and will ensure non-race day events are coordinated with other events in the Moore Park precinct and avoid scheduling of events simultaneously (where possible). This is similar to the management of previous large events on the site including the Music Festival Consent SSD-6134.
- ✓ Race day events will continue to be prioritised as the core use of the site.

Events will deliver a suitable use of the site that responds to the site opportunities and constraints:

- ✓ The site is of a sufficient size and capacity to accommodate events of this size. The maximum patrons for race day activities are up to 50,000 patrons, with a typical race day event attracting between 35,000 – 40,000 patrons. The site can comfortably accommodate 15,000 patrons within the Spectator Precinct.
- ✓ Events will not be permitted within the Stables Precinct on the south-eastern corner of the site or Services Precinct where the Light Rail yards are located, to ensure there is no impact to horse stabling and services during events.
- ✓ The indicative layout plan demonstrates how the site layout will maximise permeability and connectivity through the Spectator Precinct through placement of large structures adjacent to existing built structures to enable clear pathways through the site. The orientation of stages inwards towards the site will ensure sound and light is directed to patrons as required and minimise noise amelioration and light spill to the residential areas to the north-east and west along Doncaster Avenue.
- ✓ The proposed approach to erect temporary structures within the Spectator Precinct is sought to provide sufficient flexibility to future event operators based upon event-specific requirements. As discussed in this EIS, the provision of ancillary temporary structures is consistent with the site operation for race events and will be erected within 10 days preceding the event and dismantled and removed from the site within 10 days following the event, and as such any impact will be temporary and short-term.

Key environmental impacts associated with events can be managed:

- ✓ PTC consultants consider that traffic impact from patrons and vehicles departing the site would not result in adverse impacts as traffic exiting the site will be on an infrequent basis for a short duration following each event and mitigation measures are proposed to reduce the impact of patron and vehicle noise.
- ✓ The site currently accommodates 4,074 parking spaces and as such these facilities provide sufficient capacity to accommodate parking, drop off and pick up movements. The proposed mitigation measures to incentivise use of public transport will reduce demand for these facilities.
- ✓ Noise modelling completed by GHD demonstrates music and non-music events can comply with the proposed noise criteria. Prior to any music event, a sub-plan would be prepared by the operator detailing how the requirements of the noise management plan would be met. This would include noise modelling of their proposed sound system configuration showing how the adopted noise limits could be met at all receiver locations. In addition, GHS recommend a permanent noise management system (**PNMS**) along the site boundary (representative of the most-affected receivers) to determine compliance during rehearsals and events.
- ✓ The LIA demonstrates that any lighting impact to amenity of residents or road users would be of a temporary, short-term nature as all lighting structures will be dismantled after each non-race day event and as such is acceptable. The provisions of AS/NZS 4282:2023 do not technically apply to the proposed installation of three temporary stage lighting structures. Any indicative stage lighting would

be oriented inwards towards the site and the event patrons, to minimise spill lighting as much as possible within the limits of the lighting function.

The proposal is highly suitable for the site:

- ✔ The proposal will allow the ongoing use of the site as a recreation facility (major) which is permissible with consent and consistent with the RE1 Public Recreation zone objectives. Further, there are no significant environmental constraints that would limit the proposal from being accommodated at the site.

The proposal is in the public's best interests:

- ✔ The proposal will create 107 ongoing indirect jobs per annum and 37 ongoing indirect jobs per annum. The proposal will stimulate local investment and contribute significant economic output and value add to the economy through contribution of \$19 million gross value added annually.
- ✔ Subject to the various mitigation measures recommended by the specialist consultants, no adverse, social or economic impacts will result from the proposal in terms of traffic, noise and vibration, or views during ongoing operation of events.
- ✔ Engagement with relevant community, government and agency stakeholders has been undertaken with respect to the proposed development, with no major issues having been raised through the consultation processes. It is noted that ongoing consultation with the community as part of the public exhibition of this SSDA.

The assessment outlined within this EIS and accompanying technical reports concludes that the project objectives can be achieved whilst balancing the wide range of competing urban design, environmental, economic and social considerations and is therefore in the public interest.

In view of the above, it is considered that this SSD application has significant merit and should be approved by the Minister for Planning and Public Spaces (**the Minister**) subject to the implementation of the mitigation measures described in this report and supporting documents.

1. Introduction

1.1. Purpose of this Report

This EIS has been prepared by Urbis on behalf of the Australian Turf Club Limited (ABN: 81 148 157 288) (**ATC, the Proponent**). This EIS is lodged in support of a SSDA for non-race day events and activities within the land and buildings of the Spectator Precinct of the Royal Randwick Racecourse (**the Racecourse / the site**).

The Racecourse is located at 43 Alison Road, Randwick, within Lot 2009 in DP 1169042 and Lot 1642 of DP 752011. The Racecourse is located within the Eastern District of Greater Sydney as illustrated in **Figure 1**.

Figure 1 Regional Context Map



Source: Urbis

This EIS has been prepared in response to SEARs issued on 14 November 2023 and with consideration of the *State significant development guidelines – preparing an environmental impact statement* released by the DPHI in July 2022.

As the proposal seeks consent for development/use of the Racecourse site for the purposes of an event that is not a race day event, the development is defined as State significant under section 4 of Schedule 2 of Planning Systems SEPP.

The Minister or their delegate is the consent authority for the application or the Independent Planning Commission (**IPC**) where an objection is received from the local Council or more than 50 unique public objections are received during the exhibition period. The ATC has not made a reportable public donation in connection with this application.

This EIS includes an assessment with the strategic and statutory planning framework under the EP&A Act and any environmental impact of the proposed works. This EIS should be read in conjunction with consultant documentation and plans appended to this report.

1.2. Applicant Details

The applicant details for the proposed development are listed in the following table.

Table 1 Applicant Details

Descriptor	Proponent Details
Full Name(s)	Australian Turf Club Limited
Postal Address	Alison Road, Randwick, NSW 2031
ABN	81 148 157 288
Nominated Contact	Matt Sharman, Head of Hospitality and Venues

1.3. Project Description

This application seeks approval for the use of land and buildings within the Spectator Precinct of the Racecourse for various non-race day events. A total of ten events per annum with a capacity of 5,000 – 15,000 patrons (at any point in time per day) is proposed. The duration of events will be between 1 – 3 days (consecutive days). No event will continue for more than a consecutive 3-day period (excluding bump-in and bump-out procedures).

Onsite car parking is proposed to be accommodated in the Infield Precinct and the multi-deck car park, consistent with existing practice.

Non-race day events of 5,000 – 15,000 patrons may include (but are not limited to) a range of community events, private and corporate events/functions, festivals, cultural / art events, markets, and consumer roadshows.

The application also involves the erection of temporary structures including stages, marquees, and ancillary structures such as amenities. The construction of various temporary structures to facilitate the non-race day events will be erected in the days preceding the events and dismantled and removed from the site within 10 days following the event.

The proposed hours of operation are:

- Monday – Thursday: 10am – 8pm
- Friday, Saturday, Sunday or public holiday: 10am – 10:30pm
- Bump in and bump out may occur between 6am – 1am the following day for a maximum of 10 days prior to and following the event.

1.4. Project Objectives

The proposal aims to achieve the following objectives:

- Obtain a more flexible development consent for holding a variety of non-race day events on the site. The proposal will allow for an array of small and medium sized cultural events, trade shows and conferences by removing the need to apply for development consent each time.
- Provide greater certainty to the local community of the maximum number of non-race day events, rather than these events being approved on an ad hoc basis.
- Reinforce the reputation of the Racecourse as a world class venue for large-scale sporting and recreation activities by accommodating a variety of non-race day events, festivals and the like of varying size throughout the year. The multi-purpose use of the Racecourse is aligned with the Randwick Local Strategic Planning Statement and will enable the use and enjoyment of the Racecourse by a wide spectrum of the community.

- Promote the diversification of the ATC business and revenue stream in a post-COVID era. It will also allow the multi-use of the open space of the Racecourse that would otherwise be off limits to the public other than on a race day or other special events.
- Maintain the ongoing primacy of the horseracing and training function of the site, which will take precedence over non-race day activities throughout the year in accordance with the Racecourse leasing structure and the obligations of the Randwick Racecourse Trust (refer to discussion in **Section 2.2**). Non-race day events will not conflict with regular operations, or race day scheduling, including the Spring Racing Carnival, Everest Carnival and Autumn Carnival.
- Utilise the excellent existing public transport and infrastructure available at the Racecourse, with special transport and management procedures to ensure events run smoothly and with minimal amenity impact to surrounding residents.

1.5. Project Background

1.5.1. Royal Randwick Racecourse

The Racecourse has an extensive history within Australia's recreational and entertainment culture for over 150 years. The Racecourse has a long history of hosting a variety of racing and non-racing events, including in more recent years a number of major non race day events.

The Racecourse is one of the largest recreation areas in the highly urbanised Eastern Suburbs of Sydney, and is arguably one of the key recreational, event and entertainment sites in Sydney and NSW. This is reflected in its identification as a State Significant Site in the Planning Systems SEPP. The Racecourse is located within a major open space and entertainment precinct that includes a range of passive and active recreation areas and sporting facilities, comprising Moore Park Golf Course, the Moore Park Sport Precinct (including Sydney Cricket Ground and Allianz Stadium), the Entertainment Quarter and Centennial Park, as illustrated in the regional context map provided in **Figure 1**.

1.5.2. SEARs

SEARs for a proposal to accommodate 21 non-race day events at the site were initially issued by the DPHI on 24 December 2020 (SSD-11973381).

Subsequent to this, the Regulations were amended on 1 July 2021 under the DPHI's Rapid Assessment Framework. The amendments, and specifically the introduction of section 177 of the Regulations and the associated sunset clauses, introduced an expiry date for SEARs issued between 1 July 2019 - 30 June 2021. All SEARs issued during this time expired on 1 July 2023. The SEARs for SSD-11973381 therefore expired and the application was withdrawn in November 2023.

Accordingly, a new Scoping Report was submitted to DPHI in September 2023 for SEARs for ten non-race day events per annum with capacity of 5,000 – 15,000 patrons at the Racecourse (**this application**). SEARs were issued on 14 November 2023 (SSD-63536466).

SEARs Compliance is provided at **Appendix A**.

1.6. Related Development

1.6.1. Royal Randwick Current Development Applications

An overview of the current development consents related to the proposal is outlined in **Table 2**.

Table 2 Related development applications

Application	Summary	Relevance
MP10_0097 MOD1 and MOD2	On 7 February 2011, the Planning Assessment Commission (PAC) (on behalf of the Minister of Planning), granted Major Project Approval MP10_0097 for the redevelopment of the	Minor non-race events/functions for up to 5,000 patrons on the site is currently permitted

Application	Summary	Relevance
Spectator Precinct approval	<p>Racecourse Spectator Precinct. The project was modified under MP10_0097 MOD 1 on 25 February 2012.</p> <p>On 4 April 2013, MP10_0097 MOD 2 was approved which granted consent for the continued use of the Spectator Precinct for non-race day events, provision of a restaurant uses and adjustment of precinct boundaries. This approval granted consent for the use of “land and buildings” for minor non-race day events on the Spectator and Infield Precinct which meet the conditions of the approval. A separate DA is required to be submitted to and approved by the DPHI with regard to any non-race day events/functions beyond the scope of this approval.</p> <p>There is no cap on the number of events per annum under this consent.</p>	<p>under MP10_0097 SSD MOD 2.</p> <p>This application seeks consent for events with patron capacity of 5,000 – 15,000 patrons.</p> <p>The ATC will retain Spectator Precinct MOD 2 and continue to host events up to 5,000 patrons under this previous consent.</p> <p>Cumulative impacts associated with the accommodation of events up to 5,000 and non-race day activities between 5,000 – 15,000 patrons at the Racecourse are discussed in Section 6.</p>
SSD 8706 Night Racing	<p>SSDA 8706 was approved in November 2022 and seeks consent for up to 16-night racing events per annum at the Racecourse between October and April, coinciding with NSW Daylight Savings).</p> <p>The proposal includes the installation of new trackside lighting (new light poles) and the upgrade to the existing Spectator Precinct lighting (new lamps will be mounted on existing poles to improve safety). Night-racing events will not increase the number of racing events held at the Racecourse per year (currently 45 races per year) as the proposed night racing events would replace existing day racing events.</p>	<p>No change. This approval relates to racing events and is separate to the scope of this application which is for non-race day events.</p> <p>Cumulative impacts associated with the accommodation of night racing and non-race day activities at the Racecourse are discussed in Section 6.</p>
SSD 10285 Winx Stand	<p>SSD 10285 was approved on 13 July 2020 for construction and operation of a two storey multi-purpose facility known as the ‘Winx Stand’. The principal purpose of the building is recreation facility (major) for race-day events at Randwick Racecourse. The building may be used for ancillary purposes associated with non-race day events. The patron capacity of the Winx Stand is approximately 7,500 patrons.</p>	<p>No change. The Winx Stand is located within the Spectator Precinct and as such it is proposed that the non-race day events for 5,000 -15,000 patrons can be held within this building (and in the surrounding Spectator</p>

Application	Summary	Relevance													
	<p>There is no cap on the number of events per annum under this consent. The hours of operation for indoor events within the Winx Stand under this approval is:</p> <table><tr><th>Event type</th><th colspan="2">Hours of operation</th></tr><tr><td>Race-day events</td><td colspan="2"><ul style="list-style-type: none">Monday to Sunday 10:30 am to 6:45 pm</td></tr><tr><td rowspan="3">Non-race day events</td><td><ul style="list-style-type: none">Indoor amplified events</td><td><ul style="list-style-type: none">Sunday to Thursday and public holidays 7 am to 12 midnightFriday and Saturday 7 am to 2 am</td></tr><tr><td><ul style="list-style-type: none">Outdoor unamplified events</td><td><ul style="list-style-type: none">Sunday to Thursday 7 am to 10 pmFriday and Saturday 7 am to 12 midnight</td></tr><tr><td><ul style="list-style-type: none">Outdoor amplified events</td><td><ul style="list-style-type: none">Monday to Sunday 9 am to 10 pm</td></tr></table>	Event type	Hours of operation		Race-day events	<ul style="list-style-type: none">Monday to Sunday 10:30 am to 6:45 pm		Non-race day events	<ul style="list-style-type: none">Indoor amplified events	<ul style="list-style-type: none">Sunday to Thursday and public holidays 7 am to 12 midnightFriday and Saturday 7 am to 2 am	<ul style="list-style-type: none">Outdoor unamplified events	<ul style="list-style-type: none">Sunday to Thursday 7 am to 10 pmFriday and Saturday 7 am to 12 midnight	<ul style="list-style-type: none">Outdoor amplified events	<ul style="list-style-type: none">Monday to Sunday 9 am to 10 pm	<p>Precinct). The ATC seeks to retain both approvals.</p> <p>Cumulative impacts associated with the accommodation of night racing and non-race day activities at the Racecourse are discussed in Section 6.</p>
Event type	Hours of operation														
Race-day events	<ul style="list-style-type: none">Monday to Sunday 10:30 am to 6:45 pm														
Non-race day events	<ul style="list-style-type: none">Indoor amplified events	<ul style="list-style-type: none">Sunday to Thursday and public holidays 7 am to 12 midnightFriday and Saturday 7 am to 2 am													
	<ul style="list-style-type: none">Outdoor unamplified events	<ul style="list-style-type: none">Sunday to Thursday 7 am to 10 pmFriday and Saturday 7 am to 12 midnight													
	<ul style="list-style-type: none">Outdoor amplified events	<ul style="list-style-type: none">Monday to Sunday 9 am to 10 pm													
SSD 38019507 Hotel	<p>SSDA 38019507 was lodged in September 2023 for the construction and operation of a mixed-use hotel development within the Spectator Precinct of the Racecourse. The location of the hotel is within the north-western portion of the Spectator Precinct, in the current location of the Oaks Marquee. The Hotel was approved on 8 July 2024.</p>	<p>No change. No events are proposed to occur within the building footprint area of the Hotel as illustrated in the Site and Precinct Plan prepared by MI Global.</p>													

1.6.2. Royal Randwick Historical Consents

A number of development consents for non-race day events at the site have been issued by Randwick Council and DPHI. These historical development consents demonstrate:

- The history of non-race day activities at the Racecourse,
- The ability for the proponent to manage non-race activities within the Racecourse, which is a specialised entertainment and recreational precinct, and
- The inefficiencies of seeking approval for singular non-race activities at the site on an ad-hoc basis. This has resulted in less certainty for the ATC, DPHI, Council, event promoters, and the community in managing the occurrence and duration of non-race events on the site.

Non-race day event applications which were approved as local DAs by Randwick City Council, were issued prior to the classification of the site as a 'State Significant Precinct' under the Planning Systems SEPP.

Consents issued for non-race day events at the Racecourse include:

- DA 904/2005 – Approval granted on 1 February 2006 for 'Future Music Festival' with 10,000 patrons.
- DA 74/2007 – Approval granted on 14 March 2007 for 'Future Music Festival' with 15,000 patrons.
- DA 987/2007 - Approval granted on 5 March 2008 for 'Future Music Festival' with 35,000 patrons.
- DA 694/2008 – Approval granted on 25 November 2008 for 'Future Music Festival' with 25,000 patrons. A modification application was later approved by the Land and Environment Court on 19 February 2009 to increase the patronage numbers to 35,000 patrons.
- DA 873/2009 – Approval granted on 9 February 2010 for 'Future Music Festival' with 38,000 patrons.
- DA 851/2010 – Approval granted on 7 December 2010 for 'Future Music Festival' with 42,000 patrons.
- SSD 4995-2011 – Approval granted on 8 February 2012 for a music festival with 45,000 patrons.

- SSD-5394-2012 – Approval granted on 1 February 2013 for ‘Future Music Festival’ with 50,000 patrons. It was subsequently modified to seek approval for an event on Sunday for 40,000 patrons.
- SSD 6134-2013 – On 5 March 2014, the Minister of Planning granted SSD Approval 6134-2013 for a two-day music festival for the second weekend of March every year for a total of ten years. The approval granted consent for up to 50,000 patrons on Saturday and 20,000 patrons on Sunday. The proposal also involves the assembly of temporary structures associated with the event, bump in and bump out 10 days prior and following the event.

On 27 November 2014, a Section 4.55(1)(A) modification application to amend the description of SSD-6134-2013 was approved. The application sought to amend the wording of the consent from permitting an event in the “second weekend of March every year...” to permitting an event “about the beginning of March every year...”. The consent was granted for 10 years and lapsed on 5 March 2024.

All historical development consents for one-off non-race day events on the site have lapsed.

1.6.3. Moore Park Events Precinct Development Applications

An overview of the current development consents located within the Moore Park events precinct (discussed in **Section 2**) that are related to the event is outlined in **Table 3**.

Table 3 Related development applications

Application	Summary	Relevance
D/2024/336	Approval granted on 24 June 2024 by City of Sydney Council for use of the Show Ring in the Entertainment Quarter for a Cirque du Soleil event each year over five months, for a period of five years, and erection of associated temporary structures.	Condition 25 of the consent identifies general requirements for erection of temporary structures associated with the event. This application similarly seeks a condition of general requirements for temporary structures on the site to provide flexibility for operators.
D/2024/139	Application to City of Sydney Council for use of the former coach bay within the Entertainment Quarter for outdoor recreation, film production, exhibitions and temporary activities such as markets. Proposed hours of operations are between 7.00am and 12.00 midnight Monday to Sunday. No concert or music events proposed.	Application under assessment. The application demonstrates the accommodation of a range of events in the Moore Park precinct. Cumulative impacts associated with the events in the precinct are discussed in Section 6 .
SSD-9835-MOD 8	<p>Approval granted by the Deputy Secretary on 15 December 2023 for a modification to the Sydney Football Stadium SSD consent to permit:</p> <ul style="list-style-type: none"> ▪ increase the concert cap from 6 per year to 20 per year and concert length from 5 hours to 10 hours (twice a year). ▪ alter rehearsal and sound test finish time from 7pm to 10pm. ▪ curfew exemption for Mardi Gras. <p>The facility has a stadium capacity of 45,000 seats and 55,000 patrons in concert mode.</p>	The consent grants consent for accommodation of large events up to 55,000 patrons on the site. This application provides an alternative offering of medium sized events up to 15,000 patrons. Cumulative impacts associated with the events in the precinct are discussed in Section 6 .

2. Site Description and Context

2.1. Regional Context

Royal Randwick is one of the largest recreation areas in the highly urbanised Eastern Suburbs of Sydney. It is located within a major open space, event and entertainment precinct known as the 'Moore Park Precinct' that includes a range of passive and active recreation areas and sporting/entertainment facilities including Centennial and Moore Parks, Allianz Stadium (Sydney Football Stadium), the Entertainment Quarter (including Hordern Pavilion) and the Sydney Cricket Ground.

The proximity of these facilities to the site is illustrated in **Figure 2**.

Figure 2 Moore Park Events precinct



Source: Urbis

The key corridors within the south-eastern subregion include Anzac Parade which runs along the western side of the racecourse, and Alison Road running along the eastern side of the racecourse. Each of these roads provide key corridors linking the eastern suburbs to the Sydney CBD.

