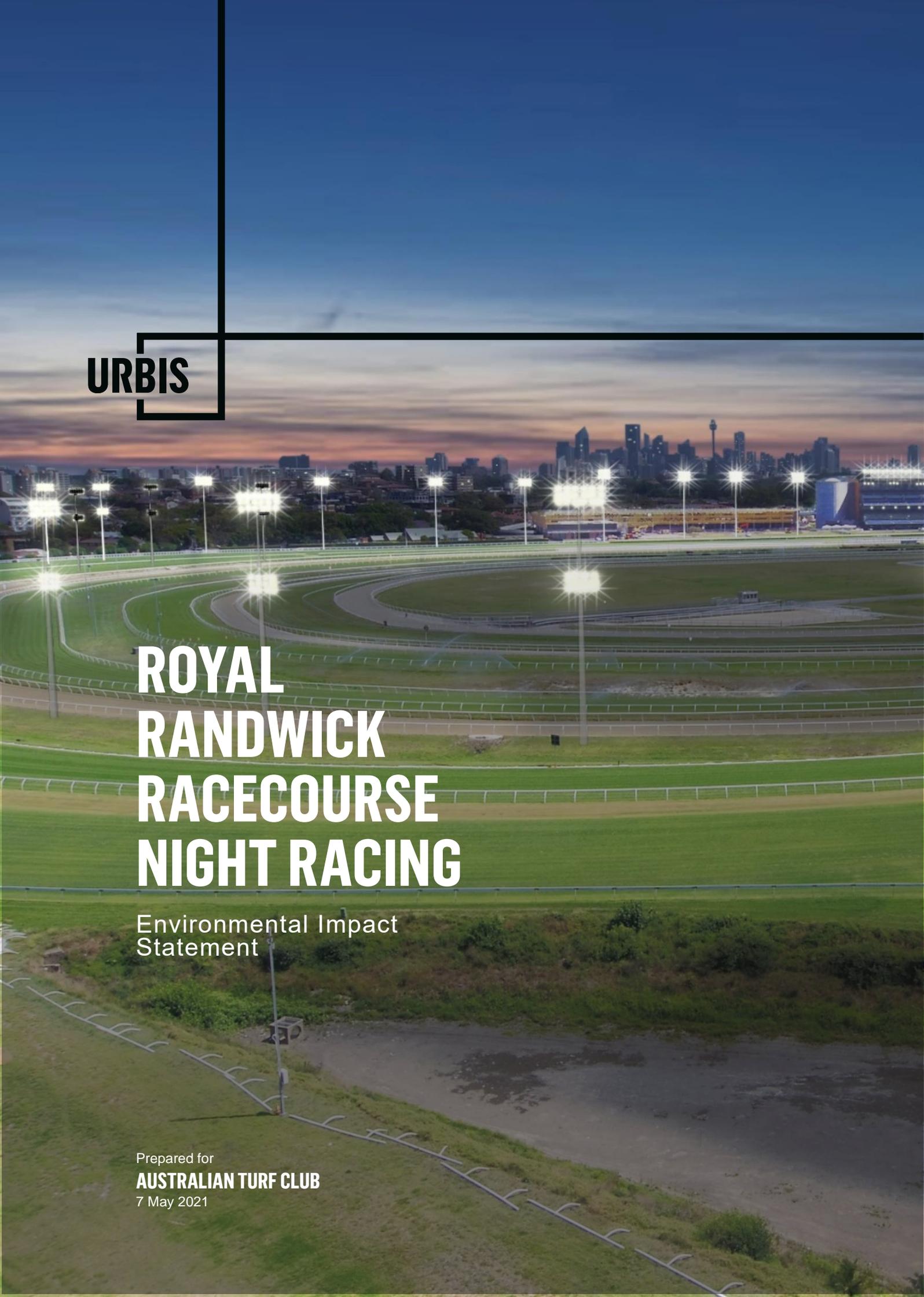


The logo for URBIS, consisting of the word "URBIS" in a bold, black, sans-serif font. The letters are contained within a white square frame that has a thick black border. The frame is positioned in the upper left quadrant of the page, overlapping the dark blue sky and the top edge of the racecourse.

**URBIS**

A wide-angle, high-angle photograph of the Royal Randwick Racecourse at dusk. The track is illuminated by numerous tall, bright stadium lights, creating a strong contrast with the darkening sky. The city skyline of Sydney is visible in the background, with the Sydney Tower Eye prominent on the right. The foreground shows the green grass of the racecourse and a dirt area with some vegetation.

# **ROYAL RANDWICK RACECOURSE NIGHT RACING**

Environmental Impact  
Statement

Prepared for  
**AUSTRALIAN TURF CLUB**  
7 May 2021

**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

Director	Sarah Horsfield
Senior Consultant	Richard Barry
Consultant	Eliza Scobie
Assistant Planner	Anais Sarkissian
Project Code	P0023830
Report Number	FINAL REPORT – 7.5.2021

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**No table of figures entries found.**

# SIGNED CERTIFICATION

This Environmental Impact Statement has been prepared in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*.