Royal Randwick has an interface with several different localities each with a distinct character, including:

- **North** – Centennial Park directly opposite the site, on the opposite side of Alison Road.
- **East** – predominantly residential area, with frontage to Wansey Road. This area is elevated above the level of the racecourse but views across the racecourse are well screened by a row of mature fig trees. Further east – Randwick shopping village is approximately 1.5km away.
- **South** – the University of NSW is located along the entire southern boundary of the site fronting High Street, and the Prince of Wales Hospital is located less than 1km away.
- **West** – residential area consisting of a mix of one and two storey single dwellings and three storey residential flat buildings. Further west – Kensington village shopping strip located along Anzac Parade.

2.2. Site Identification

Royal Randwick is located at 43 Alison Road, Randwick. The legal description of the site is Lot 2009 in Deposited Plan 1169042 and Lot 1642 of DP 752011 and the site has an area of 79.93 hectares.

The site is located approximately 6 km south-east of the Sydney Central Business District (**CBD**) and is located within the Randwick LGA.

The site is broadly located between Anzac Parade and Alison Road in Randwick. Specifically, the site is bound by Alison Road to the north, Wansey Road to the east, High Street and part of Anzac Parade to the south, and the rear of residential dwellings fronting Doncaster Avenue along the western site boundary. A portion of land occupied by Transport for NSW (**TfNSW**) for the CBD and South East Light Rail (**Light Rail**) stabling and maintenance yard adjoins the site to the north-west.

2.2.1. Site Precincts

This SSDA will relate to events within the Spectator precinct of the racecourse, and parking located in the Infield Precinct as per existing practice. These precincts are defined in the former Part 3A Project Approval MP08_0092 (and MOD1), the Major Project Approval MP10_0097 (and MOD 1 and 2), and the Randwick Development Control Plan 2013 (**the DCP**).

Key features of these precincts are outlined in **Table 4**, and the location of these precincts identified in **Figure 3**.

Figure 3 Identification of precincts within the Racecourse



Source: Urbis

Table 4 Identification of site precincts

Precinct	Key features
Spectator Precinct	<p>The Spectator Precinct is located in the north-west corner of the site. The Spectator Precinct has a primary frontage to Alison Road and secondary access to Doncaster Avenue / Ascot Street and was subject to a major upgrade completed in 2013 to improve patron accessibility and enhance patron experience. The Spectator Precinct accommodates a concentration of race day, ATC management and entertainment activities, including:</p> <ul style="list-style-type: none"> ▪ The Queen Elizabeth II (QE II) Stand is a long-line, low scale building along the north-western boundary of the racecourse. The QE II Stand was completed in 1992. ▪ The Members Stand (also known as the Officials Stand) is a three-storey building located adjacent to the QE II Stand on the north-western boundary of the racecourse. The Members Stand is the earliest grandstand and possibly the earliest building remaining at the racecourse, and as such is a local heritage listed item. The Members Stand was constructed in approximately 1886 with the building eventually extended in 1913 and 1920. ▪ The Winx Stand is located to the immediate south of the QE II Stand and is adjacent to the multi-deck car park. The Winx Stand opened in 2021, and is a two-storey multi-purpose building with an elevated pedestrian bridge linking to the QE II Stand. ▪ Octagon Bar and surrounding gardens. ▪ Theatre of the Horse training circuit. ▪ A 4 level multi-deck car park and taxi stand, providing access to Doncaster Avenue via Gate 18. The multi-deck car park provides 574 car parking spaces (refer Picture 5). ▪ Oaks Lawn Marquee, a temporary marquee located on the northern boundary of the site adjacent to a hardstand and services area. <p>Access and egress infrastructure in the Spectator Precinct such as the exclusive bus way and taxi terminal have been designed and constructed to facilitate a crowd of up to 55,000 people.</p>
Infield Precinct	<p>The Infield Precinct is located in the centre of the site, and accommodates training, new race day spectator facilities, and irregular non-racing recreation and entertainment events. An at-grade car park is located within the Infield Precinct and provides car parking for 3,500 vehicles. The car park is activated during race day and some non-race day events. A trainer's hut and grassed area occupies the remainder of the precinct.</p> <p>An underground vehicular tunnel runs in a north-south direction, connecting the Infield Precinct with the stabling facilities and site access point in the southern portion of the site. The tunnel is utilised to transport horses and trainers during race day events.</p>

Precinct	Key features
	An underground pedestrian tunnel also runs in an east-west direction, connecting the Infield and Midfield precincts with the Spectator Precinct. The access point is located beneath the Members Stand in the Spectator Precinct, and within the Midfield Precinct beneath a shaded area adjacent to metal ticket booths.
Midfield Precinct	<p><u>This precinct is not included in this SSDA.</u></p> <p>The Midfield Precinct is located in the central northern portion of the site, anchored by the racetrack on either side. The Midfield Precinct accommodates race day spectator facilities and irregular non-racing recreation and entertainment functions.</p> <p>The Midfield Precinct currently accommodates an equipment shed, grassed area, gravel paths and a detention basin.</p>

2.2.2. Key Features

Table 5 Key Features of Site and Locality

Descriptor	Site Details
Site Ownership	<p>The site is Crown Land and is owned by the Randwick Racecourse Trust established under Part 2A of the Australian Jockey and Sydney Turf Clubs Merger Act 2010 (Merger Act 2010). The site is leased to the Australian Turf Club (formerly known as the Australian Jockey Club) for a 99-year period until 2107 under section 33 of the Merger Act 2010.</p> <p>The key function of the Australian Turf Club is to “manage, use and maintain the land that comprises the Racecourse for the purpose of a public racecourse and associated activities”. Additionally, section 30(1) of the Merger Act 2010 outlines the Australian Turf Club may utilise the Racecourse for other activities.</p>
Topography	The majority of the site is very flat, particularly around the central racetrack and the north-western and western portion of the site. The landform along the eastern edge of the site grades up steeply with a 6 metre ground level at the intersection of Wansey Road and Alison Road and 26 metre ground level at the corner of Wansey Road and High Street.
Acid Sulphate Soils	The Acid Sulphate Soil Risk Map for Botany Bay (Edition 2, 1997) and NSW Acid Sulphate Soil Risk Map indicates that there is no known occurrence of acid sulphate soils at the site and the site is not located within an area of known acid sulphate soils. As such, the potential presence of acid sulphate soils on the site is low, which is consistent with the site’s elevation above 30m AHD.
Contamination	Royal Randwick Racecourse has an extensive history of being cleared and used as a racecourse, which suggest the site has a relatively low potential for contamination. Historical data and aerial photography indicates the site has undergone modifications which includes the past construction and removal of a

Descriptor	Site Details
	grandstand structure and other associated racecourse infrastructure. There is no excavation or significant ground disturbance proposed under this application. This is discussed further in Section 4 .
Bushfire Prone Land	The site is not identified as bushfire prone land on the NSW Rural Fire Service (RFS) map.
Flora and fauna	<p>The site comprises previously cleared land, with some planted native and exotic vegetation including mature trees, shrubs and groundcovers that surround built structures. Cumberland Ecology have assessed the site and confirm all vegetation is planted and does not conform to a naturally occurring native vegetation community. The composition, structure and function of vegetation has been altered significantly from a natural state. All vegetation present in the site is routinely maintained through trimming and mowing to maintain the landscaped character of the site and the use of the site for the core racing and entertainment function.</p> <p>Planted native trees include seven mature <i>Ficus rubiginosa</i> (Port Jackson Fig), three <i>Ficus macrophylla</i> (Moreton Bay Fig) and one non-endemic <i>Lophostemon confertus</i> (Brush Box). Additional vegetation include shrubs and groundcovers, predominately of exotic species. Fauna within the site is limited to the aforementioned planted native vegetation. All buildings are well maintained and do not accommodate a suitable habitat for fauna, such as microbats.</p> <p>The SSDA does not seek to remove any vegetation from the site. A BDAR Waiver was issued by DPHI.</p>
Easements and covenants	<p>A number of easements and covenants apply to the site, including:</p> <p>Lot 1642 in DP752011:</p> <ul style="list-style-type: none"> ▪ Subject to reservations and conditions under Crown grant. ▪ Dedicated for the purposes of public recreation. ▪ Lease to Australian Turf Club. ▪ DP1150063 – Right of carriageway (variable width) ▪ DP1150063 – Easement for services (variable width) ▪ DP1276517 – Right of carriageway (1, 1.1, 3.66, 4, 5, 5.72, 6 and 6.185m wide and variable width) <p>Lot 2009 in DP1169042:</p> <ul style="list-style-type: none"> ▪ Subject to reservations and conditions under Crown grant. ▪ J758496 - Easement for water sewerage and drainage 7.62m wide located along the south-western portion of the site, between High Street and the western site boundary.

Descriptor	Site Details
	<ul style="list-style-type: none"> ▪ DP644957 - A 4m wide easement to drain water to the section of the site outlined above. ▪ DP644957 - A 4m wide easement to flood limited by strata to the section of the site outlined above. ▪ L361810 - A restriction on the use of a small portion of land in the north-eastern corner of the site adjacent to the horse stabling yards. ▪ Lease to Australian Turf Club. ▪ Easement for electricity and other purposes ▪ DP1150063 - Right of carriageway on the north-eastern portion of the site providing access from the Spectator Precinct to Alison Road. ▪ DP1150063 - Easement for services to the section of the site outlined above. ▪ AG971515 and AG971801 – Caveat by Ausgrid. ▪ DP1258251 – Easement for electricity and other purposes 2m wide. ▪ DP1258251 – Right of carriageway (variable width). ▪ DP1276517 – Easement for electricity and other purposes 2, 4 and 4.275m wide and variable width. ▪ AU174032 – Easement for electricity and other purposes 2, 3.3, 4 and 4.275m wide and variable width (limited in stratum) ▪ AU174032 – Right of carriageway 3.66, 5 and 6m wide

Photos of the site are provided overleaf.

Figure 4 View of Racetrack and Spectator Precinct



Source: Urbis

Figure 5 View of patrons in Spectator Precinct on race day event



Source: ATC

Figure 6 Photos of the site



Picture 1 Spectator Precinct

Source: ATC



Picture 2 Racecourse main track and part of the Midfield and Infield precincts

Source: ATC



Picture 3 Infield car park

Source: Urbis



Picture 4 Infield grassed area

Source: Urbis



Picture 5 Multi-deck car park

Source: Mostyn Copper

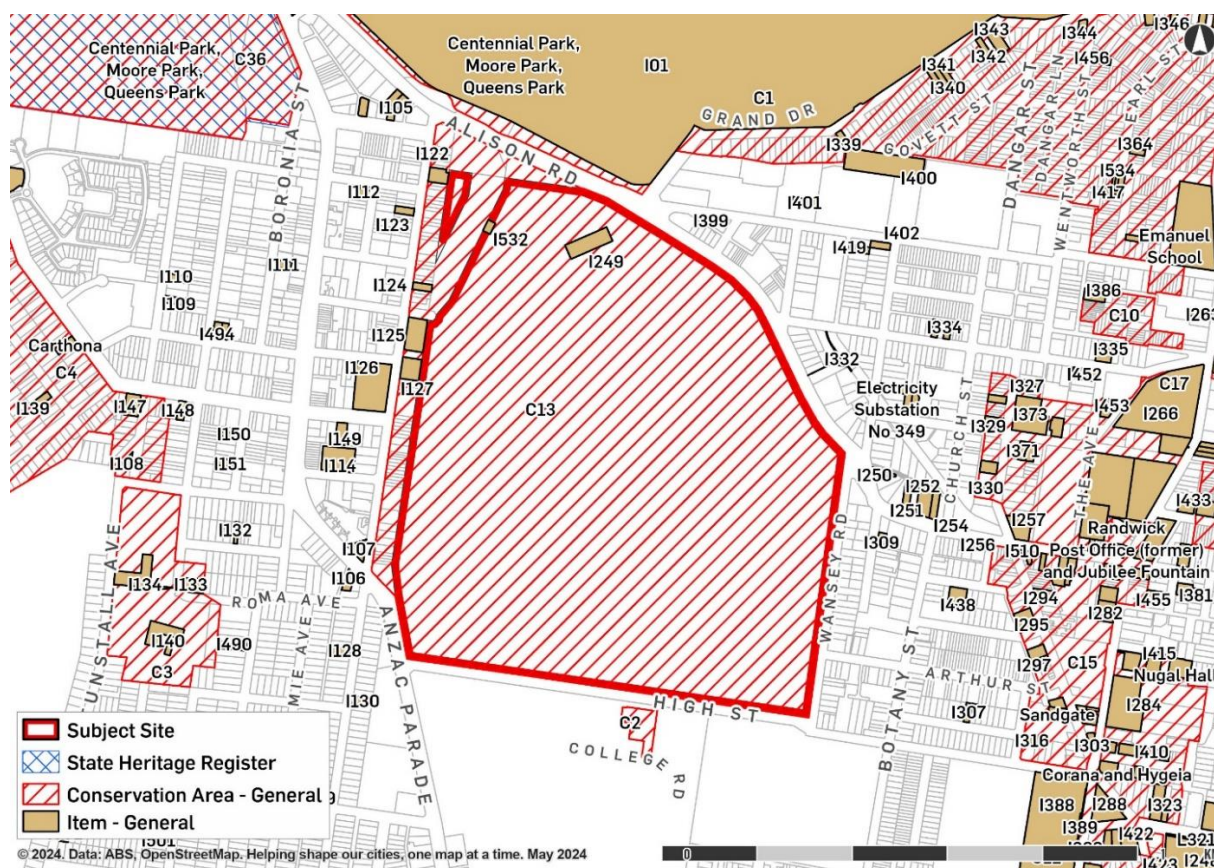
2.2.3. Heritage

The site is identified as containing heritage items and is located within a heritage conservation area under the Randwick LEP 2012. All items and areas of heritage significance are listed in **Table 6** and identified in the map provided in **Figure 7**.

Table 6 Heritage listing

Item No.	Item Name	Address	Significance
<u>Heritage Conservation Area</u>			
C13	Racecourse	77-97 Alison Road	Local
<u>Heritage Items</u>			
I249	Members’ Stand Official Stand, Royal Randwick	77-97 Alison Road	Local
I532	Tramway Turnstile Building Complex	77-97 Alison Road	Local
I01	Centennial Park	1R Oxford Street; 2R Darley Road; 1 Martin Road	State
I399	Federation Cottage	3 King Street	Local

Figure 7 Randwick LEP 2012 heritage map



Source: Urbis

2.2.4. Pedestrian and Road Network

The site is situated amongst a number of State and regional roads as follows:

- Alison Road and Anzac Parade are classified State Roads.
- Darley Road, Cowper Street and Doncaster Avenue are classified regional roads. Doncaster Avenue is significant as it is a regional road aligned parallel with Anzac Parade and provides the most direct access and egress point for the member's car park and taxi rank, via Gate 18 off Ascot Street.

The immediate locality of the Racecourse has well established pedestrian infrastructure. All local roads provide paved footpaths, lighting, and ancillary signage, as well as various crossings at key decision points, in the form of refuge islands, 'Zebra' crossings and signalised crossings.

A number of existing off-road cycle routes are also provided in the area, including along Anzac Parade, Alison Road, Wansey Road, Doncaster Avenue, and Darley Road, many of which have been upgraded as part of the Light Rail works package. These routes provide connectivity to the Randwick greater cycling network, and adjoining councils, providing direct linkages between the Racecourse and the greater Randwick area.

The location of key roads in proximity to the site is illustrated in **Figure 8**.

2.2.5. Public Transport

The site is well serviced by bus routes along Anzac Parade and Alison Road. Anzac Parade has a high frequency of services, which service surrounding suburbs and the University of NSW. It should be noted that at approximately 10pm (when the night racing is proposed to finish), bus service frequency is approximately every 10 - 20 minutes for services between Royal Randwick and Central Station.

Royal Randwick is also directly adjacent to the CBD and Southeast Light Rail (**Light Rail**). The site is serviced by three new Light Rail stations, one on Alison Road opposite the Gate 1 entry to the ATC Spectator Precinct, one on Wansey Road and one on the Kensington Line on Anzac Parade. This provides a high frequency service connecting key locations within the Sydney CBD, and links major recreation, education, commercial and residential areas between the Eastern Suburbs and Sydney CBD.

2.2.6. Site Accessibility

The site accommodates multiple access points as follows:

- **Gate 1**, Alison Road: Gate 1 is the primary pedestrian access point into the site and accommodates heavy pedestrian load on race days. During current day time events, this gate is not heavily utilised by vehicles, generally providing access for limited staff parking, servicing of the site (including for vehicles used for bump-in and bump-out of events) and restricted shuttle bus access. Gate 1 is the primary entrance/exit point for pedestrians moving between the site and the Light Rail stop on Alison Road.
- **Bus Layby**, Alison Road: Access to this layby is integrated into the signalised intersection of Alison Road and Darley Road. This layby is a drive-through arrangement (one-way) accommodating 11 bus stands and is the major drop-off hub and pick-up for public transport users.
- **Gate 10**, Wansey Road: is primarily used for float and other vehicle access to race-day stables, and rarely used during events. If required, it may serve as a secondary infield car park exit.
- **Gate 13**, High Street: Gate 13 is integrated into the signalised intersection between High Street and UNSW. This gate provides direct visitor (general admission and members) access to the infield car park located in the centre of the Royal Randwick Racecourse. This parking area accommodates approximately 3,500 spaces including approximately 600 formalised spaces on hardstand and 2,900 informal spaces on turf.
- **Gate 18**, Ascot Street / Doncaster Avenue: Gate 18 may be accessed via the roundabout intersection between Ascot Street and Doncaster Avenue, located towards the western side of the site. This gate currently provides access to the primary taxi (and car share) drop-off facility for events and is subject to heavy traffic volumes during typical event periods. The new multi-storey car park accommodates 574 spaces and is accessed via Gate 18.

- **Gate A, B:** Internal gates to provide members (Gate A) and public (Gate B) pedestrian access to the bus layby adjacent to Alison Road.
- **Gate C, D:** Internal gates to provide members (Gate C) and public (Gate D) pedestrian access to the internal roadway known as “Member’s Drive”.

The site is approximately 500 metres from the closest bus stops along Anzac Parade and Alison Road. Anzac Parade has a high frequency of services, which service surrounding suburbs and the University of NSW, as well as connecting to the Sydney CBD.

In addition, the site is in direct proximity to the Light Rail infrastructure. Access to the Racecourse is available from surrounding Light Rail stations including the Royal Randwick Racecourse stop (located on the northern side of Alison Road, opposite Gate 1), Wansey Road and UNSW High Street (to the east of the Racecourse), and Kensington and ES Marks (to the west of the Racecourse, adjacent to Doncaster Avenue).

The completion of the Light Rail has significantly improved public transport in the precinct, linking major recreation, education, commercial and residential areas between the Eastern Suburbs and Sydney CBD.

The location of public transport infrastructure and site entry points is illustrated in **Figure 8**.

Figure 8 Public transport access, key roads and pedestrian entry map



Source: Urbis

2.3. Strategic Context

The site is strategically located within the Eastern City District and the Randwick Collaboration Area. Specifically, the Randwick Local Strategic Planning Statement recognises the Racecourse as follows:

The Randwick Collaboration Area structure plan also recognises the importance of the Royal Randwick Racecourse and Centennial Parklands as an iconic open space, recreational and tourist hub for the City and the need for future planning to support the ongoing function of these important recreational destinations...

The Royal Randwick Racecourse is an important cultural and tourist destination within Randwick attracting over 1.2 million visitors (including non-race day events) per year.

The proposed development responds directly to the strategic importance of the site within NSW and the need to build the NSW visitor economy and increased participation in cultural and recreational events. The alignment of the proposal with key State, district and local strategic plans and policies is outlined in **Table 6**.

Table 7 Alignment with strategic planning policy

Policy	Objective	Alignment
NSW Visitor Economy Strategy 2030	The objective of the strategy is to triple 2009 overnight visitor expenditure in NSW by 2030 to achieve increased demand to visit Sydney and NSW.	<p>The proposal will directly respond to the NSW Visitor Economy Strategy 2030's objectives through private sector investment in a cultural destination.</p> <p>The proposal to accommodate non-race day events of 5,000 – 15,000 patrons (at any one time) at an established recreation site aligns with the intent of the strategy to promote Sydney and NSW as a premier visitor destination.</p> <p>The proposal will result in ongoing job creation in the visitor sectors, attraction of domestic and international cultural events, and use of the site's existing infrastructure which is developed specifically to support large events on the site. The Economic Impact Assessment prepared by Urbis estimates the proposal will generate \$19 million gross value add annually, which will contribute to the objectives to increase productivity of events in Sydney.</p>
NSW Arts and Cultural Policy Framework	The Framework seeks to grow a thriving, globally connected arts and cultural sector with and for the people of NSW.	<p>The proposal will provide renewed access to an existing major recreational venue in Sydney through permitting additional non-race day events on the site. The proposal will utilise the existing infrastructure, management practices and reputation of the Racecourse to support these events.</p> <p>This aligns with the Framework's objective to improve access to the arts and builds upon the State's national and international reputation through partnering with private sector opportunities. The proposal will support NSW as a thriving visitor economy and activate the Racecourse outside of race-day activities.</p>

Policy	Objective	Alignment
Greater Sydney Region Plan and Eastern District Plan	<p>The District Plan contains strategic directions, planning priorities and actions that seek to implement the objectives and strategies within the Region Plan at the district-level.</p> <p>The Structure Plan identifies the key centres, economic and employment locations, land release and urban renewal areas and existing and future transport infrastructure to deliver growth aspirations.</p>	<p>The proposal aligns directly with the vision of the Greater Sydney region as a “<i>city for people... with great places that keep bring people together</i>”. The proposal aligns with the key directions of the Region Plan and the District Plan as:</p> <ul style="list-style-type: none"> ▪ The proposed development maximises the utility of the existing transport infrastructure in the southeastern CBD. ▪ The proposal will create opportunities to expand Sydney’s artistic and cultural framework and will lead to national and international investment in Sydney. ▪ The proposal will contribute to Sydney’s vibrant night-time economy and will draw international attention, enhancing Greater Sydney’s standing as a global city and boosting the Randwick local economy. ▪ Randwick is identified as a Strategic Centre in the Greater Sydney Regional Plan. The proposal will support productivity of the strategic centre through the direct and indirect benefits to the local economy. The Economic Impact Assessment prepared by Urbis estimates the proposal will generate 107 ongoing direct jobs and 37 ongoing indirect jobs. ▪ The proposal is within an established recreation facility that accommodates major events and as such environmental impacts can be mitigated.
Future Transport Strategy 2056	<p>The Strategy seeks to prioritise public transport to reduce the number of private vehicle trips and improve the liveability and vibrancy of communities.</p>	<p>A key component of the access strategy for the proposal is use of the Light Rail and the surrounding Royal Randwick, ES Marks and Wansey Road stations. This is incentivised through measures outlined in the Traffic Report and will reduce reliance on private car use.</p> <p>The Light Rail has been designed to manage large crowds due to its proximity to the Royal Randwick Racecourse and other major sporting and recreational facilities. The ATC have an existing relationship with the light rail operator which enables provision of increased service frequency for major events which provides capacity for up to 10,000 patrons per hour per direction, in addition to regular light rail users. The</p>

Policy	Objective	Alignment
		ATC will consult with the light rail operator prior to events occurring to ensure sufficient light rail capacity is available.
Randwick Local Strategic Planning Statement	<p>The Randwick LSPS guides the vision and future growth across the LGA.</p> <p>The LSPS identifies the Racecourse as an iconic open space and recreational and tourism hub.</p>	<p>The LSPS implements the directions of the District Plan as it relates to the LGA and as per the assessment outlined in this table, the proposal aligns with the LSPS. In addition, it is noted:</p> <ul style="list-style-type: none"> ▪ The proposal will increase the utilisation of the existing assets and strengthen the role it plays in contributing to the tourism economy in Randwick, Sydney, and in NSW post-COVID, and as such aligns with the LSPS and the Randwick Economic Development Strategy. ▪ The establishment of the proposal will reinforce Randwick as an internationally recognised venue for years to come. ▪ Non-race day events are anticipated to create more employment opportunities and activity in hospitality and retail within the site and the surrounding area. ▪ Non-race day events will use existing infrastructure on the site and as such will not increase use and consumption of resources. Temporary generators will be employed if required. Details of environmentally sustainable design measures are outlined in Section 6.8, and the ESD Report at Appendix BB. ▪ Ongoing consultation with Council and the local community has occurred during the preparation of this proposal. This includes meetings, correspondence and consultation sessions to ensure the community have been informed and involved in the process as outlined in Section 5.

2.4. Feasible Alternatives

Section 192(c) of the Regulation requires an analysis of any feasible alternatives to the proposed development, including the consequences of not carrying out the development.

The ATC identified a number of project alternatives which were considered in respect to the identified need for the accommodation of non-race day activities. Each of these options is listed and discussed in the following table.

Table 8 Analysis of alternatives

Descriptor	Site Details
Do Nothing	<p>The 'Do Nothing' option – to not develop the site – is not a medium- or long-term feasible option for the site due to:</p> <ul style="list-style-type: none"> ▪ The existing MP10_0097 MOD1 and MOD2 does not permit events greater than 5,000 patrons. Consultation with event coordinators indicates a greater level of patron capacity is required for commercial viability and event diversification, without which coordinators will utilise alternative venues within the Greater Sydney region. ▪ The current approvals for non-race day events up to 5,000 patrons will result in a loss of economic activity and positive externalities in the Randwick LGA. It is further noted that whilst the project seeks a notable increase in patron capacity, the site is designed and constructed to accommodate crowds of up to 55,000 people. ▪ Use of the site only for racing events results in the loss of a number of opportunities for non-race day events. The ATC has demonstrated previously that they have the capability to successfully deliver major race day and non-race day events at the Racecourse. This is an efficient use of the land.
Individual DAs	<p>The current practice of obtaining separate SSD approvals for each non race day events greater than 5,000 patrons is a timely and cost-consuming process. It is an inefficient use of ATC and DPHI resources. This approval will alleviate the need for continued SSDAs for non race day events being sought from DPHI. This approval will allow ATC to be agile to respond to market opportunities for non-race day events and the approval will create greater certainty for the community when events are approved, rather them being approved on an ad hoc basis.</p>
Alternative proposal	<p>Other locations within the site to host the event (such as the Services Precinct and Stables Precinct) were not considered as these areas are not suitable for accommodating up to 15,000 patrons and would cause disruption to existing horses on site and service areas.</p>
The proposal	<p>The proposal for non-race day events between 5,000 – 15,000 patrons (at any one time) for 10 events per year (up to a maximum of three days per event) will utilise and promote Randwick Racecourse as a location for premium cultural, corporate, consumer and festival events other than just premium sporting events. The multi-purpose use of the site is in aligned with Randwick LSPS and will enable the use and enjoyment of the private open space site by a wide spectrum of the community. The application is particularly important in a post-COVID era to stimulate economic activity and provide safe outdoor events for the broader community.</p>

3. Project Description

3.1. Project Summary

This application seeks approval for the use of land and buildings within the Spectator Precinct of the Royal Randwick Racecourse for various non-race day events. The proposal will accommodate between 5,000 – 15,000 patrons (at any one time) for 10 events per year (up to a maximum of three days per event).

The accommodation of non-race day events on the site is consistent with the historical use of the site as a *recreation facility (major)* and the broader event character of the site. The site has accommodated a number of non-race day events under previous approvals, and this application seeks to continue the ongoing use of the site for this purpose. The key components of the development are outlined in **Table 9**.

Table 9 Main components of the project

Parameter	Description
Location	Events will be held in the Spectator Precinct, with parking in the Infield Precinct.
Number of events	<p>10 per annum, commencing from Q2 2025.</p> <p>There is no change to the existing number of race day events held per annum (currently 45 races per year). The non-race day events will be in addition to race day as the core use of the site as a horse racing facility.</p> <p>The operation of events and the service of alcohol protocols are to be consistent with the Non-Race Day Plan of Management.</p>
Patronage	<p>5,000 – 15,000 (at any point in time per day)</p> <p>Non-race day events of a patronage capacity of less than 5,000 patrons are already permitted via Schedule 2 of the <i>Randwick Local Environmental Plan 2012</i> and development consent MP10_0097 MOD 2.</p>
Hours of operation	<p>Event hours:</p> <ul style="list-style-type: none"> Monday – Thursday: 10am – 8pm Friday, Saturday, Sunday or public holiday: 10am – 10:30pm <p>Bump in and bump out may occur between 6am – 1am the following day for a maximum of 10 days prior to and following the event. Bump in and bump out activities are operations conducted for the preparation, setup, removal or disassembly of the event.</p> <p>Works will only be undertaken outside of these hours if required in an emergency to avoid the loss of life, damage to property, prevent traffic conflicts and / or prevent environmental harm.</p>
Type of events	Non-race day events may include (but not limited to) a range of community events, private and corporate events/functions, festivals, cultural / art events, markets, and consumer roadshows.
Event duration	The duration of events will be between 1 – 3 days (consecutive days). No event will continue for more than a consecutive 3-day period (excluding bump-in and bump-out procedures).

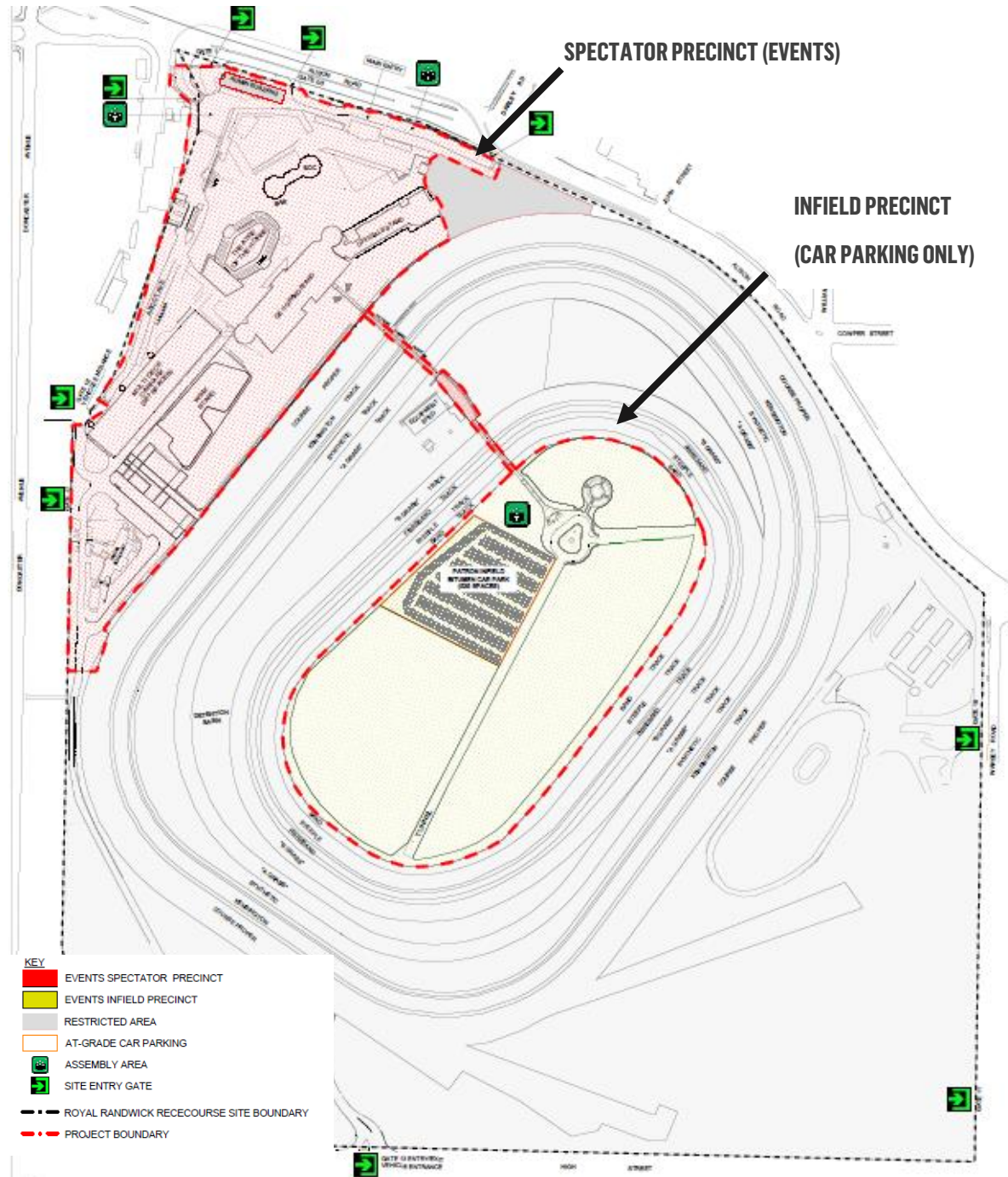
Parameter	Description
Temporary structures	<p>The proposal involves the erection of ancillary temporary structures including stages, marquees, screens, amenities, and lighting poles to support the non-race day events.</p> <p>A potential layout of temporary structures to support a non-race day event in the Spectator Precinct is illustrated in the Technical Layout Plan prepared by MI Event Consultants at Appendix F. This is for <u>information purposes only</u> and represents a potential 'worst case' scenario.</p>
Access and parking	<p>The proposal will use the following existing access points:</p> <ul style="list-style-type: none"> ▪ Gate 1 (Alison Road) ▪ Gate 10 (Wansey Road) ▪ Gate 18 (Doncaster Avenue) ▪ Gate 6 / 7 (Alison Road and Darley Road intersection) ▪ Gate 13 (High Street) <p>Use of existing parking facilities on site:</p> <ul style="list-style-type: none"> ▪ Multi-deck car park: 574 spaces ▪ Infield car park: 3,500 spaces <p>The multi-deck car park accommodates sufficient capacity to allow both events to be held on the ground level of the car park and for parking in the upper levels. Event personnel will be employed on site in the car park to manage pedestrian conflict.</p> <p>Patrons will be encouraged to utilise public transport and active transport for access to and from events.</p>
Infrastructure and utilities	<p>Infrastructure requirements will depend on the type, size and nature of the event. Based on the Technical Layout Plan (Appendix F). A 'worst case' scenario involving a music festival with 15,000 patrons and use of all onsite parking could include use of:</p> <ul style="list-style-type: none"> ▪ one 18kVA temporary diesel generator, <i>or</i> ▪ two 92kVA temporary generators (depending upon event requirements), and ▪ temporary distribution board at each stage (three in total). <p>No permanent infrastructure is required to facilitate the proposal. Existing precinct lighting will be used for patron safety.</p>
Employment and economic generation	<p>\$19 million gross value add (GVA) annually</p> <p>107 ongoing direct jobs and 37 ongoing indirect jobs per annum</p>
EDC	\$7,311,842 (excluding GST)

3.2. Detailed Description

3.2.1. Event Location

Events will be accommodated within the land and buildings of the Spectator Precinct as illustrated in the Site Plan at **Appendix E**. Existing at-grade car parking within the Infield Precinct will be used to support events on the site. An extract is provided in **Figure 9**. The detailed layout and site design within these precincts will vary depending upon the type of event and event operator.

Figure 9 Extract of site and event area plan



Source: MI Global

Events are not permitted within the Stables Precinct on the south-eastern corner of the site. However, pedestrian, vehicular and emergency access routes to activated areas are provided through this precinct from High Street and Wansey Road.

3.2.2. Event Management

A draft OMP has been prepared to outline the intended management and operation of the non-race day events on the site at **Appendix G**. The draft OMP is supplemented by the following:

- Traffic Management Plan,
- Waste Management Plan,
- Noise Management Plan;
- Alcohol Management Plan,
- Security Management Plan,
- Consultation Plan, and
- Draft Emergency Evacuation Plan.

Further discussion of measures proposed to manage events is outlined in **Section 6.3**.

All events will be managed through a key stakeholder group who will be formed to oversee the environmental performance of events under the consent. This will include key representatives from ATC, TfNSW, NSW Police and Moore Park Event Operations Group (MEOG). Any event will also be discussed with MEOG (an established group) to avoid any conflicting scheduling of major events in the Moore Park area.

3.2.3. Temporary Structures

The proposal involves the erection of ancillary temporary structures including stages, marquees, amenities, and stage lighting to support the non-race day events.

The erection of temporary structures can be undertaken as exempt development in accordance with Division 3 of the *State Environmental Planning Policy (Exempt and Complying Development Codes) 2008 (Codes SEPP)*. However, consent for structures is sought under this approval as the floor area of marquees will exceed the maximum 300sqm development standard under section 2.118 of the Codes SEPP.

Consistent with historical approval of non-race day events on the site (refer **Condition C8 of SSD-6134**), it is proposed that consent for all temporary structures to be erected within the Spectator Precinct (**Figure 9**) is granted under this application. This will provide adequate flexibility for the event operators and range of non-race events sought under this approval.

In accordance with Clause 69(1) of the EP&A Regulations, temporary structures used as an entertainment venue will comply with the National Construction Code (NCC) Part B1 (structural provisions) and NSW Part H102 (temporary structures used as entertainment venues).

3.2.3.1. Indicative Structures Plan

An indicative layout of temporary structures is illustrated in the Technical Layout Plan at **Appendix F**. This is for information purposes only and represents a potential 'worst case' scenario of an event on the site to enable an assessment of environmental impacts.

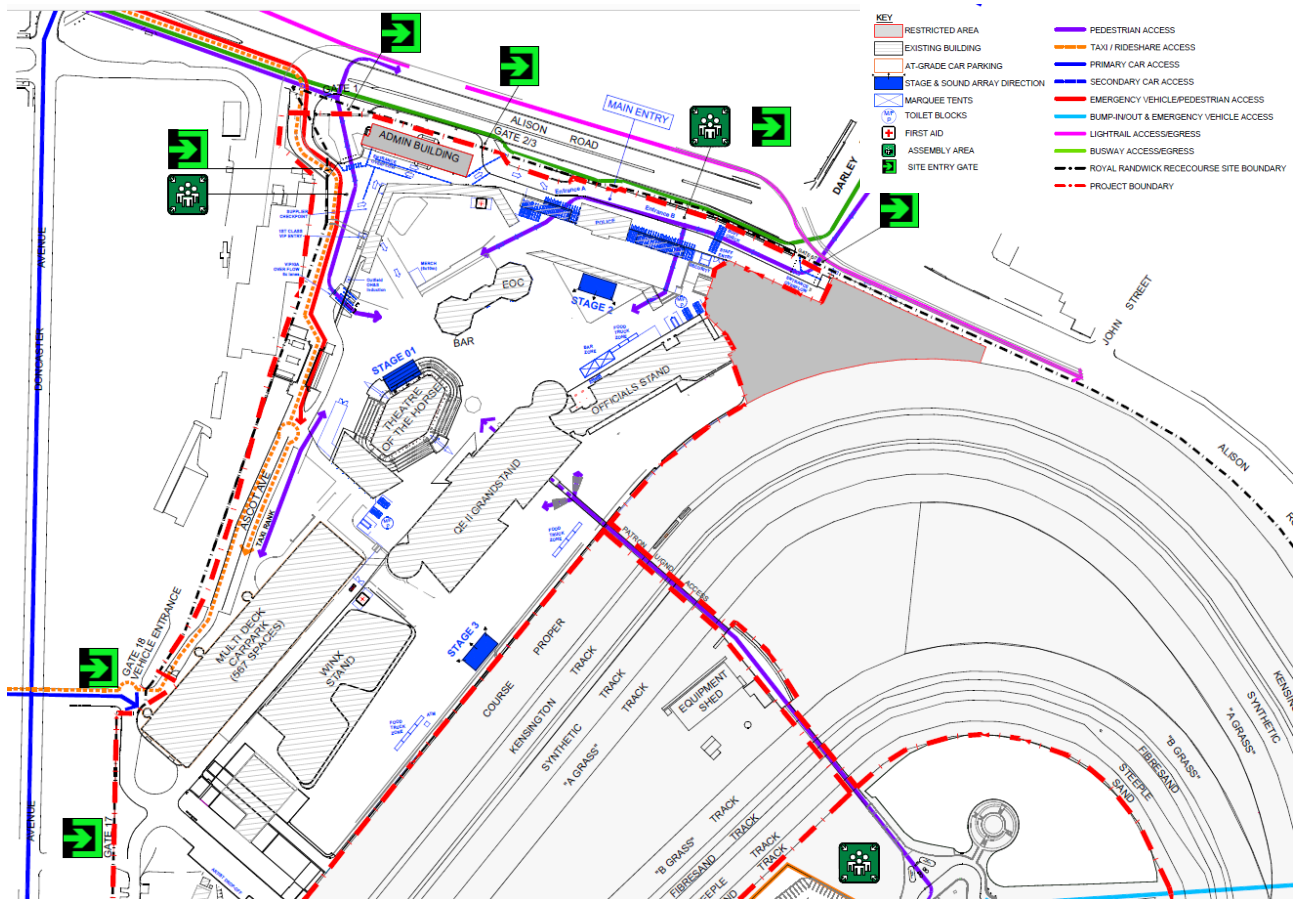
The specific layout and type of temporary structures will be determined by the event type and operator, and the Layout Plan is for information purposes only.

The scenario modelled is for a music festival event within the Spectator Precinct and includes the following:

- three stages with a maximum height of 6.5m and area of 207sqm and associated stage lighting
- marquees with a maximum height of 6.5m and area of 207sqm used for food and bar servicing
- various food trucks throughout the site
- security, merchandise and ticketing administration marquees
- first aid areas

- artist back of house areas
- amenities
- market tents within the ground floor of the multi-deck car park building (internal to building).

Figure 10 Extract of Spectator Precinct structures plan



Source: MI Event

3.2.4. Infrastructure and Utility Supply

Non race day events on the site will primarily utilise existing site infrastructure and utilities. The site is an established event precinct and accommodates a race day events up to 50,000 patrons. As such, this existing infrastructure will be sufficient for the use of the site for similar non-race day events up to 15,000 patrons.

The Infrastructure Report prepared by IGS at **Appendix V** identifies that at a worst-case scenario for a music festival in the Spectator Precinct (refer layout extract in **Figure 10**), the following temporary electrical utilities would be required to support events:

- one 18kVA temporary diesel generator, or
- two 92kVA temporary generators (depending upon event requirements), and
- temporary distribution board at each stage (three in total).

No permanent infrastructure is required to facilitate the proposal.

Existing lighting in the Spectator Precinct will be used for patron safety and where require additional temporary lighting may be provided on site by the event operator.

4. Statutory Context

4.1. Statutory Requirements

Identification of the relevant statutory planning policies applying to the proposal is outlined in **Table 9**.

Table 10 Identification of Statutory Requirements for the Project

Matter	Guidance
Power to grant consent	<p>This development is proposed under Part 4 of the Act, Division 4.1 State significant development, Section 4.38.</p> <p>In accordance with clause 4 of schedule 2 of the Planning Systems SEPP, development for the purposes of non-race day events at the Royal Randwick Racecourse is assessed as SSD:</p> <p><i>4 Development at Royal Randwick Racecourse</i></p> <p><i>Development on land identified as being within the Royal Randwick Racecourse Site on the State Significant Development Sites Map if—</i></p> <p><i>(a) it has a capital investment value of more than \$10 million, or</i></p> <p><i>(b) it is for the purposes of an event that is not a race day event.</i></p> <p>(emphasis added)</p> <p>The Minister is the consent authority for SSDA. The Minister may delegate this function to staff within the DPHI. The IPC will be the consent authority in the following circumstances:</p> <ul style="list-style-type: none"> ▪ The application is not supported by the relevant Council; ▪ The DPHI has received more than 50 unique public objections. <p>The ATC has not made a political donation in connection with the SSDA.</p>
Permissibility	<p>The Randwick LEP 2012 is the principal environmental planning instrument applying to the site. The site is zoned RE1 – Public Recreation under the Randwick LEP 2012.</p> <p>The application seeks consent for non-race day events on the site and ancillary structures, which will support the ongoing use of the site as a '<i>recreation facilities (major)</i>'. This is permitted with consent in the RE1 zone.</p>
Other approvals	<p>Clause 7.9 of the <i>Biodiversity Conservation Act 2016</i> applies to SSD applications and requires SSD applications to be accompanied by a Biodiversity Development Assessment Report (BDAR) unless it is determined the proposal is not likely to have any significant impact on biodiversity values.</p> <p>A BDAR Waiver Request prepared by Cumberland Ecology was submitted to the DPHI in October 2023, outlining an assessment of the proposed works against the eight biodiversity values as defined in Section 1.5 of the <i>Biodiversity Conservation Act 2016</i> and clause 1.4 and clause 6.1 of the <i>Biodiversity Conservation Regulation 2017</i>. On 17 November 2023, DPHI determined development is not likely to have any significant impact on biodiversity values and confirmed a BDAR is not required</p>

Matter	Guidance
	<p>to accompany any application for development consent. The BDAR Waiver is provided at Appendix M.</p> <p>Part 6 of the <i>National Parks and Wildlife Act 1974</i> and Part 5 of the <i>National Parks and Wildlife Regulation 2019</i> outlines the process for preparation of a cultural heritage assessment report.</p> <p>On 4 October 2022, Heritage NSW confirmed via email that it is appropriate to amend the standard SEARs for SSD-11973381 to reflect that an Aboriginal Cultural Heritage Assessment Report (ACHAR) is not required. The advice was provided based on the following reasons:</p> <ul style="list-style-type: none"> ▪ Numerous archaeological investigations, including test excavations, have already been undertaken within the subject area and surrounding landscape. ▪ Urbis' desk top assessment based on these assessments concluded that no landscape features/deposits associated with potential for Aboriginal objects will be impacted by the proposed works. ▪ The area of the Randwick Racecourse has been subject to significant ground disturbing activities since at least the 1830s and test excavations have identified approximately 1.1m to 3m of fill covering the deeper natural dune deposit. ▪ The proposed works will not result in any ground disturbance that could impact Aboriginal objects beneath the fill. ▪ The current proposal will not result in any significant ground disturbance activities because it will use a combination of existing infrastructure and temporary marquees and/or stalls. <p>Evidence of the consultation is appended to the Aboriginal Due Diligence Report at Appendix Q.</p> <p>The site is not identified as bushfire prone land and as such there is no further approval required under the <i>Rural Fires Act 1977</i>.</p> <p>The operation of events will occur in accordance with the relevant requirements of the ATC liquor license and the <i>Liquor Act 2007</i>.</p>

4.2. Pre-Conditions

Table 11 outlines the pre-conditions to exercising the power to grant approval.

Table 11 Pre-Conditions

Statutory Reference	Pre-condition	Relevance	Section in EIS
EP&A Regulation	<p>Part 8 – Infrastructure and environmental impact assessment</p> <p>An environmental impact statement must be prepared in</p>	<p>This EIS has been prepared in accordance with Part 8 of the EP&A Regulations. This EIS addresses the SEARs issued by</p>	Signed Declaration

Statutory Reference	Pre-condition	Relevance	Section in EIS
	accordance with the SEARs issued for the project, and contain the relevant information identified in section 190 and 192 of the EP&A Regulations.	<p>the Secretary as part section 175 of the EP&A Regulations and contains the detailed information identified in section 190 and 192 of the EP&A Regulations.</p> <p>Specifically, this includes a statement confirming the EIS has been prepared in accordance with the EP&A Regulation provided by a REAP. The development is consistent with the principles of ecologically sustainable development as per section 193 of the EP&A Regulations as discussed in Section 6.8.</p> <p>This application will be placed on public exhibition on the NSW Major Projects Portal.</p>	SEARs Compliance Appendix A
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	<p>Section 4.6 – Contamination and remediation to be considered in determining development application</p> <p>A consent authority must not consent to the carrying out of any development on land unless it has considered whether the land is contaminated, if it is satisfied the land is suitable in its contaminated state, or the land will be suitable, after remediation, for the purpose for which the development is proposed to be carried out.</p>	<p>This SSDA does not propose any significant ground disturbance to the Racecourse, construction of permanent large structures or change in use which would pose an environmental impact or require remediation on site. It is for the continued use of the site as a recreational facility.</p> <p>A Preliminary Site Investigation (PSI) prepared by Douglas Partners prepared to support the Spectator Precinct approval (MP10_0097) is appended to this EIS. The PSI was prepared for the entire Spectator Precinct and confirms the site has a low potential for contamination due to the historical use of the site as a Racecourse since 1883 and field observations. The PSI notes a small area of asbestos contaminated fill in the precinct.</p> <p>Subsequent to this, an Environmental Management Plan</p>	<p>Preliminary Site Investigation Appendix O</p> <p>Environmental Management Plan Appendix AA</p>

Statutory Reference	Pre-condition	Relevance	Section in EIS
		(July 2013) for the Spectator Precinct was prepared by Douglas Partners outlined the requirements for managing capped, contaminated fill at the site under normal commercial usage. This is provided at Appendix AA.	
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	<p>Section 2.122 – Traffic generating development</p> <p>A consent authority must give written notice to TfNSW within 7 days after the application is made.</p>	<p>The proposal is subject to this section as it is ‘traffic generating development’ under Schedule 3 of the T&I SEPP as the proposed worst-case event of a maximum of 15,000 people will generate more than 200 motor vehicles per hour.</p> <p>The SSDA will be referred to TfNSW for comment.</p>	N/A
	<p>Section 2.98 – Traffic generating development</p> <p>A consent authority must give written notice to the rail authority for the rail corridor within 7 days after the application is made.</p>	<p>The proposal is subject to this section as it is located adjacent to the light rail corridor.</p> <p>The SSDA will be referred to Transdev Sydney Light Rail for comment.</p>	N/A
<i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>	<p>Section 3.2</p> <p>Development consent must not be granted to non-residential development unless the consent authority is satisfied the embodied emissions attributable to the development have been quantified.</p>	<p>The application is for non-residential development and the works have an EDC of \$7,311,842. Whilst no permanent building works are proposed, temporary structures, which is a type of building, are proposed to be erected to support the non-race day events. The structures will be dismantled within 10 days following the conclusion of the event.</p> <p>JHA have prepared an Embodied Emissions Form to quantify the emissions generated from the temporary structures. In the accompanying ESD Report, JHA note the nature of the NRDE and temporary structures (which differ</p>	<p>ESD Report Appendix BB</p> <p>Embodied Emissions Form Appendix CC</p>

Statutory Reference	Pre-condition	Relevance	Section in EIS
		significantly from the types of materials requested in the form) have been considered when completing the NABERS Embodied Emissions Material form. The material quantities and costs have been included within the most relevant/applicable field of the form, with comments provided to describe the elements.	
<i>Randwick Local Environmental Plan 2012</i>	<p>Clause 5.21 – Flood planning</p> <p>Development consent must not be granted to development unless a consent authority is satisfied the development is compatible with the flood function and behaviour of the land, will not adversely affect flood behaviour or the safe occupation and evacuation from the site, will not adversely affect the environment, and incorporates measures to manage risk to life in the event of a flood.</p>	<p>This SSDA does not propose any physical building work or amendment to existing stormwater structures. A Flood Impact Assessment has been prepared by GRC Hydro and identifies the site is subject to flash flooding with minimal warning sign. For patrons of events that are unaware of a flash flood may be unlikely to find a safe vehicle evacuation route from the site with dangers of being caught in hazardous floodwater. As such, a 'shelter in place' strategy within the Spectator Precinct is outlined within the Emergency Management Plan to manage risk to life in the event of a flood.</p>	<p>Section 6.6</p> <p>Flood Report Appendix S</p> <p>Flood Emergency Management Plan Appendix T</p>
	<p>Clause 6.10 – Essential Services</p> <p>Development consent must not be granted to development unless the consent authority is satisfied that any of the following services that are essential for the development are available or that adequate arrangements have been made to make them available when required.</p>	<p>The site typically accommodates large events for race day and non-race day activities and as such currently has adequate infrastructure and services on site. In a worst-case scenario of a music festival of 15,000 patrons, temporary generators may be required to provide a secondary energy supply on site as identified in the IGS Infrastructure Statement. If required, event operators will install temporary generators in the bump-in period</p>	<p>Infrastructure Statement Appendix V</p>

Statutory Reference	Pre-condition	Relevance	Section in EIS
		to ensure adequate services to events.	
	<p>Clause 6.12 – Development requiring the preparation of a development control plan</p> <p>Development consent must not be granted to development unless guidelines and controls apply to the site.</p>	The development is consistent with the site-specific provisions contained in Part E of the Randwick Development Control Plan 2013.	Statutory Compliance Appendix B

4.3. Mandatory Considerations

Table 12 outlines the relevant mandatory considerations to exercising the power to grant approval and the section where these matters are addressed within the EIS.

Table 12 Mandatory Consideration

Statutory Reference	Mandatory Consideration	Section in EIS
Consideration under the EP&A Act and Regulation		
Section 1.3	Relevant objects of the EP&A Act	Statutory Compliance Appendix B
Section 4.15	Relevant environmental planning instrument: <ul style="list-style-type: none"> Planning Systems SEPP Resilience and Hazards SEPP Transport and Infrastructure SEPP Sustainable Buildings SEPP Randwick LEP 2012 	Statutory Compliance Appendix B
	Relevant draft environmental planning instruments	N/A
	Relevant planning agreement or draft planning agreement	N/A
	Development control plans: <ul style="list-style-type: none"> Randwick Development Control Plan 2013 	Statutory Compliance Appendix B
	The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.	Section 6

Statutory Reference	Mandatory Consideration	Section in EIS
	The suitability of the site for the development	Statutory Compliance Appendix B
	The public interest	Statutory Compliance Appendix B
Mandatory relevant considerations under EPIs		
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	<p>Section 2.122 – Traffic generating development</p> <p>The consent authority must consider a response received from TfNSW, and:</p> <p>(ii) the accessibility of the site concerned, including—</p> <p>(A) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and</p> <p>(B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and</p> <p>(iii) any potential traffic safety, road congestion or parking implications of the development.</p>	Statutory Compliance Appendix B Section 6.4
	<p>Section 2.98 – Traffic generating development</p> <p>The consent authority must consider a response received from the rail authority and any guidelines that are issued by the Planning Secretary for the purposes of this section.</p>	Statutory Compliance Appendix B Section 6.4
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	<p>Section 3.12 – Potentially hazardous industry matters for consideration</p> <p>The consent authority must consider the matters for consideration outlined in section 3.12 for hazardous or offensive development.</p>	Statutory Compliance Appendix B Section 6.1.3
<i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>	<p>Section 3.2</p> <p>In deciding whether to grant development consent to non-residential development, the consent authority must consider whether the development is designed to enable the following—</p> <p>(a) the minimisation of waste from associated demolition and construction, including by the choice and reuse of building materials,</p>	ESD Report Appendix BB Embodied Emissions Form Appendix CC

Statutory Reference	Mandatory Consideration	Section in EIS
	(b) a reduction in peak demand for electricity, including through the use of energy efficient technology, (c) a reduction in the reliance on artificial lighting and mechanical heating and cooling through passive design, (d) the generation and storage of renewable energy, (e) the metering and monitoring of energy consumption, (f) the minimisation of the consumption of potable water.	
Randwick LEP 2012	Clause 2.3 – Zoning	Statutory Compliance Appendix B
	Clause 5.10 – Heritage Conservation	Statutory Compliance Appendix B Heritage Impact Statement Appendix P
Development Control Plans		
Development Control Plan	Section 2.10 of the Planning Systems SEPP states that development control plans (whether made before or after the commencement of this Policy) do not apply to SSD. Notwithstanding this, an assessment of the following relevant provisions of the Randwick Development Control Plan 2013 (the DCP) has been undertaken: <ul style="list-style-type: none"> ▪ Section B2: Heritage ▪ Section E3: Royal Randwick Racecourse ▪ Section F1: Development in Recreation Zones 	Statutory Compliance Appendix B
Randwick City Council Section 94A Development Contributions Plan 2014		
Section 7	The SSDA relates to the ongoing use of the site for events. Development contributions do not apply under the relevant contributions plan.	N/A

5. Engagement

The following sections of the report describe the engagement activities that have been undertaken during the preparation of the EIS and the community engagement which will be carried out if the project is approved.

A complete summary of these activities is provided in the Consultation Outcomes Report prepared by Urbis Engagement at **Appendix Z**.

5.1. Engagement Carried Out

Stakeholder engagement has been undertaken by the applicant in the preparation of the SSDA in accordance with the SEARs requirements and the DPHI *Undertaking Engagement Guidelines for State Significant Projects*. Engagement has been carried out with the stakeholder groups illustrated in **Figure 11**.

Figure 11 Stakeholder groups engaged with during pre-lodgement consultation



Source: Urbis Engagement

The following engagement activities were undertaken to provide information about what's being proposed, the key considerations of the project, the planning process, relevant applicant details, and to obtain feedback from the community.

- Consultation with DPHI, Council and Government agencies via email and meetings.
- Door knock to properties along the eastern side of Doncaster Avenue (immediately adjoining Royal Randwick) on 13 June 2024.
- Distribution of a community newsletter to 11,315 properties illustrated in 'purple' in **Figure 12** on 13 June 2024.

Figure 12 Area of newsletter drop



Source: Urbis Engagement

- Distribution of community newsletter via email to Council and elected representatives and industry groups identified in **Figure 11**.
- Development of a dedicated project page on the ATC website on 13 June 2024 (www.australianurfclub.com.au/royal-randwick-nonraceday-proposal/).
- A drop-in session on 27 June 2024 at the Royal Randwick Racecourse.
- Establishment of an 1800 community phone line and email address, managed by Urbis Engagement.
- Publish of an online survey to collect community feedback.

5.2. Community Views

Urbis Engagement has identified five (5) key themes of feedback that emerged throughout the engagement process with the community. The themes were consistent across all engagement channels and include:

- Management of anti-social behaviour and crowd control
- Noise impacts
- Traffic impacts
- Ongoing consultation and communication
- General support for the proposal, particularly the diversification of Royal Randwick's use.

A detailed summary of the issues raised within these themes and a response to each item raised is provided in the Consultation Outcomes Report prepared by Urbis Engagement at **Appendix Z**.

5.3. Agency Views

The proponent and project consultants have consulted with the relevant government agencies outlined in the following table.

Table 13 Overview of agency consultation

Agency Stakeholder	Consultation
DPHI (Planning and Assessment Team)	<ul style="list-style-type: none">▪ On 8 December 2020, a request for SEARs was submitted by Urbis Planning to DPHI. SEARs for SSD-11973381 were issued on 24 December 2020.▪ On 24 March 2022, Mostyn Copper and Urbis Planning met with DPHI to discuss the former proposal of events with patronage of between 5,000 patrons - 50,000 patrons. The discussion focused upon the proposed approach to address the site layout/design. The following feedback was provided. Whilst this feedback is not directly relevant to this proposal (due to the significant reduction in project scope from maximum 50,000 patron events to 15,000 patron events), it has been considered in the preparation of this SSDA<ul style="list-style-type: none">- As Royal Randwick is an urban site with close residential neighbours, ATC will need to provide some definitions and parameters of the temporary infrastructure to be provided each event. This is provided in Section 3.- The importance of detailing orientation of temporary structures given the potential acoustic impacts was noted. This is provided in Section 3 and Section 6.2.- DPHI suggested a likely layout of the event structures/stages should be defined, with flexibility for the operator to fit within parameters based on preference. This is adopted in the proposal.- DPHI noted the ability to erect temporary structures on the site under the Exempt and Complying Development provisions. Urbis notes consent is required for structures greater than 300sqm.

Agency Stakeholder	Consultation
	<ul style="list-style-type: none"> - Reiterated its key concerns were site access, noise, and operational management. - DPHI advised the Operational Plan of Management should be revised/updated to set the framework for non-race day events. This is provided at Appendix G. - Queried the progress of the acoustic assessment and suggested the use of front of house (FOH) monitoring. It is noted this comment was made in particular consideration of larger events of up to 50,000 patrons. As the scope has been reduced, an alternative approach to noise modelling has been adopted as discussed in the Noise Impact Report prepared by GHD at Appendix L and discussed in Section 6.3. - The Visual Impact Assessment should focus on the visual impact of the temporary structures and infrastructure of the medium and large events (25,000 to 50,000 patrons). DPHI is not concerned with the visual impact of structures for small-scale events (7,500 patrons) and these do not need to be modelled. This is adopted in the VIA prepared by Urbis and provided at Appendix J. - The assessment should consider cumulative impacts on a per-day basis of non-race day events, as well as existing race-day events, Night Racing, and previous consents within the Spectator Precinct. This is provided at Section 6.1.4. - Recommendation to refer the SSDA to NSW Police for comment and suggested the use of paid police to manage events. The ATC has engaged with NSW Police as outlined in this table. <ul style="list-style-type: none"> ▪ On 15 September 2022, a SEARs expiry notification for SSD-11973381 was issued by DPHI. ▪ On 1 July 2023, the SEARs for SSD-11973381 expired. ▪ Urbis engaged with DPHI on 6 September 2023 to request new SEARs following the expiry of SEARs SSD-11973381 and provide an update on the proposal. The key change included a reduction in project scope from events up to 50,000 patrons to events up to 15,000 patrons. The Scoping Report was accompanied by a BDAR waiver and an ACHAR waiver. DPHI had no further questions on the project scope and issued the revised SEARs on 14 November 2023. ▪ On 14 November 2023, Urbis withdrew the previous application SSD-11973381. ▪ On 17 November 2023, DPHI provided the BDAR waiver. ▪ Between January – July 2024, Urbis provided email updates to the Department on the status of the project and timeframe to lodgement.

Agency Stakeholder	Consultation
Environment and Heritage Group	<ul style="list-style-type: none"> ▪ Urbis submitted a BDAR waiver with the Scoping Report on 6 September 2023. ▪ On 14 November 2023, EHG granted the BDAR Waiver. This is provided at Appendix M.
Randwick City Council	<ul style="list-style-type: none"> ▪ A meeting with the Randwick City Council strategic planning team was held on 8 July 2024 and was attended by Urbis Planning, Mostyn Copper Group and the ATC. Urbis Planning provided a briefing of the proposal and discussed key aspects of the scheme including the operational management plan, temporary structures and site access. ▪ A number of questions were raised by the Council including: <ul style="list-style-type: none"> – Method of lighting and light spill to surrounding residents. It was noted a detailed assessment is provided in the Lighting Impact Assessment and measures proposed in the OMP to manage this. – Archaeology and whether engagement with the relevant Land Council had occurred. It was noted there are no archaeological impacts as a result of the proposal and as such the full ACHAR is not required. – Vehicular movements and size of vehicles moving throughout the site. It was noted the PTC Traffic Report provides a detailed overview of vehicles to access the site during and prior to events. – Community engagement with business groups, community members and the precinct groups, and whether the engagement would continue throughout the duration of events. It was noted this is addressed in the OMP, and confirmed to Council following that the Randwick Precinct Group was engaged as part of the process. Council requested the applicant also engage with the Kensington West Kingsford Precinct. This was undertaken on 10 July 2024. – Layout of events. Randwick Council noted the positives of the indicative orientation of stages internal to the site to reduce noise amelioration to residents along Doncaster Avenue. – Management of conflicts between race day and non-race day events. It was noted a race day and non-race day event would not be held concurrently, with race days to be prioritised as the core use of the site. <p>This EIS has been prepared to include a response to the items raised by Council planning team.</p> <ul style="list-style-type: none"> ▪ On 12 and 13 June 2024, ATC emailed the community newsletter to Council's General Manager, Mayor and Councillors. To date, two Councillors have responded showing support for the SSDA, particularly the contribution to the local economy and community. ▪ On 1 July 2024 and as part of the Social Impact Assessment, Urbis' Social Planning team met with Council's Community Development and Economic Development and Placemaking teams. There were no major issues with the proposal from Council's perspective and the key area of interest was opportunities to host community-based events at the Racecourse. The Social Impact Assessment at Appendix X has considered this advice.

Agency Stakeholder	Consultation
TfNSW	<ul style="list-style-type: none"> ▪ On 9 December 2022, Mostyn Copper, traffic consultants ptc. and Urbis Planning met with TfNSW's Development Assessment Unit to discuss the former SSDA's traffic implications. TfNSW provided the following feedback throughout the meeting: <ul style="list-style-type: none"> - ATC should assess whether the proposal will have a 'surge mode' and if so, incorporate strategies to slow this 'surge' of people leaving the site. - The broader road impacts of the Future Music Festival on surrounding areas, including Foveaux Street, should be considered. - Note: since the previous SSDA, the proposal no longer includes a music event of similar scale to Future Music Festival. - Protecting the Sydney Light Rail network (extending for 2km from the site) to ensure it remains open. <p>A response to these items is provided in the Transport Impact Assessment prepared by PTC at Appendix N.</p>
NSW SES	<p>GRC Hydro engaged with NSW SES on 27th May 2024. The following recommendations were provided and have been considered in the Flood Impact Assessment at Appendix S. Reiterate that severe weather and flood warnings are to be checked prior to the start of each workday and staff and visitors advised not to attend the site in the event of current warnings.</p> <ul style="list-style-type: none"> ▪ Reiterate that flooding emergency plans should be regularly exercised, similar to building fire evacuation drills. The NSW SES also recommends updating the FERP at regular intervals and whenever additional flood information is available or highlighted during the drills or flood events. ▪ Recommend that any proposed refuge location is above the height of the PMF and aligns with the Red Cross Preferred Sheltering Practices for Emergency Sheltering in Australia, including water supply, waste management, sanitation, food, and shelter and space management. ▪ Recommend, where possible, consulting with Transport for NSW on the impacts of flooding on people evacuating the site during or after a flood event.
NSW Police	<p>A project update to the Eastern Beaches Police Area Command was provided on 20 May 2024. The Security Crows Management Plan and CPTED Report were also provided for information and comment. A response was received confirming the documents had been received. No further issues were raised.</p>
Heritage NSW	<p>The Aboriginal Due Diligence (ADD) Report and a request for a waiver was submitted to DPHI and subsequently Heritage NSW on 19 September 2023. Heritage NSW confirmed email on 25 September 2023 that a full ACHAR is not required for the works and that the standard SEARs requirement does not apply to the application. Evidence of this consultation is appended to the ADD provided at Appendix Q.</p>

5.4. Engagement to be Carried out

The applicant will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- Continuing to engage with the community about the project, its impacts, and the approval process
- Maintaining the project website throughout the planning process
- Enabling the community to seek clarification about the project through the two-way communication channels.

6. Assessment of Impacts

6.1. Operation

6.1.1. Key Stakeholder Group

Non-race day events under this application will be managed by a key stakeholder group (**KSG**) formed to oversee the environmental performance of events. The KSG will include representatives from ATC, TfNSW, Randwick Council, NSW Police, Greater Sydney Parklands Trust, and the Moore Park Event Operations Group to ensure all potential impacts of events are considered prior to the event occurring and can be effectively managed during and after the event occurrence. Evidence of the KSG's establishment and key members will be provided to the Planning Secretary as a condition of consent.

The ATC will gain endorsement of the proposed event date from the KSG at least 90 days (3 months) prior to the event being held and will provide evidence of the endorsement to the Planning Secretary. In the event of a dispute between the applicant and the KSG, either party may refer the matter to the Planning Secretary for resolution on the proposed event date. To allow for short-lead events, events may be permitted to be endorsed within 90 days (3 months) prior to the event date subject to approval from the Planning Secretary.

All non-race day events on the site will operate in accordance with the OMP prepared by the ATC and provided at **Appendix G**. The intent of the OMP is to inform and guide ATC managers and staff, along with third party event operators, of the appropriate procedures to be undertaken throughout the preparation and running of non-race day events. The plans and guidelines outlined in the OMP are aimed at minimising impacts on any sensitive receivers that neighbour the Racecourse.

Due to the variation of potential events that may be held under this application, it is proposed that an event-specific OMP is prepared by the event operator and tailored to the requirements and needs of the non-race day event. The event-specific OMP will be supplemented by:

- Site Layout Plan and Event Schedule
- Noise Management Plan
- Traffic Management Plan
- Medical Plan

The ATC will submit event specific management plans to the KSG at least 90 days (3 months) prior to the event occurring. The endorsed Plans will subsequently be submitted to the Planning Secretary for information and be made available on request for other Government Agencies, Council or members of the community. This will provide certainty to stakeholders and the community of the nature and management of each event and is alike to the management of previous large events on the site including the Music Festival consent SSD-6134.

The ATC will facilitate a de-brief session with the KSG 30 days (1 month) following the event. Minutes of the session is to be provided to the Planning Secretary and considered by the ATC prior to scheduling of the following non-race day event.

6.1.2. Event Management

Operational Management Plan

The OMP prepared by ATC and provided at **Appendix G** provides a framework for management and monitoring of non-race day events, with event-specific detail provided prior to the event occurring. The OMP includes:

- The typical staging that would be used for planning and delivery of non-race day events on the site (refer **Figure 13**) and a timeline for events.
- A notification of the event will be provided to the community prior to the event occurring. These will be distributed via letterbox drop to neighbouring properties (illustrated in the map in the OMP) and on the ATC website. The notification will include the name, nature (description) and size of (expected crowd attending) the event, the date and time (duration) of the event (including sound tests and/or rehearsals) and contact details for complaints.

- The Racecourse currently have in place complaints register to record type and level of complaint. This complaints management procedure will be used for non-race day events under this application. Complaints can be submitted via the proponent's website, the proponent's address (77-97 Alison Road, Randwick, NSW 2031), a phone number (1300 729 668) which is displayed on the site or via email (info@australianurfclub.com.au).
- Identification of roles, responsibilities and contact details of key ATC personnel involved in management of the event.
- The ATC will monitor and review the operational effectiveness of the framework OMP and may revise it as required to ensure the ongoing effectiveness and suitability in managing the site during non-race day events. Any revisions will inform event-specific OMP.
- Management measures to mitigate the impact of lighting, noise, waste, traffic, pedestrian access and security / staff. These measures are consistent with the mitigation measures outlined in the technical reports appended to this EIS and provided in the following subsections.
- The ATC has an On-Premises Liquor Licence that covers the entire site including any temporary infrastructure. Any service of alcohol will be in accordance with the Liquor Licence and the Responsible Service of Alcohol & Harm Minimisation Strategy. An Alcohol Management Plan appended to the OPM provides further detail on management measures.

Figure 13 Process of hosting non-race day events



Source: ATC

Safety and Security

Precinct Management Group has prepared a Security Crowd Management Plan (**Appendix H**) to outline measures to support safety and security during non-race day events. Security on the site will be managed in accordance with the following strategies as per the Security Crowd Management Plan:

- Physical security recommendations (access control infrastructure, crowd management infrastructure communications systems, surveillance systems)
- Administrative security controls (accreditation systems, preventative security procedures, incident response procedures),
- Human resource (manpower) security controls / deployment (control and command, surveillance, static, response)
- Use of video surveillance cameras across the site, provision of stage crowd control barriers (where stages are required to support the non-race day event) and accreditation boards at security checkpoints to manage access control.
- Management of crowd control density. The Plan outlines an estimate of crowd control density for the Technical Layout Plan (**Appendix F**) based upon the Frui (1981) crowd control density and the BCA and identifies a maximum of 15,000 patrons in the area immediately fronting the stages. A crowd density assessment will be completed prior to any event once a promoter/event organiser is engaged to effectively manage crowd control.
- Security locations across the site, security / police deployment schedule and communication protocols.
- A security risk identification and analysis conducted in accordance with Australian Standard AS/NZS ISO 31000:2009 Risk Management. This includes identification of a potential security hazard, the risk analysis / harm and security controls to mitigate the risk.

Emergency Management

The Emergency Evacuation Plan prepared by PMG Group (**Appendix I**) has been prepared in accordance with the Australian Standards AS 3745:2010 Planning for emergencies in facilities, the NSW Work Health and Safety Act (NSW) 2011 / Regulations (NSW) 2017 and the SEARs. The Plan provides a framework for preparation of subsequent event-specific plans prior to the event occurring.

The Plan outlines emergency contacts, roles and responsibilities of the Emergency Control Organisation (**ECO**) that will monitor and manage emergencies, and evacuation measures. Certain management measures related to site safety and security are redacted for the purposes of public exhibition however will be provided in the final plan.

Emergency assembly areas on the site located on Ascot Street, Alison Road and High Street and will be used for non-race day events.

6.1.3. Cumulative Impact with Other Events

Regional Events

The site forms the southern end of a larger entertainment and recreation precinct located along the Moore Park Precinct, including Centennial and Moore Parks, Allianz Stadium (Sydney Football Stadium), the Entertainment Quarter and the Sydney Cricket Ground as illustrated in **Figure 2**. An overview of the related development consents for event approvals is provided in **Table 3**.

Conflict of large events within the Moore Park corridor will be managed through the following measures:

- Regular consultation with the Moore Park Event Operations Group (**MEOG**) prior to scheduling events will occur under this application. The MEOG is an established group that meets periodically and consists of key stakeholders from the proponent, TfNSW, Council, City of Sydney Council, Entertainment Quarter, Venue NSW (management of Allianz Stadium and Sydney Cricket Ground), Centennial Parklands, NSW Police and NSW Health. The group discusses various considerations relating to local development and large events, including the coordination of traffic and transport associated with major events.

The ATC will consult with the MEOG prior to hosting a non-race day event on the site. Documentary evidence of the consultation will be provided to the Planning Secretary prior to the event occurring.

This is a key measure to prevent cumulative impacts to the Moore Park Precinct and will ensure non-race day events are coordinated with other events in the Moore Park precinct and avoid scheduling of events simultaneously (where possible). This is similar to the management of previous large events on the site including the Music Festival consent SSD-6134.

- Details of the proposed event notification and the relevant information will be provided to surrounding residents and businesses, as well as details of an appropriate system for managing complaints during the event must be provided by each individual event. This will ensure residents and businesses are aware of events being held within the Moore Park precinct.
- Preparation of an Event Traffic and Transport Management Plan (**ETTMP**) for the proposed development to ensure that traffic and transport during non-race day events at the Royal Randwick Racecourse is safely and efficiently operated. This will include strategies to mitigate risks at points of crowd swell at key locations external to the Racecourse including pedestrian crossing / refuge points, the Racecourse primary entry at Gate 1, entries to Centennial and Moore Parks.

Further discussion of the management of traffic events along key transport routes including Anzac Parade, Alison Road and the Light Rail is provided in the Transport Impact Assessment prepared by PTC at **Appendix N** and **Section 6.4**.

The site currently accommodates race day events of up to 50,000 patrons and the ATC manages conflicts of race day events and other events in the Moore Park corridor. The accommodation of events with 5,000 – 15,000 patrons (at any point in time per day) on the site is not anticipated to cause considerable change to this area. The site has accommodated recreational/entertainment events on a historical basis and as such the proposal to use the site for non-race day events will not amend the function of this precinct.

Non-race day events will be for a temporary basis of between 1-3 days and as such any conflict will be on an infrequent basis for a short duration. The proposal is considered acceptable noting the role and function of this larger entertainment and recreation precinct.

Site Events

The site accommodates a range of events as outlined in **Table 2** including:

- In land and buildings of the Spectator, Midfield and Infield precincts of up to 5,000 patrons under the Spectator Precinct MOD 2 approval.
- In the Winx Stand under SSD 10285. The Winx Stand has a maximum patron capacity of approximately 7,000. There is no cap on the number of events held in the Winx Stand per annum under this consent.
- Historical day racing events. There are currently 45 racing events per year, which are scheduled as per the Australian Racing Calendar which is released on an annual basis. This includes 16 Night Racing events approved under SSD 8706.

As the proposal is anticipated to deliver up to 10 non-race day events in addition to 45 race-day events and other events already taking place at the venue, the frequency and number of events held at the Randwick Royal Racecourse is anticipated to increase. Potential cumulative impacts related to this proposal may occur as a result of reduced 'relief days' for residents within the regional precinct due to increase in the number of events within the precinct and fewer days in between events taking place.

Residents in the immediate social locality may experience noise, anti-social behaviour and traffic impacts with greater frequency and occurrence due to the proposed delivery of the events.

However, this is considered acceptable due to:

- The nature of the site as an established and historical recreation and entertainment facility.
- Any impacts will be temporary and short-term. All events will be conducted in accordance with management plans prepared and enforced by the ATC. In addition to the OMP prepared by MI Consultants at **Appendix G** and the event-specific Management Plan to be prepared by the event operator, this will provide a robust suite of management measures to operate events on the site and manage cumulative impact of events.
- Racing events will remain the key priority of the ATC and will be prioritised when scheduling non-race day events.
- The need to diversify the use of the site and provide alternative revenue streams in a post-COVID era. This application allow the multi-use of the open space of the Racecourse that would otherwise be off limits to the public other than on a race day or other special events.
- Improve the reputation and vibrancy of Sydney and NSW as a premier visitor economy.

6.2. Site Layout and Temporary Structures

6.2.1. Event Layout

Event layout will be determined by the type and nature of the non-race day event. Specific event layout for future events will be outlined within an event-specific layout plan prepared by operators and provided to the ATC prior to the event occurring. The indicative layout plan appended to this EIS demonstrates how the site can accommodate events without adverse impact on the amenity of surrounding properties or public spaces.

The design of this indicative event is informed by race day and previous non-race day events held on the site, including Future Music Festival held for a number of years under various consents (**Section 1.5**). It is noted these events were for a much larger scale up to 50,000, and is informed by feedback from the ATC, who have extensive experience in managing large events on the site.

The indicative event layout demonstrates the suitability of event layout on the site as:

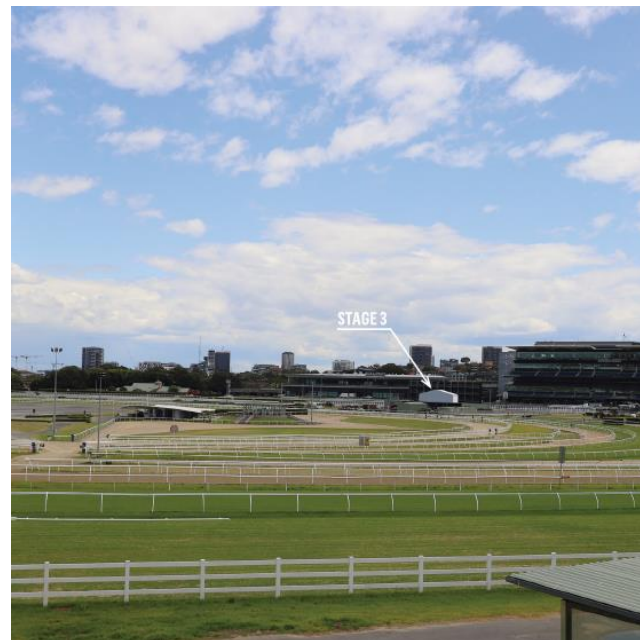
- The site is of a sufficient size and capacity to accommodate events of this size. The maximum patrons for race day activities are up to 50,000 patrons, with a typical race day event attracting between 35,000 – 40,000 patrons. The site can comfortably accommodate 15,000 patrons within the Spectator Precinct.
- Events will not be permitted within the Stables Precinct on the south-eastern corner of the site, to ensure there is no impact to horse stabling on this portion of the site.
- The accommodation of events in the Spectator Precinct will not have an adverse impact when viewed from surrounding vantage points due to the scale of the site. As illustrated in the below photomontage viewed from Wansey Road light rail station, the event location and provision of temporary structures is minimal when considering the size of the site (79.93 hectares) as well as the scale of existing buildings on the site including the QE II Stand and Winx Stand. Structures within the Spectator Precinct are similarly concealed by existing buildings on the site. This is discussed further in the VIA prepared by Urbis and in **Section 6.8**.

Figure 14 View of event location and temporary structures from surrounding area



Picture 6 View from Alison Road

Source: Urbis



Picture 7 View from Wansey Road

Source: Urbis

- The design seeks to maximise permeability and connectivity through the Spectator Precinct through placement of large structures adjacent to existing built structures to enable clear pathways through the site. Stages are positioned within the Theatre of the Horse, adjacent to the racetrack and next to the busway. Supporting services such as police, OHS, security and merchandise are located along the

northern boundary of the Spectator Precinct (close to the primary entry) whilst services and back of house are located to the south of the Winx Stand near vehicular entries.

- The primary pedestrian routes through the Spectator Precinct are retained to ensure equitable distribution of pedestrians through the site and avoid conflict between event patrons and services. Whilst Gate 1 will be the primary entry, a range of supporting gates including Gate 6/7 on Alison Road and Gate 18 on Ascot Street may also be used to ensure adequate pedestrian and vehicular access to the event.
- Events are located in the Spectator Precinct and indicative stages are oriented internally towards the site to minimise noise and light spill as discussed in **Section 6.5** and **Section 6.3**. The orientation of stages inwards towards the site will ensure sound and light is directed to patrons as required and minimise noise amelioration and light spill to the residential areas to the north-east and west along Doncaster Avenue. Existing buildings, the Light Rail stabling yard and Anzac Parade will provide a buffer to these areas.
- The proposed site layout is entirely consistent with the pattern of land uses outlined in the site specific provisions of Section 3.1 of Part E of the Randwick DCP, with entertainment uses provided in the Spectator Precinct and car parking in the Infield Precinct.

6.2.2. Temporary Structures

The proposal seeks consent for erection of temporary structures on the site. The largest temporary structures likely to be proposed are tents and marquees, with other structures including stages, screens, lighting poles, amenities, etc. The maximum height of temporary structures would likely consist of high specification marquees up to two storeys (approximately 8.805m). This is discussed further in the Visual Impact Assessment appended to this EIS and in **Section 6.8**. These two storey structures have consistently been used for non-race day events across the site in the past and are utilised during race-day events on the site. There will be no impact on solar access outside of the site boundary and any impact will be temporary.

Consent is sought for erection of temporary structures within the boundary of the Spectator Precinct (as illustrated in the Site Plan prepared by MI Consultants and appended to this EIS) to support an event on site. It is not proposed to specify the number or type of structure, as this would unnecessarily restrict the function of the site. The proposed approach to erect any temporary structure within the Spectator Precinct is sought to provide sufficient flexibility to future event operators based upon event-specific requirements.

The erection of temporary structures on the site is acceptable as:

- Structures will be erected within 10 days preceding the event and dismantled and removed from the site within 10 days following the event, and as such any impact will be temporary and short-term.
- Structures will be positioned on a level stable surface and sufficiently weighted to ensure stability at all times of use. Event operators erecting the structures will ensure the ground on which the structure is erected is sufficiently firm and level to sustain the structure while in use.
- Event operators will monitor structures throughout the duration of the event to ensure any potential safety concerns (such as during adverse weather conditions) are resolved.
- Structures will be erected in accordance with the relevant provision of the Building Code of Australia (BCA) and Australian Standards to ensure the structures can adequately support the proposed loads.
- Event operators will manage use of the structures to ensure the number and width of exits and maximum number of people permitted in the temporary structures is in accordance with the provisions of the BCA. The number and width of exits to any tent, marquee or booth used as a temporary structure will be provided in accordance with the provisions of NSW H102.4 and NSW Table H102.4. Event security will ensure overcrowding of temporary structures does not occur.
- Erection of structures will be carried out to ensure that there is no damage to the site, including existing structures and landscaping elements.

6.3. Noise Impacts

Overview

GHD have prepared a Noise Impact Assessment (NIA) (**Appendix L**) to assess acoustic impacts of the proposed non-race day events in accordance with Item 15 of the SEARs.

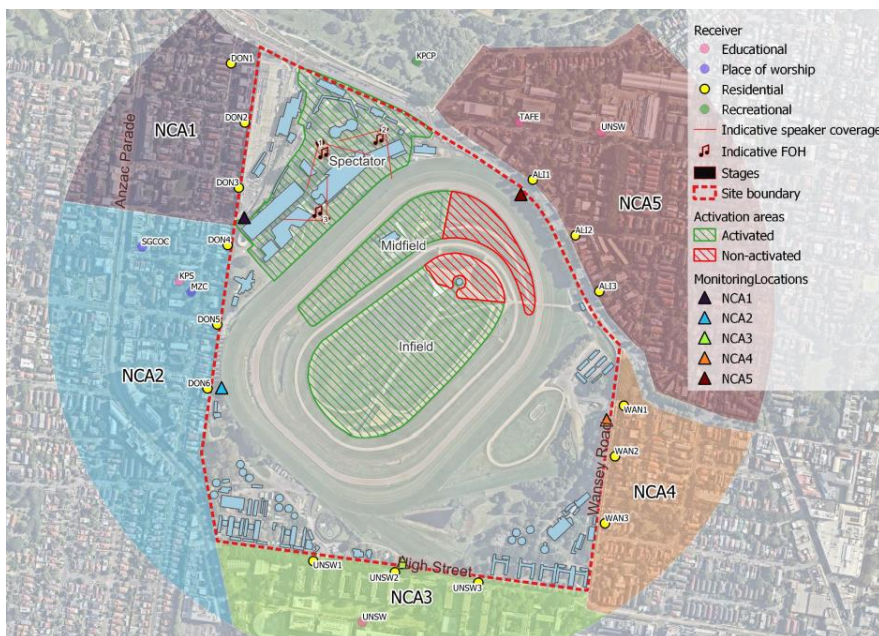
The NIA is appended by a draft Noise Management Plan (**NMP**) which outlines the appropriate event specific operational and design mitigation measures. The draft NMP will be finalised and approved by the relevant agency prior to commencement of events, with the final NMP to be retained on site and made available upon request.

Methodology

The following activities have informed the NIA:

- Identification of sensitive land uses in the surrounding area. The NIA identifies five noise catchment areas (**NCA**) which are the most-affected receivers. These are illustrated in **Figure 15** and include urban residential (NCA1), suburban residential (NCA2), residential (NCA 3 and 4), and urban residential (NCA 5). Other sensitive land uses include educational institutions and places of workshops, however, have a less-stringent noise criteria and as such is not included as compliance would be determined based on the sensitive NCAs.
- Unattended long-term noise monitoring was undertaken between Tuesday 6 September 2022 and 13 September 2022 at each NCA. Whilst the data is two years old, GHD consider the noise monitoring is still representative of the existing noise environment as the area has not significantly changed during this period. The five noise monitoring locations is identified in **Figure 15**.

Figure 15 Noise monitoring locations



Source: GHD

- Review of historical noise limits for the Racecourse. GHD note the most recent Music Festival consent for the site (SSD-6134 – discussed in **Section 1.6**) included the following noise limits for non-race day events with a capacity of 50,000 patrons:
 - Lmax 70 dBA between 12:00 pm and 10:00 pm
 - Lmax 90 dBC between 12:00 pm and 10:00 pm

GHD have reviewed the applicability of these measures to the proposal and consider the use of Lmax noise descriptor is not considered suitable to assess the exposure of noise over a given time period, as this does not account for fluctuations of sound exposure over the measurement period.

Comparably, the Leq noise descriptor considers the varying noise levels to provide a better representation of noise exposure over a given time period and has been used recently for concert noise management plans in NSW.

The NIA adopts this noise descriptor for the noise assessment. A shorter measurement period of 5 minutes is proposed to represent the average duration of a song. This enables more regular intervals of assessment and evaluation and also enables a faster response process to manage noise during events.

- Review of noise limits for various venues in NSW, including Allianz Stadium (SSD 9835 – refer **Section 1.6**), Western Sydney Stadium (SSD-8175) and Sydney Opera House (DA-445-10-2003-MOD4).

Consideration of the Sydney Opera House consent is consistent with the feedback received from the DPHI in the pre-lodgement period. Whilst the benefits of this approach is noted, GHD consider the front of housing monitoring is not appropriate to assess the proposed technical layout plan (an indicative outline of noise generating activities on the site) as this includes three stages operating simultaneously. There are a number of variables that can be modified with each sound system configuration for the stages, including number of speakers, angle of speakers, number of subwoofers, angle of dispersion and configuration of the array.

GHD cannot assume each event would adopt the same speaker configuration and technical layout – and this stage, the configuration of each is not known. GHD consider it is appropriate to determine an achievable noise limit at the receivers and ensure the speaker arrangement/parameters prior to each music event are designed accordingly to achieve the noise limits at the receiver. This will allow for the flexibility of event type and site layout sought under this application.

- Review of a case study “*Impact live event sound level regulations have on sound engineering practice*” (AJ Hill, University of Derby, UK, 2020) to inform noise limits. This includes data collected from 130 music events over a 5-year period where patron numbers ranged from 6,000 to 78,000 patrons.
- Configuration of indicative stage locations in ArrayCalc noise modelling and SoundPLAN 8.2 noise modelling software.
- Estimation of crowd noise levels at the worst-case music event. It is assumed that the event is attended by 15,000 patrons with 1/3 patrons talking over a 15 minute period. The octave-band sound power levels have been sourced from *Vocal effort levels in anechoic conditions*. This results in a range of crowd noise levels between 72dB(A) (normal) – 88dB(A) (loud).

The noise monitoring has informed the rating background level and ambient noise descriptors for each NCA.

Assessment

The NIA provides an assessment of both music and non-music events due to the varying acoustic impact of the range of non-race day events under the application. This approach is the most suitable due to the significant variation in noise generation between the range of event types.

GHD identify the primary noise sources associated with all events include:

- Patron noise within the site
- Noise generated from bump in / bump out activities (delivery trucks, cars, cranes etc.)
- Noise generated from temporary generators and mechanical plant
- Noise generated from patrons entering and exiting the site (potential sleep disturbance)
- Noise generated from car parking activities within the site
- Additional road traffic noise on public roads from vehicles entering/exiting the site

Additionally, noise from music events will include Front of House system for each stage (including subwoofers) and ancillary speaker systems (delay system and stage foldback system, if required).

Noise Limits

The Technical Layout Plan at **Appendix F** is used to inform speaker arrangement and configuration in the noise modelling for the worst-case music event. This is provided for reference only to demonstrate acoustic impact of the sound system.

Prior to each music event, an event-specific noise management plan will be prepared by the operator detailing the proposed speaker configuration and include detailed noise modelling to demonstrate that the

noise limits can be achieved. After a year of operation, a detailed review of the sound system configurations used for each music event and stage is proposed to be undertaken to determine whether a deemed-to-comply stage configuration is appropriate for each music event category. This would minimise the need for an event specific noise management plan for every subsequent music event.

Based upon the methodology undertaken, the proposed residential receiver noise limits are:

Table 14 Proposed noise limits at residential receiver locations

Activity	Receiver Noise limit										
Music Event	70 Leq(5min) dBA 90 Music events, Leq(5min) dBC										
Non-Music Event	55 Leq(15min) dBA										
Bump in / bump out / plant (based upon the evening criteria)	<table><tr><th>NCA1</th><th>NCA2</th><th>NCA3</th><th>NCA4</th><th>NCA5</th></tr><tr><td>48</td><td>47</td><td>44</td><td>50</td><td>55</td></tr></table>	NCA1	NCA2	NCA3	NCA4	NCA5	48	47	44	50	55
NCA1	NCA2	NCA3	NCA4	NCA5							
48	47	44	50	55							
Bump in / bump out / plant (based upon the evening criteria)	<table><tr><th>NCA1</th><th>NCA2</th><th>NCA3</th><th>NCA4</th><th>NCA5</th></tr><tr><td>44</td><td>43</td><td>40</td><td>42</td><td>45</td></tr></table>	NCA1	NCA2	NCA3	NCA4	NCA5	44	43	40	42	45
NCA1	NCA2	NCA3	NCA4	NCA5							
44	43	40	42	45							
Sleep disturbance (based upon patron egress from the site once an event has concluded)	<table><tr><th>NCA1</th><th>NCA2</th><th>NCA3</th><th>NCA4</th><th>NCA5</th></tr><tr><td>54</td><td>53</td><td>50</td><td>52</td><td>55</td></tr></table>	NCA1	NCA2	NCA3	NCA4	NCA5	54	53	50	52	55
NCA1	NCA2	NCA3	NCA4	NCA5							
54	53	50	52	55							
Road traffic	Existing freeway/arterial/sub-arterial roads (Alison Road and Anzac Parade): ▪ LAeq(15hour) 60 dBA day ▪ LAeq(9hour) 55 dBA night Existing local roads (Doncaster Avenue and High Street): ▪ LAeq(1hour) 55 dBA day ▪ LAeq(1hour) 50 dBA night.										

Noise Modelling Results

GHD have estimated the noise generated from music and non-music events, including patron noise and patrons leaving the site. GHD have also assessed traffic noise between 10pm – 12am, when patrons would be leaving the site and the impact is at its greatest. These estimates are based upon the Transport Impact Assessment (**Appendix N**) and assumes 40% egress from the multi-deck car park, 60% egress from the infield car park, (and in addition to private car use) the use of taxi and Uber.

The results are a worst-case assessment, and it is anticipated that actual noise levels would be lower than the predicted levels. The findings demonstrate:

- Music event criteria: The estimate noise from music events (using the Technical Layout Plan as the indicative basis) comply with the proposed dBA and dBC receiver noise limits at all locations.

The most affected property is at DON 3 with a cumulative noise level of 63dBA and 88dBC. The report recommends installation of a noise management system on the boundary nearest this receiver.

- Non-music event criteria: The estimate noise from non-music events comply with the Leq(5min) 55 dBA noise limit.
- Road noise criteria: Noise emission from vehicles leaving the members car park and the infield car are predicted to comply with the relevant road traffic noise criteria at sensitive receivers on Doncaster Avenue, however is predicted to exceed for sensitive receivers on High Street and Ascot Street. This is considered acceptable as noise would be on an infrequent basis for a short duration and for events with smaller patron numbers less than 15,000 patrons, the noise impact from road traffic will be reduced.

Traffic on all other roads is not expected to impact the residential receivers in the area due to high existing traffic volumes.

- Sleep disturbance criteria: Based on the running time of the events, it is likely that the exit of patrons will extend beyond 10:00 pm. As such, a noise emission assessment of patrons entering and exiting, via foot traffic and vehicle have been assessed against the night-time criteria to determine the extent of sleep disturbance. To assess sleep disturbance impacts on residential receivers after 10 pm, the following has been assessed:
 - Cars exiting at Gate 1, 18 or 13 – assumed L_Amax sound power level 90 dBA
 - Car door slam within the taxi rank area – assumed L_Amax sound power level 97 dBA
 - Patrons yelling near Gate 1 or within the taxi rank area – assumed L_Amax sound power level 97 dBA

At the nearest residential receiver to these locations the predicted L_AFmax noise level, dBA for cars and patrons comply with the EPA's Noise Policy for Industry (**NPI**), except for Gate 18 discussed below. As these are most impacted receivers, all other activities on the site after 10 pm are not expected to result in sleep disturbance impacts.

Noise levels from vehicles driving past the residents directly outside Gate 18 are predicted to be above the NPI sleep disturbance screening criteria. However, based on guidance from the Road Noise Policy, the external noise level of 63 dBA (with a conservative internal level of 53 dBA with 10 dB reduction through open window) are *"unlikely to cause awakening reactions"* and as such the noise level is considered acceptable. GHD recommends measures to further mitigate impact outlined below.

- Bump-in/out: Assuming Gate 1, Gate 18 and Gate 13 are used, the predicted noise levels are less than L_Aeq(15min) 40 dBA at the nearest receivers to each gate. This would result in noise levels below the relevant noise criteria.
- Plant: Compliance of plant with noise criteria is unable to be confirmed at this stage.

Mitigation Measures

GHD recommend that management measures are required to mitigate the impact of non-race day events on surrounding receivers. These measures include:

- Implementation of the Noise Management Plan appended to the NIA.
- Prior to any music event, an event specific noise management plan would be prepared by the operator detailing how the requirements of the noise management plan would be met. This would include noise modelling of their proposed sound system configuration showing how the adopted noise limits could be met at all receiver locations.
- Completion of a review of sound stage configuration for each music event and stage to determine whether a deemed-to comply stage configuration is appropriate for each music event category. This would minimise the need for a event specific noise management plan for every subsequent music event.
- Installation of a PNMS along the site boundary (representative of the most-affected receivers) to determine compliance during rehearsals and events.

- Patrons leaving the venue following the completion of the event should exit through the entry/exit gates on Alison Road.
- Patrons exiting via Ascot Street will be minimised and monitored by security personnel to manage amenity impacts of the residential receivers in this area.
- Patrons exiting on Alison Road should be directed by security towards public transport and areas away from residential receivers. Staff should be directed to monitor noise levels and ensure that patrons are departing in a quiet manner as to not impact the residents in the vicinity of the racecourse.
- Signage will be erected to inform the patrons to leave in a quiet and orderly manner and to consider the residential neighbours. The signage should also direct patrons to the correct exits.
- Clear signage will be displayed throughout the car park informing patrons to return to their vehicles and exit the car park in a quiet manner.
- Security will be located at Gate 18 and the exit to High Street to monitor the movement of traffic exiting the car park.
- Speed signs should be located throughout with a maximum speed of 10 km/h.
- As part of the community notification and consultation, inform resident of potential impacts from vehicles entering and exiting the site.
- Once operational, noise monitoring should be undertaken to determine the impacts from vehicles exiting the site and determine whether additional mitigation measures should be proposed, such as at property treatments.
- Temporary generators should not be positioned within the red shaded area after 10pm, and only located in the yellow area should generators be required to operate after 10pm.

Figure 16 Recommended location of temporary generators after 10pm



Source: GHD

6.4. Traffic and Parking

A Transport Impact Assessment (**TIA**) has been prepared by PTC Consultants at Appendix N. In accordance with SEARs Item 8, the TIA provides an analysis of the impacts of the proposed development. The TIA is appended by a Transport Management Plan (**TMP**).

PTC Consultants note that the SEARs require the provision of a Construction Traffic Management Plan (**CTMP**). The events will involve the installation and erection of temporary structures (marquees, stages etc.) within the site and well away from the road network / public domain.

The bump-in and out of the event infrastructure will occur within the site and involve the movement of trucks to and from the entry gates, but no construction vehicles. This activity does not constitute construction activity in the traditional manner, as no physical works are occurring on or near a road and no construction vehicles are involved. PTC consider preparation of a full CTMP is not required for the proposal and instead management of bump in and bump out will be as per the TMP appended to the TIA, and the OMP provided at **Appendix G**.

Methodology

The following activities have informed the TIA:

- An analysis of the existing transport network surrounding the site which provides a baseline context for the subsequent impact assessment.

The site is well serviced by frequent and highly accessible public transport due to the proximity to the Royal Randwick Light Rail stop, and surrounding local bus stops which accommodate 21 unique bus services. The majority of these services afford access to the Sydney CBD and therefore provide a high-level access across Sydney and NSW regional areas.

Pedestrian and cyclist connectivity is supported by footpaths, signalised intersections, and the shared pedestrian / cyclist path along Anzac Parade and Alison Road. This share route provides connectivity to the broader Randwick Council cycling and pedestrian network, and those of adjoining Councils, providing direct linkages between the Racecourse and the Greater Sydney area.

- Intersection modelling using SIDRA software has enabled an analysis of the capacity of the surrounding road network and to determine the impact of additional traffic trips to the site on the road network.
- Analysis of patron postcode data collected at major racing events at the site to determine travel catchments. From this data, it was determined that key origins include the local Randwick and Eastern Suburbs area (14%), North Shore (12%), City and Inner West (11%), Sutherland (7%) and Liverpool (7%). The remaining patrons are from regional areas.
- Analysis of travel mode share data collected at major racing events in 2017 to estimate arrival and departure modes.
- Traffic counts and car occupancy surveys conducted at the Everest racing event 14 November 2017.
- Estimate of the following predicted mode share split for the event based upon significant collection of relevant data, including patron travel surveys, patron post-code data and traffic surveys:
 - Private trips: 25%
 - Taxi and Uber: 16%
 - Light Rail: 23.5%
 - Bus: 20%
 - Shuttle bus: 5.5%
 - Hire car: 5%
 - Walking: 5%

Assessment

Road capacity and intersection performance

The TIA classifies the events based upon patronage capacity to better assess the traffic, transport and parking impacts. The classification is based upon the TfNSW Guide to Traffic and Transport Management for Special Events as follows:

- Class 2 event: 10,000 – 15,000 patrons
- Class 3 event: 5,000 – 10,000 patrons

The proposal is not classified as a Class 1 event, which is an event that impacts major traffic and transport systems, disrupts the broader community and requires involvement of police, Council and TfNSW (e.g. Sydney Marathon).

The existing scenario assessed is for the worst-case traffic movements on a Saturday between 11am – 12pm. Intersection performance has been modelled with SIDRA Intersection 9.1 software for the existing Scenario, Class 2 and Class 3 event. The findings include:

- Road closures and traffic diversions are not required for the proposal.
- The Class 2 event (10,000 – 15,000) is likely to generate 1,700 vehicles arriving and 698 vehicles departing.
- The Class 3 event (5,000 - 10,000) is likely to generate 1,133 vehicles arriving and 466 vehicles departing.
- Most surveyed intersections are operating at good level of service during the existing Saturday peak hour. The road network has spare capacity. The exception is the intersection at Anzac Parade / Alison Road / Dacey Avenue, which is operating at Level of Service (**LoS**) E and is at capacity in the existing scenario.
- During the critical Saturday peak hour for Class 2 events (10,000 – 15,000), some delays are expected in the road network. The additional traffic activity generated by the proposed non-race day events will result in some extension to delays on the network and some intersections to reach capacity, including:
 - Anzac Parade / Alison Road / Dacey Avenue – LoS E (at capacity)
 - Alison Road / Doncaster Avenue – LoS F (extra capacity required)
 - Alison Road / Racecourse Entrance – LoS F (extra capacity required)
- During the critical Saturday peak hour for Class 3 events (5,000 – 10,000), the impact is less with the following intersections at capacity:
 - Anzac Parade / Alison Road / Dacey Avenue – LoS E (at capacity)
 - Alison Road / Racecourse Entrance – LoS F (extra capacity required)
- No notable change in servicing demands is anticipated during the events and during the bump-in/ bump-out. As such, servicing facilities on-site are proposed to remain as per the existing arrangements which includes light commercial vans, utes, rigid trucks and articulated trucks.

Cumulative Impact

Where events in the surrounding area occur simultaneous to non-race day events on the site, this will result in a greater impact on the road network and a decrease in network performance capacity. It is therefore essential to ensure consultation with MEOG as per the mitigation measures.

Impact on the surrounding local road network is a recognised issue and the ATC actively implement transport management plans for large events on the site. This will be applied for non-race day events as outlined in the mitigation measures.

Public Transport Network

Without additional public transport services for events, PTC identify that regular public transport services would be impacted by events due to insufficient capacity. Ongoing consultation with TfNSW is recommended to enable:

- Increased Light Rail services to accommodate capacity for up to 10,000 patrons per hour per direction, in addition to regular light rail users.
- Increased bus services to accommodate capacity for up to 1,000 additional patrons between the Racecourse, Bondi and Central.

Based on an anticipated maximum crowd of 15,000 patrons and the adopted public transport mode split of 43.5% (23.5% by light rail and 20% by public buses), this results in 6,525 patrons travelling to and from the

site via public transport. Based on the estimated travel direction split, it is estimated that 75-85% of patrons using public transport will head towards Central.

There is sufficient capacity for the 6,525 patrons using public transport when considering the increased Light Rail and bus services for up to 11,000 patrons. Engagement with TfNSW, Light Rail operator and the bus operator will be essential for events on this site.

Pedestrian and Cycling Network

Pedestrians and cyclists are likely to originate from the immediate locality. The locality provides well-lit footpaths around the site, along with signalised crossings along major junctions at State roads.

As no road closures are proposed for the non-race day events, all footpaths and cycle paths will remain accessible throughout the event. ATC staff will manage crowd control at the completion of event to ensure local access on adjacent paths are not notably impacted as per the measures outlined in the OMP (**Appendix G**). As such, no significant impacts to pedestrians in the locality are anticipated to result from non-race day events.

Parking and Drop-off Provisions

The site currently accommodates 4,047 parking spaces in the multi-deck and infield car parks. These are proposed to be utilised at full capacity under the proposal. In addition, an additional 700 spaces are available for use in the Moore Park car park providing a total of 4,747 spaces.

The mode share surveys indicate a parking demand of 1,876 spaces which can be accommodated on site. As the infield car park provides informal parking, PTC recommend ATC parking management staff monitor arrangement of vehicles to maximise parking supply.

The site currently accommodates a range of drop off facilities as discussed in Section 2, including:

- Taxi Rank via Ascot Street, Gate 18
- Public Bus layby via Alison Road
- Shuttle drop-off via Alison Road, Gate 1 and infield car park
- Limousine, and large shuttle/coach drop off, via the Bus layby

The assessment demonstrates these facilities provide sufficient capacity to accommodate drop off and pick up movements. The proposed mitigation measures to incentivise use of public transport will reduce demand for these facilities.

Mitigation Measures

Overall, it is considered that patrons and vehicles departing the site would not result in adverse impacts as traffic exiting the site will be on an infrequent basis for a short duration following each event and mitigation measures are proposed to reduce the impact of patron and vehicle noise. These measures include:

- Preparation of an event-specific TMP. The TMP appended to the TIA provides a basic framework which may be adopted for event specific TMP's.
- Regular consultation with MEOG to coordinate events in the Moore Park precinct.
- Arrange additional Light Rail and bus services on event days through consultation with MEOG, and Additional light rail staff management around light rail stations anticipated to receive significant increases in patrons. In addition, close monitoring of key Light Rail stations during events, to understand their performance, and identify and take action on any issues
- Notify Sydney Trains of upcoming events and arrange for necessary interfacing signage and management between light rail, bus and train interfacing.
- Notification to residents prior to events occurring.
- Promotion of non-race day events as public transport events and facilitate this with Travel Access Guide.
- Promotion of measures to reduce private car use including:

- Discounted parking should patrons arrive an hour before event start times to stagger arrival;
 - Car-pooling, with Premium parking for vehicles with >3 passengers;
 - Integrate free public transport services with pre-purchased tickets;
 - Support increased shuttle services between hotels;
 - Continued patron surveys, to track travel trends and identify barriers and opportunities in public and active travel access;
 - Regularly update the website and wayfinding to incorporate changes in local travel infrastructure and timetables, and seek opportunities to promote them.
- ATC staff / traffic controllers to be positioned at the pedestrian crossing between Gate 1 and Alison Road. For Class 2 events, Police presence may also be required.
 - If required, temporary control devices around stations may be installed, including queue cordons, advisory signage, etc.

6.5. Lighting Impact Assessment

Overview

Royal Randwick is an established event venue with existing lighting for pedestrian safety and circulation throughout the site, and in particular within the Spectator Precinct and the Infield Precinct surrounding existing at-grade parking areas. This existing lighting will be used to support non-race day events on the site and as such there is no need for construction of new permanent lighting across the site to support non-race day events during night-time.

As outlined in **Section 3.2.3**, a range of ancillary temporary structures may be erected for events. This includes three stages with associated stage lighting structures. As such, a Lighting Impact Assessment (**LIA**) has been prepared by IGS at **Appendix K** to assess the impact of the temporary stage lighting on surrounding uses in accordance with requirement 4 of the SEARs.

It is noted that additional temporary lighting may be required trackside (adjacent to the Winx Stand) and at pedestrian Gates along the boundary to assist safe egress and limit anti-social behaviour. This lighting is not included in the LIA as the need for the additional lighting is entirely dependent upon the type of event, the event layout, and the access points utilised. If required, this form of temporary lighting is not considered to have an adverse impact as the lighting will be:

- aimed downwards and facing away from residential areas,
- controlled to limit light spill or upward light,
- concealed by the Officials Stand, WINX stand and Multi-Deck Carpark which provide a physical barrier to ensure lighting spill will not adversely affect residents to the west and north-east, and
- positioned so that the adjoining Light Rail and road users do not suffer glare.

Methodology

To provide an estimate of lux levels of the stage lighting for the three stages in the Spectator Precinct (illustrated in the Technical Layout Plan appended to this EIS and extracted at **Figure 10**), IGS assumes the following lighting fixtures and luminance level will be adopted for each stage:

- | | |
|--|--|
| ▪ Front of stage lighting (fixed) – 486W LED | ▪ Wash light (movable) – 225W LED |
| ▪ Gobo lighting (movable) – 1700W HID | ▪ Gobo profile lighting (movable) – 475W LED |
| ▪ Profile spot lighting (movable) – 800W LED | ▪ PAR wash light (fixed) – 180W LED |
| ▪ Gobo beam lighting (movable) – 190W HID | ▪ Wash light (movable) – 1200W LED |

Using the data of the lighting fixtures at each stage, IGS estimated the lux levels using the inverse square law $E = I/d^2$. The assessment is a worst-case scenario including all stage lighting operating concurrently, and:

- No diming of the lights.
- Moving lights are oriented towards the site boundary.
- The lighting colour is RGBW which has the highest luminous output.
- Physical features of the site (such as existing buildings, large trees, fencing and covered walkways) are not included.

Assessment

To assess the impacts of temporary stage lighting, IGS have assessed the luminance levels of stage lighting against the AS/NZS 4282:2023 Control of obtrusive effects of outdoor lighting and AS/NZS 3827.1:1998 Lighting system performance – accuracy and tolerances.

Section 1.2 of AS/NZS 4282:2023 states:

1.2 This document does not apply to the following:

a) Lighting for entertainment & festivals that is designed for a performance or an event that operates outside curfew hours (11 pm to 6 am), and for regularly occurring events of not more than 30 mins each night, excluding sports lighting.

This document does not apply to the following unless specified by the relevant authority:

*(ii) **Temporary lighting** other than stated in item (a), operating for less than a month.*

(emphasis added)

The AS/NZS 4282:2023 states the following for entertainment events:

*With any outdoor lighting system it is not always possible to contain all light within the boundaries of the property on which it is installed. **Some light may spill outside the property boundaries**, either directly or by reflection. The determination of when spill light becomes obtrusive to others is difficult since both physiological and psychological effects are involved. Irrespective, spill light should be limited where possible within limits of the lighting function.*

As such, the provisions of AS/NZS 4282:2023 **do not technically apply** to the proposed installation of temporary stage lighting structures. Any indicative stage lighting would be oriented inwards towards the site and the event patrons, to minimise spill lighting as much as possible within the limits of the lighting function. Notwithstanding this, an indicative assessment against the provisions has been undertaken to address the SEARs.

The site is located within the zone A4 high district brightness, where residential areas abut commercial areas. For this site, the maximum obtrusive lighting provisions for Royal Randwick during curfew (11pm – 6am) and pre-curfew hours (6am – 11pm) is as follows:

Figure 17 Lighting levels outlined in Australian Standards

Zone	Ev max Lux pre-curfew	Ev Lux curfew	Tl %	Skyglow ULR	Luminous intensity (I) cd pre-curfew	Luminous intensity (I) cd curfew
A4	25	5	20	0.03	25 000	2 500

Source: IGS

An assessment of the estimated luminance levels measured from the site boundary of the temporary stage lighting has been undertaken against the maximum luminous intensity candela (**cd**) of 25,000 and maximum lux of 25. All events will conclude by 10:30pm under the proposed hours of operation, and as such only the 'pre-curfew' maximum levels are assessed.

The LIA identifies the maximum cd at the boundary is less than the maximum, however the luminance levels will exceed the lux of 25. The use of temporary stage lighting is considered acceptable as:

- The Australian Standards do not apply to the development.
- The effects of the non-race day lighting will not be as noticeable until between the hours of 7.20pm / 8.30pm (depending on beginning, end or mid-summer) up to 10.30 pm, which represents only a portion of the event duration.
- There will be limited impact on residential amenity of properties to the west and north-east as lighting will be obscured by existing buildings including the Winx Stand, QE II Stand, the Multi-Deck car park and the Light Rail stabling yards, as well as existing evergreen trees and site fencing.
- All stages are oriented inwards towards the site and as such no impact is anticipated for residential properties to the east and south-east across the Racecourse, which is 713m in diameter from Spectator Precinct to High Street and 763m in diameter from Spectator Precinct to Wansey Road.
- Lighting levels calculated at the vertical face of surrounding properties do not take into account any window coverings such as blinds or curtains, which would reduce the level of light impact on surrounding properties.
- There will be no impact on road safety and the Light Rail as lighting will be oriented towards the designated stage area and not the surrounding road and rail infrastructure corridors.
- IGS considers that due to the high ambient lighting surrounding Royal Randwick and the proposed hours of operation, there will be minimal impact on local flora and fauna and on the Centennial Parklands. Further, the BDAR Waiver Request prepared by Cumberland Ecology confirmed the development, including installation of temporary structures, is not likely to have an impact on biodiversity values.

Overall, any impact to amenity of residents or road users would be of a temporary, short-term nature as all lighting structures will be dismantled after each non-race day event and as such is acceptable. Use of the site for large events with supporting infrastructure is consistent with the ongoing use of the site as a recreational facility since 1883.

Mitigation Measures

The LIA provides a range of mitigation measures for consideration and implementation by event operators:

- Each stage will be operated by an independent sound/lighting desk.
- Lights shall be extinguished or dimmed down at the conclusion of the event time to allow for “bump out” activities.
- Lights in the Spectator and Infield Precinct shall turn ‘on’ via photo-electric (PE) cell at dusk and ‘off’ by time clock at a time to be confirmed by the event operator once patrons have left the site.
- Moving light fixtures should be programmed to prevent light travelling beyond the site boundary.
- Promoters should be encouraged to use LED fixtures wherever possible. When HID sources are used, (types 2 and 5), the wattages should be limited to ≤ 800 to prevent potential spill beyond the site boundaries.

6.6. Flooding and Evacuation Management

Overview

A Flood Impact Assessment (**FIA**) prepared by GRC Hydro is appended to this EIS at **Appendix S**. Results are discussed below. The report has been prepared to assess SEARS Item 12 and identifies flood risk onsite and required management measures to minimise the impacts of flooding on the proposed development and procedures in the event of an emergency.

Methodology

The FIA is based upon the Council TUFLOW 2D flood model, which represents 2013 catchment conditions with the Light Rail included. GRC Hydro have updated the flood model to include recent catchment

information and new developments in the past eleven years, update to 2024 topography and terrain updates, surrounding buildings based upon aerial imagery, current stormwater network and underground connections on the site.

Assessment

The site forms part of the Kensington and Centennial Park stormwater management network. Flood behaviour on the site is characterised by overland flow incoming from the east conveyed via Alison Road, with some floodwater spilling into the racetrack and the eastern corner of the Spectator precinct. There are three flood basins on the site located within the Infield and Midfield precinct providing floodwater storage in the 1% AEP flood extent as illustrated in **Figure 18**.

Outflow from the site occurs through sag inlets on the site which discharge to Council stormwater assets to the west on Anzac Parade. In rare flood events, there can be overland flow into Doncaster Avenue and Anzac Parade from the racetrack when the storage capacity of the site is exceeded. In very rare events, the northmost tip of the Spectator Precinct experiences some overland flow from Alison Road.

Figure 18 Existing flood flow paths



Source: GRC Hydro

Flood behaviour during flood events on the site include:

- In the 10% AEP, there is a small area of flooding north of the Official Stand with depths < 250mm which represents flooding of 2% of the Spectator Precinct.
- In the 1% AEP, there is greater floodwaters with 5% of the area flooded including north and east of the Officials Stand. However, the hazard is benign with mostly H1 or H2 ratings. The floodwater storage of the racetrack is at or near capacity with a minor 0.07m³ of overland flow per second on to Doncaster Avenue. The pedestrian tunnel connecting Infield and Spectator Precincts is also partially inundated.
- In the PMF, most of the racetrack area (70% of the Infield) and 35% of the Spectator Precinct is flooded, including inundation of the Officials Stand 0.6m above ground floor level. Overland flow spills from the site onto Doncaster Avenue and, Anzac Parade, and all pedestrian and vehicular tunnels are inundated. The site is surrounded by hazardous floodwater in this event.

- The time for floodwater to inundate to depths of greater than 0.3m (where it becomes too dangerous for vehicles to pass through) is 30 minutes. The duration of inundation is less than 1 hour for access points onto Wansey Road and Alison Rd and Darley Rd, and less than 6 hours for all other site exits.

A worst-case assessment of an event scenario of 15,000 patrons in the Spectator Precinct and use of the Infield Precinct for car parking was considered in the TUFLOW model. The results demonstrate no detrimental offsite impacts. Temporary structures on the site may result in a shift in outflows in the PMF from Doncaster Avenue into Anzac Parade or High Street. However this would not increase offsite hazard, flood levels or trafficability of impacted roads.

The FIA confirms the proposal will pose no to very low flood risk to the flood behaviour of the community, and very low risk to infrastructure on the site. It is noted a flood event would impact the Officials Stand, as this will flood during the PMF.

The FIA notes that there is only potential for evacuation during a PMF if sufficient warning as evacuation routes become dangerous shortly after the onset of a flood event (10%, 1% and PMF). Therefore, GRC Hydro recommend a shelter in place strategy to be enacted should a flood inducing event occur. This is discussed further in the Emergency Management Plan prepared by GRC Hydro at **Appendix T**.

The Spectator Precinct is mostly flood free in the PMF and would become a High Flood Island and surrounded by floodwater (except for the Officials Stand, which would be flood liable). The Queen Elizabeth II Stand and the Winx Stand provide viable shelter-in-place venues for the maximum 15,000 people expected during a non-race-day event.

An assessment has been undertaken against the 'Considerations for a Shelter-In-Place (SIP) strategy' (Draft Shelter-in-place Guidelines. DPE, 2022), and GRC Hydro confirm the site has access to sufficient capacity and supplies to manage a short-term (<6 hours) shelter-in-place strategy suitable for managing the expected duration of inundation for the site. There is some capacity for longer durations (up to 48 hours) but only for an estimated 10,000 people.

In accordance with the Red Cross Preferred Sheltering Practices for Emergency Sheltering in Australia and the feedback received from NSW SES, the proposed refuge locations in the Queen Elizabeth II and the Winx Stand are above the height of the PMF.

Cumulative Impact

GRC Hydro have assessed the impact of climate change, with the TUFLOW models run with a rainfall intensity increase of 19.7%. The potential impacts of a 'worst-case' non-race day event are similar to what is expected under current day conditions with no further risk indicated for the community due to climate change and no change to the management strategy.

The FIA also considers the cumulative impact of the approved Hotel development (SSDA 38019507). GRC Hydro also prepared the flood reports for the Hotel SSDA. It is noted the approved stormwater network for the Hotel aims to match the existing overland flow-path site discharge so as to not change flood conditions outside of the development area.

As the concurrent works propose to maintain the existing discharge locations it is expected to have minimal impact on the outcomes of the FIA and evacuation strategy.

6.7. Social and Economic Impact

6.7.1. Social Impact

Overview

Urbis has prepared a Social Impact Assessment (SIA) at **Appendix X**. The SIA is an independent and objective study which identifies and analyses the potential positive and negative social impacts associated with a proposed development. The SIA is guided by the DPHI's Social Impact Assessment Guideline (2023) and Council's Social Impact Assessment Guidelines for Assessing Development Applications.

A summary of the SIA assessment of the potential enhanced positive and mitigated negative social impacts associated with the proposal are outlined in this section.

Methodology

The SIA is informed by a range of activities, including:

- Site visit.
- Review of State and local policies and strategies.
- Analysis of data and identification of the proposal's anticipated area of social influence.
- Engagement with Council at an interview on 1 July and the local community through an online social impact survey, attendance at the door knock and community information session.
- Analysis of field study data, social baseline and field study outcomes.

The DPHI's risk assessment methodology has been applied in the preparation of the SIA.

Assessment

A summary of the SIA assessment of key impacts is provided in **Table 15**.

Table 15 SIA key impact assessment

Impact	Impact description	Mitigated / enhanced assessment
Accessibility	Temporary changes to traffic and parking conditions on surrounding streets	Low negative for residents, businesses, NRDE patrons and transport users in the immediate and surrounding social locality, particularly along Alison Road and Doncaster Avenue during NRDEs (including arrival to and departure from events). Public transport users in the regional social locality will also likely be impacted.
Culture	Diversifying the tourism and cultural, and night time economy sectors	High positive for community members and stakeholders involved in the tourism and cultural, and night time economy sectors in the regional social locality.
Surroundings	Potential for anti-social behaviour in surrounding streets and public spaces	Low negative for residents in the immediate social locality (particularly residents on Doncaster Avenue and adjacent streets) and the surrounding social locality.
Livelihoods	Supporting employment opportunities in event management, tourism and adjacent industries	Medium positive for workers in the event management, tourism and adjacent industries in the regional social locality (Greater Sydney).
Cumulative social impacts	A discussion on cumulative social impacts is outlined the SIA, including: <ul style="list-style-type: none"> ▪ Decreased residential amenity related to noise, traffic and anti-social behaviours ▪ Increased opportunities for local employment and local businesses ▪ Contribution to diversification of the night-time economy 	

Mitigation Measures

The SIA includes a number of recommendations to mitigate adverse impacts and enhance positive impacts, including:

- Implementation of the management measures outlined in the Transport Impact Assessment, CPTED Report and the OMP.

- Preparation of event-specific management plans to manage events.
- Implementation of communication protocols and mechanisms as per the OMP including letterbox drops to local community residents to provide notice prior to the event, and operation of an event hotline.

6.7.2. CPTED

Precinct Management Group have prepared a CPTED Report provided at **Appendix W**. This assessment aims to identify the potential opportunities of crime created by the proposal by assessing the development in accordance with design and place management principles of CPTED.

The Report is informed by:

- Site inspection on 6 April 2023.
- Consultation with the ATC site security management team and the NSW Police (refer **Section 5**).
- Review of local crime statistics between 2022 – 2023, which indicates crime is relatively stable over the 2-year trend.
- Assessment in accordance with the Australian and New Zealand Risk Management Standard AS/NZS 31000:2009.

The CPTED Report identifies the proposal to accommodate non-race day events on the site could have a 'moderate' consequence which under the AS/NZS 31000:2009 is defined as "some harm or injury to people requiring medical treatment, financial loss or damage to property, reputation or operation". However, the site layout plan and use of the Spectator Precinct for events is considered to be generally consistent with the principles of CPTED.

A number of recommendations are proposed to further improve the safety and security of events on the site. These will be considered in addition to the measures outlined in the Emergency Evacuation Plan and Safety and Security Management Plan.

6.7.3. Economic Impact

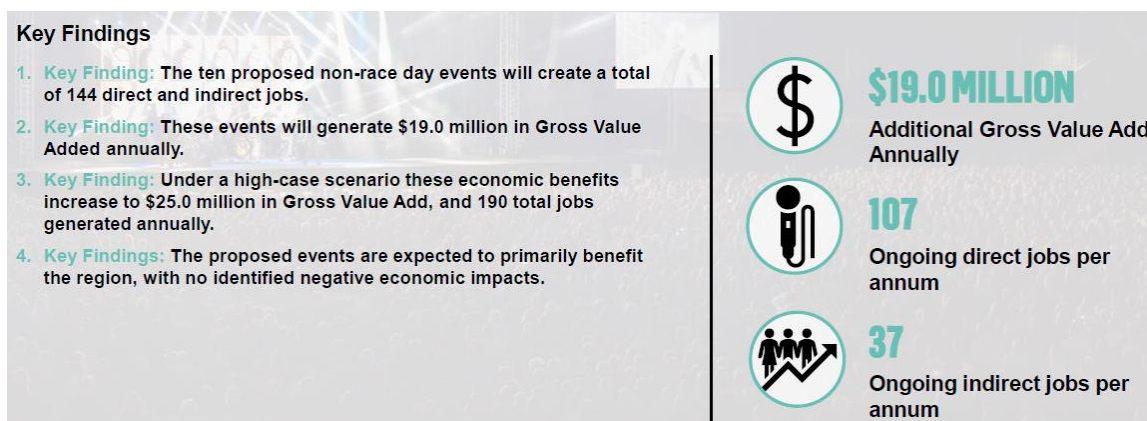
Urbis has prepared an Economic Impact Assessment (**EIA**) provided at **Appendix Y**. The EIA assesses the economic impacts of the proposal in accordance with SEARs no.16.

The EIA utilises REMPLAN to model the potential economic impacts associated with increased events at the site, including value-added expenditure generation, employment generation and flow-on effects of tourism activity on the local economy. A list of potential events was constructed to calculate the economic impact of continued events at the site, and further benchmark data was obtained from Tourism Research Australia.

The 'base case' scenario assumes a range of events between 1, 2 and 3 days whilst the 'high case' scenario assumes events run for a 3-day duration.

The findings of the EIA is summarised in **Figure 19**.

Figure 19 Economic impacts of the proposal



Source: Urbis

6.8. Other Issues

Table 16 Assessment of other environmental issues

Issue	Findings
Infrastructure and utilities	<p>The proposal seeks consent for use of an existing recreational facility which is adequately serviced with stormwater, telecommunication, potable water and gas to accommodate events of up to 50,000 patrons. The use of the site and demand for these services for events up to 15,000 patrons will not have an impact on these existing services.</p> <p>Temporary generators may be utilised to support event operation on a worst-case scenario (events of 15,000 patrons) and provide a secondary energy supply as discussed in the Services Report prepared by IGS (Appendix V).</p> <p>The generators would be subject to a low amount of use (noting they are for temporary use only, in the worst-case scenario) and will be located within the site to ensure there is no direct interface with residential properties. Should the generators be required to support events, the generators will be operated in accordance with the relevant Australian Standards.</p>
Visual impacts	<p>A visual impact assessment (VIA) (Appendix J) has been prepared by Urbis in accordance with requirement 4 of the SEARs. The VIA assesses the visual impact of the erection of three temporary stages in the Spectator Precinct as per the technical layout plan.</p> <p>The VIA does not include ancillary structures such as amenities, toilet blocks or food trucks as these are typical structures that would not be visible due to the scale of the site when viewed from elevated locations. The height and scale of these structures would prevent them from being visible from closer view locations along Alison Road.</p> <p>The VIA assess photomontages of the three stages. The indicative stages have a raised, rectangular floorplate (approximately 2100mm above ground level) with a curved roof form and an overall approximate height of 8.085m. The following three public viewpoints were selected for further analysis:</p> <ul style="list-style-type: none"> ▪ View 1: View west from Wansey Road light rail station. ▪ View 2: View south-east from pedestrian and cyclist path adjacent to light rail. ▪ View 3: View south from pedestrian and cyclist path adjacent to light rail. <p>The selection of these viewpoints has regard to key views within, to and across the site as identified in the Randwick DCP 2013. The VIA concludes:</p> <ul style="list-style-type: none"> ▪ Any impact to views would be of a temporary nature as all structures will be dismantled after each minor event. ▪ The visual catchment of the proposal is small and limited by topography and intervening elements including vegetation and built form.

Issue	Findings
	<ul style="list-style-type: none"> Views from the public domain are predominantly from surrounding transport corridors, and as such visibility is typically from moving situations for short durations of time. The temporary structures will have a 'low' visual impact on View 1 and View 3. The temporary structures will have a 'nil' impact on View 2. From viewpoint 2, all stages are blocked from view by intervening elements (built structures in the site and light rail infrastructure along Alison Road) and do not generate any visual effects or alter the existing visual composition. Physical Absorption Capacity within the surrounding context is high and lessens the visual effects and impacts of the proposal. The proposed use of temporary structures on site will not result in significant impact on views towards existing heritage items on the site. The erection of temporary structures will not adversely impact environmental amenity.
Waste management	<p>The management of waste generated from large events at the site has previously been conducted in accordance with the existing operational management plan prepared by the ATC and approved under previous applications. The ATC and relevant contractors are capable of managing waste associated with large scale events on the site.</p> <p>A Waste Management Plan (WMP) has been prepared by GHD and is appended to this EIS at Appendix U. The WMP provides an assumption of the waste generated for a typical event and a general framework for the management of waste resources onsite. The WMP will be further developed by individual event operators through the preparation of an event-specific waste management plan, to be prepared prior to the commencement of any future non-race day event under the consent.</p> <p>As the Randwick City Council Waste Management Guidelines does not identify waste generation rates for events, GHD have completed a desktop review of local government and NSW EPA waste guidelines to determine a suitable waste generation rate for an indicative waste scenario on the site. The WMP assumes the following waste generation rate per day based upon the worst-case scenario of a 15,000-patron event:</p> <ul style="list-style-type: none"> Events with food and drink – 30,000L waste / day Events with food, drink and alcohol – 45,000L waste / day <p>Waste will include a mix of general waste (non-putrescible and putrescible), recycling, and food waste (including liquid waste).</p> <p>Some waste may also be generated during bump-in and bump-out periods, however this is highly dependent on the numbers and types of vendors and specific event arrangements/functions. Therefore, this will be confirmed by</p>

Issue

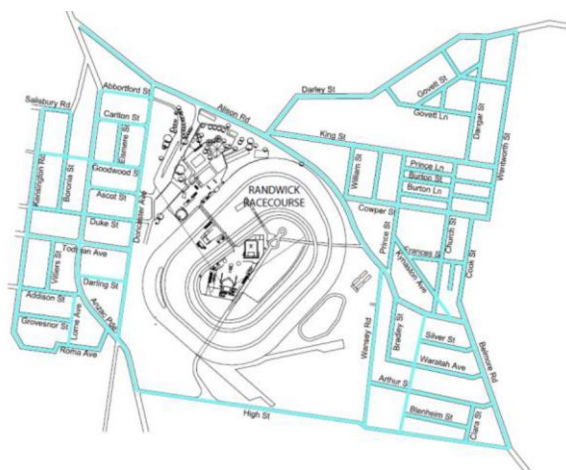
Findings

event operators prior to each event and documented in each event-specific waste management plan.

The following management measures outlines a general framework for management of waste from events:

- During events, waste will be stored within 125 x 240L waste bins for events with food and drink and 188 x 240L waste bins for events with food, drink and alcohol.
- Alternatively, should skip bins be used waste will be stored within 12 x 4,000L skip bins for events with food and drink and 8 x 4,000L skip bins for events with food, drink and alcohol.
- Following the event, event operators will transfer waste (internally within the site) to a central collection point or points for collection. The primary collection point will be the Queen Elizabeth II loading dock within the site which also includes an existing waste compactor.
- The nominal waste vehicle entry point for collections from Queen Elizabeth II loading dock would be from Alison Road via Gate 1 assuming that the collection occurs outside of event hours. Should collections be required within the event hours, this will be outlined in the event-specific WMP based upon the layout of the event.
- Waste collection vehicles will likely be medium rigid vehicles or similar and would be required to enter and exit the site in a forward direction. The access and collection arrangements for waste will be confirmed for each event in an event-specific management plan.
- Food will be disposed of at a minimum at the end of each day.
- Event operators will conduct inspection and litter collection during the event. Following each event, the event operator will be required to collect litter from the site perimeter including surrounding streets:

Figure 20 Areas of waste collection post-event in surrounding streets (streets highlighted in blue)



Source: GHD

Issue	Findings
	<ul style="list-style-type: none"> ▪ Signage will be provided to all bin stations and in back of house areas. <p>In summary, the site has existing infrastructure and practices to manage waste generation from large events. Event operators will be required to prepare an event-specific waste management plan prior to each event.</p>
European heritage	<p>Urbis have prepared a Heritage Impact Statement (HIS) to assess the impact on the heritage significance of the site associated with non-race day events (Appendix P). The HIS has been prepared in accordance with the relevant guidelines and assesses the Royal Randwick Conservation and Management Plan (CMP) prepared by GML Heritage (2006).</p> <p>In determining the impact of the proposed development on heritage significance, the HIS finds:</p> <ul style="list-style-type: none"> ▪ The proposed works will not alter the important pattern of land uses across the site. The type of events proposed as part of this application are in keeping with the general use of the site as a recreational facility (major). While they do not relate specifically to thoroughbred racing and stabling, the events proposed provide an opportunity for new visitors to visit the historic site for reasons other than thoroughbred racing and stabling. This enhances the use of the site from a heritage perspective as it encourages a more diverse and broader audience. ▪ The proposed additional uses of the site will facilitate the overall increased amenity of the site, and the precinct's future as an economic and tourism destination. In addition, due to the existing and historic use of the place, the site is overall equipped to accommodate other types of events that cater to a similar amount of people then race days. ▪ There are no permanent changes proposed to the site. ▪ All structures used to support events are temporary and will also be removed within 10 days of any event and will not cover any items of significance in their entirety or be fixed to significant fabric. The proposed structures are temporary and lightweight and they do not require any permanent physical impacts or changes to the site to facilitate the installation or removal. ▪ There are no proposed physical works to any of the significant built elements across the site identified as 'Exceptional' or 'High' significance in the 2006 CMP. ▪ The proposed works will not obscure or detract from the ability to read Royal Randwick as a large-scale and significant racecourse site as all structures are temporary. The works will therefore have a negligible visual impact on the C13 Randwick Heritage Conservation Area. ▪ Temporary structures will have no impact on the setting or character of surrounding heritage items including State Heritage item 01384,

Issue	Findings
	<p>Centennial Park, Moore Park, Queens Park due to the separation of the two sites by Alison Road and the low scale of any temporary structure.</p> <p>In summary, there will be no physical or detrimental impact on the significant heritage built, landscape or view components of the site.</p> <p>The HIS recommends the following mitigation measures:</p> <ul style="list-style-type: none"> ▪ The construction and event methodology for all set-up should include the identification and a protection methodology for the significant buildings and landscaping elements. This is to ensure works associated with the erection of temporary structures does not impact the significant elements on the site. ▪ All temporary structures must be removed within the allotted timeframe (10 days) to ensure views within the Conservation Area are retained during non-event days.
Historical Archaeology	<p>Urbis have prepared a Historical Archaeological Impact Assessment (HAIA) (Appendix R) to assess the impact to potential historical archaeological resources associated with non-race day events.</p> <p>In determining the impact of the proposed development on archaeological sensitivity, the HAIA notes:</p> <ul style="list-style-type: none"> ▪ The proposed non-race day events will predominantly utilise existing structures and services, with no anticipated impacts to the ground surface associated with the proposal. ▪ While some temporary structures may be erected, these are not anticipated to disturb the ground surface although may include the use of small tent pegs to stabilise temporary marquees and similar items. This is consistent with existing activities at the subject area and does not constitute a potential impact to archaeological relics. ▪ It is therefore determined that the proposed works are unlikely to result in any impacts to the ground surface or archaeological relics. <p>The HAIA confirms support for the proposal as there are no impacts resulting from the proposal.</p>
Aboriginal Archaeology	<p>Urbis have prepared an Aboriginal Objects Due Diligence Assessment (ADD) (Appendix Q) to assess impacts on any Aboriginal cultural heritage values on the site. The ADD concludes:</p> <ul style="list-style-type: none"> ▪ No Aboriginal objects or Aboriginal places are registered within the subject area. ▪ The subject area and surrounding landscape have been previously assessed through various archaeological investigations. This includes test excavation within a section of the Leger Lawn area, which is located along the southern boundary of the Spectator Precinct. This excavation identified high disturbance with fill to considerable depth overlying natural soils.

Issue	Findings
	<ul style="list-style-type: none"> ▪ Geotechnical findings confirm the impact of historical activities on the soil profile, with disturbance being encountered to a minimum depth of 1.1m-3m below the current ground surface. There is nil to low potential for Aboriginal objects within the disturbed soil layers. ▪ The subject area has moderate archaeological potential for artefact scatters / campsites, burials, isolated finds, middens and PADS within intact natural soil at depths exceeding 1.1/3m below the current ground surface level. ▪ The proposed works will not result in any ground disturbance that could impact Aboriginal objects beneath the fill. ▪ The proposal will not result in any significant ground disturbance activities because it will use a combination of existing infrastructure and temporary marquees and/or stalls. No permanent structures or services are proposed associated with the development. <p>An unexpected finds procedure is not required for the proposed application as no significant ground works or ground disturbance will occur as part of this application, and as such there is no scope for unexpected finds to occur.</p> <p>Accordingly, there are no impacts on Aboriginal archaeology anticipated resulting from the current proposal.</p> <p>The ADD was submitted to DPHI and subsequently Heritage NSW on 19 September 2023. Heritage NSW confirmed email on 25 September 2023 that an ACHAR is not required for the works and that the standard SEARs requirement does not apply to the application. Evidence of this consultation is appended to the ADD.</p>
Trees and landscaping	<p>There is no impact to any existing vegetation on the site as a result of the proposal. Installation of temporary structures will not require removal of any trees or shrubs.</p> <p>The proposal will contribute to retaining the canopy coverage of the site through use of temporary structures which will have no impact on vegetation.</p>
ESD	<p>The principles of ecological sustainable development (ESD) aim to use, conserve and enhance community resources so that quality of life can be maintained into the future. The proposal responds to these principles through the use of an existing, established recreational site to accommodate non-race day events. The proposal will use existing infrastructure on site including waste storage areas, waste compactor, the loading dock, existing Spectator Precinct lighting and site services to support events. These strategies align with ESD principles and ensures existing resources are used.</p> <p>Where additional energy is required, temporary diesel generators may be used by event operators to supplement site services. Generating energy onsite and off the grid will reduce the energy requirements of the site and the proposal, contributing to a reduced dependence on the electricity network. Furthermore,</p>

Issue	Findings
	<p>diesel generators throughout the site will reduce the amount of additional cabling required from the existing switchboard.</p> <p>Implementation of these measures will improve the energy efficiency and sustainability of the proposal during the operation phases of the development.</p> <p>Further discussion of the ESD measures implemented in the proposal is outlined in the ESD Report at Appendix BB.</p>
Health impacts	<p>The SEARs require consideration of health impacts associated with the proposal. This EIS and appended technical reports provide an assessment of potential health impacts and finds:</p> <ul style="list-style-type: none"> ▪ The site is suitable to accommodate the development as the accommodation of recreational events on the site is consistent with the existing use of the Racecourse since 1883. The development does not involve significant ground disturbance and as such will not harm health through exposure to below ground surfaces. ▪ The proposal seeks to encourage use of public transport (particularly the Light Rail) and walking / cycling to events through the management measures identified in the Transport Impact Assessment prepared by PTC (Appendix N). This will encourage physical activity and sustainable modes of transport which is expected to have a positive impact on engaging in health lifestyles. ▪ The site is located within the Randwick Strategic Centre in walking distance to a range of existing retail, hospitality, local and civic services. The proximity to these services will provide an opportunity to walk to surrounding services prior to and following events which will have a positive implication on overall health and stimulate the local economy. ▪ Existing landscaping across the site is retained to reduce the urban heat island effect, improve interaction with nature and contribute to creating a cooler environment for patrons to the site. ▪ Odour and offensive smells from events or waste management will be managed by event operators to ensure there are no adverse impact on event patrons or surrounding properties. The site is of a significant size and as such all odour will be contained and managed within the site. ▪ Adoption of noise management and mitigation measures recommended by GHD (Appendix L) will reduce ensure noise generated from events do not cause an adverse impact or health consequences on residential properties surrounding the site. ▪ Bump in and bump out activities are temporary and will be wholly undertaken within 10 days prior to and following events. There are not anticipated to be impacts on human health from erection of temporary structures.

7. Evaluation

This EIS has been prepared in support of SSD-63536466 to assess the environmental, social and economic impacts of the proposal for non-race day events between 5,000 – 15,000 patrons (at any one time) for 10 events per year (up to a maximum of three days per event) at the Randwick Racecourse. The EIS has addressed the issues identified in the SEARs and has been prepared in accordance with Part 8, Division 5 of the EP&A Regulation.

The proposal represents an orderly and economic use of the site as it will continue an existing use of the site as a recreational facility. The ATC are experts in managing events of this size and the site has existing infrastructure and processes to service these events. The proposal will increase the vibrancy of the site outside of race day periods and support NSW as a thriving visitor economy with a range of corporate, consumer, arts and cultural events, managed by the implementation of a robust management framework.

The proposal will contribute to the ATC's objective to support the ongoing pre-eminence of the Royal Randwick Racecourse as the premier recreational destination in Sydney.

The proposal will promote the diversification of the ATC business and revenue stream and as such will assist in securing the future of the racecourse, a recognised recreation, tourist and entertainment facility. The scale of the site can comfortably accommodate non-race day events of between 5,000 patrons to 15,000 patrons, including the ancillary temporary structures which will have no adverse impact on view corridors.

The proposal is justified for the following reasons:

The proposal satisfies the applicable local and State strategic and statutory planning controls:

- ✓ The proposal is consistent with the key statutory land use and planning objectives of the EP&A Act and the Randwick LEP 2012. An assessment of the proposal against relevant statutory planning provisions demonstrates the proposal achieves the intent and is consistent with the relevant provisions.
- ✓ The proposal will support the Randwick LGA's tourist and entertainment economy consistent with the strategic objectives for the area and contribute to the ongoing status of the racecourse as a key recreational asset in the Eastern City District.

The proposed accommodation of nonrace day events on the site can be appropriately managed by the Australian Turf Club:

- ✓ The site is a private recreation space that accommodates a variety of events over the past 150 years. The historic use of the site for race day and non-race day events has led to the refinement of the crowd management procedures at Randwick Racecourse which has been adopted in the draft Operational Plan of Management. This extensive experience will ensure any functions will run smoothly with minimal impact on the surrounding residents.
- ✓ The draft Operational Plan of Management and accompanying reports will be further developed and refined for each event with input from the event operator.

Cumulative impacts can be managed through ongoing consultation with key stakeholders:

- ✓ Non-race day events under this application will be managed by a KSG formed to oversee the environmental performance of events. This will ensure all potential impacts of events are considered prior to the event occurring and can be effectively managed during and after the event occurrence.
- ✓ The ATC enjoys a long-standing and effective relationship with stakeholders in the surrounding area including NSW Police Force, MEOG and local residents to ensure a positive dialogue is maintained for the resolution of complaints and community dissatisfaction during future events.
- ✓ Regular consultation with the MEOG prior to scheduling events will occur under this application. This is a key measure to prevent cumulative impacts to the Moore Park Precinct and will ensure non-race day events are coordinated with other events in the Moore Park precinct and avoid scheduling of events simultaneously (where possible). This is similar to the management of previous large events on the site, including the Music Festival consent SSD-6134.

- ✓ Race day events will continue to be prioritised as the core use of the site.

Events will deliver a suitable use of the site that responds to the site opportunities and constraints:

- ✓ The site is of a sufficient size and capacity to accommodate events of this size. The maximum patrons for race day activities are up to 50,000 patrons, with a typical race day event attracting between 35,000 – 40,000 patrons. The site can comfortably accommodate 15,000 patrons within the Spectator Precinct.
- ✓ Events will not be permitted within the Stables Precinct on the south-eastern corner of the site or Services Precinct where the Light Rail yards are located, to ensure there is no impact to horse stabling and services during events.
- ✓ The indicative layout plan demonstrates how site layout will maximise permeability and connectivity through the Spectator Precinct through placement of large structures adjacent to existing built structures to enable clear pathways through the site. The orientation of stages inwards towards the site will ensure sound and light is directed to patrons as required and minimise noise amelioration and light spill to the residential areas to the north-east and west along Doncaster Avenue.
- ✓ The proposed approach to erect any temporary structure within the Spectator Precinct is sought to provide sufficient flexibility to future event operators based upon event-specific requirements. As discussed in this EIS, the provision of ancillary temporary structures is consistent with the site operation for race events and will be erected within 10 days preceding the event and dismantled and removed from the site within 10 days following the event, and as such any impact will be temporary and short-term.

Key environmental impacts associated with events can be managed:

- ✓ PTC consultants consider that traffic impact from patrons and vehicles departing the site would not result in adverse impacts as traffic exiting the site will be on an infrequent basis for a short duration following each event and mitigation measures are proposed to reduce the impact of patron and vehicle noise.
- ✓ The site currently accommodates 4,074 parking spaces and as such these facilities provide sufficient capacity to accommodate parking, drop off and pick up movements. The proposed mitigation measures to incentivise use of public transport will reduce demand for these facilities.
- ✓ Noise modelling completed by GHD demonstrates music and non-music events can comply with the proposed noise criteria. Prior to any music event, an event specific noise management plan would be prepared by the operator detailing how the requirements of the noise management plan would be met. This would include noise modelling of their proposed sound system configuration showing how the adopted noise limits could be met at all receiver locations. In addition, GHS recommend a PMNS along the site boundary (representative of the most-affected receivers) to determine compliance during rehearsals and events.
- ✓ The LIA demonstrates that any lighting impact to amenity of residents or road users would be of a temporary, short-term nature as all lighting structures will be dismantled after each non-race day event and as such is acceptable. The provisions of AS/NZS 4282:2023 do not technically apply to the proposed installation of three temporary stage lighting structures. Any future stage lighting would be oriented inwards towards the site and the event patrons, to minimise spill lighting as much as possible within the limits of the lighting function.

The proposal is highly suitable for the site:

- ✓ The proposal will allow the ongoing use of the site as a major recreation facility which is permissible with consent and consistent with the RE1 zone objectives. Further, there are no significant environmental constraints that would limit the proposal from being accommodated at the site.

The proposal is in the public's best interests:

- ✔ The proposal will create 107 ongoing indirect jobs per annum and 37 ongoing indirect jobs per annum. The proposal will stimulate local investment and contribute significant economic output and value add to the economy through contribution of \$19 million gross value added annually.
- ✔ Subject to the various mitigation measures recommended by the specialist consultants, no adverse, social or economic impacts will result from the proposal in terms of traffic, noise and vibration, or views during ongoing operation of events.
- ✔ Engagement with relevant community, government and agency stakeholders has been undertaken with respect to the proposed development, with no major issues having been raised through the consultation processes. It is noted that ongoing consultation with the community as part of the public exhibition of this SSDA.

The assessment outlined within this Environmental Impact Statement and accompanying technical reports concludes that the project objectives can be achieved whilst balancing the wide range of competing urban design, environmental, economic and social considerations and is therefore in the public interest.

In view of the above, it is considered that this SSD application has significant merit and should be approved by the Minister subject to the implementation of the mitigation measures described in this report and supporting documents.

Disclaimer

This report is dated 9 September 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Australian Turf Club (**Instructing Party**) for the purpose of State Significant Development Application (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

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

Appendix A SEARs Compliance

Appendix B Statutory Compliance

Appendix C Mitigation Measures

Appendix D QS Report

Appendix E Site Plans

Appendix F Technical Layout Plan

Appendix G Operational Management Plan

Appendix H Security Crowd Management Plan

Appendix I Emergency Evacuation Plan

Appendix J Visual Impact Assessment

Appendix K Lighting Impact Assessment

Appendix L Noise Impact Assessment

Appendix M BDAR Waiver

Appendix N Transport Impact Assessment

Appendix O Preliminary Site Investigation

Appendix P Heritage Impact Statement

Appendix Q Aboriginal Due Diligence Assessment

Appendix R Historical Archaeology Impact Assessment

Appendix S Flood Impact Assessment

Appendix T Flood Emergency Management Plan

Appendix U Waste Management Plan

Appendix V Infrastructure Assessment

Appendix W CPTED Report

Appendix X Social Impact Assessment

Appendix Y Economic Impact Study

Appendix Z Consultation Outcomes Report

Appendix AA Environmental Management Plan

Appendix BB ESD Report

Appendix CC Embodied Emissions Form