Environmental Impact Statement prepared by:

<b>Names:</b>	<b>Sarah Horsfield</b> Master of Environmental Law (USyd), Bachelor of Town Planning (UNSW)  <b>Richard Barry</b> Bachelor of Planning, UNSW
<b>Address:</b>	Urbis Pty Ltd Level 8, Angel Place, 123 Pitt Street Sydney NSW 2000
<b>In respect of:</b>	Australian Turf Club

Applicant and Land Details:

<b>Applicant:</b>	<b>Australian Turf Club C/- Urbis Pty Ltd</b>
Applicant Address:	Level 8, Angel Place, 123 Pitt Street Sydney NSW 2000
Land subject to application:	Royal Randwick Racecourse
Lot and DP:	Lot 2009 in DP 1169042
Project:	Royal Randwick Racecourse Night Racing

Declaration:

We certify that the content of the Environmental Assessment, to the best of our knowledge, has been prepared as follows:

- In accordance with the requirements of the *Environmental Planning and Assessment Act 1979 (EP&A Act)* and *Environmental Planning and Assessment Regulation 2000 (EP&A Regulation)*;
- The information contained in this report is true in all material particulars and is not misleading.

<b>Name</b>	Sarah Horsfield Director	Richard Barry Senior Consultant
<b>Signature:</b>		
<b>Date:</b>	7 May 2021	7 May 2021

# EXECUTIVE SUMMARY

This Environmental Impact Statement (**EIS**) has been prepared on behalf of the Australian Turf Club (**ATC**) in support of a State Significant Development Application (**SSDA**) for night racing at Royal Randwick Racecourse (**the site**).

The proposal for night racing at Royal Randwick Racecourse (**RRR**) has been in planning for a long time, including consultation with Department of Planning, Industry and Environment (**DPIE**) and the community in 2017 and 2021.

This EIS has been prepared in response to Secretary's Environmental Assessment Requirements (**SEARs**) issued on 21 September 2017 (amended 8 December 2017). The SEARs were reviewed in April 2020 and April 2021 to confirm the SEARs remain applicable, through consultation with DPIE's Major Projects team, pursuant to Clause 3 of Schedule 2 of the *Environmental Planning & Assessment Regulation 2000* (**the Reg**). This EIS contains an assessment of the proposal against the relevant considerations under section 4.15 of the *Environmental Planning and Assessment Act 1979* (**the Act**).

Pursuant to Schedule 2 Clause 4 of the *State Environmental Planning Policy (State and Regional Development) 2011* (**SRD SEPP**), the proposed development is considered State Significant Development (**SSD**), as the proposal will have a Capital Investment Value (**CIV**) greater than \$10 million.

## The Site

Royal Randwick Racecourse has an extensive history within Australia's racing culture for over 150 years, located within the Randwick City Council (**RCC**) Local Government Area (**LGA**).

The site is one of the largest recreation areas in the Eastern Suburbs of Sydney. It benefits from a highly strategic location, within a major open space and entertainment precinct that includes Moore Park Golf Course, the Moore Park Sport Precinct (including Sydney Cricket Ground and Allianz Stadium), the Entertainment Quarter and Centennial Park. The site is also positioned between two key sub-regional road corridors, being Alison Road and Anzac Parade, the latter being subject to transformation into a more vibrant and active precinct in the future, based upon the strategic planning for the Kensington and Kingsford Town Centres Strategy and planning proposal undertaken by RCC.

The site is legally described as Lot 2009 in Deposited Plan 1169042 and is Crown Land, leased to the ATC who own and operate the racecourse.

## Proposed development

The ATC has a vision to reinforce the reputation of RRR as a world class racing venue by establishing new night racing events during the Spring to Autumn period. Night racing events have become a popular activity both nationally and internationally as communities are trending towards embracing alternative night time economy leisure and recreation activities.

The demand for this type of event is clear in Australia, with existing night racing at Canterbury Racecourse in NSW, night racing at Moonee Valley in Victoria, and the recent approval of night racing at the Gold Coast, which was heavily supported by the QLD State Government through a \$31.5 million investment towards its transformation to night racing as part of its Covid recovery program.

The scope of the proposal subject to this SSD application includes the following:

- Consent for 16 night racing events per annum (concentrated between October and April), broken into:
  - 12 minor race events per annum (up to 10,000 patrons).
  - 4 medium race events per annum (10,001 to 15,000 patrons).
- Installation of new trackside lighting to facilitate televised broadcasting.
- Upgrade of the existing Spectator Precinct lighting for patron safety.
- Permanent diesel generators for electricity generation for trackside lighting.
- Staging of physical works.

Overall, the night racing events will create a new spectator experience, attract new audiences and enhance the premier horse racing status of RRR as a racing venue on the state, national and international stage. The night racing events will provide an alternative night time cultural and sporting event with opportunity to provide increased tourism and boost Sydney's night-time economy – important for the recovery from the Covid pandemic.

## **Consultation**

The proponent team has undertaken consultation with DPIE, State agencies, Council, service providers and stakeholders as required by the SEARs. Communication and engagement with the local community has been ongoing since 2017 and community feedback has been used to inform the final scheme, including on proposed patron capacity, lighting design and event management. Follow-up consultation with the community was also undertaken in 2021, prior to finalisation of the EIS, to inform the community of how their feedback has been adopted.

The issues discussed and raised during the consultation and preparation of this EIS, have been addressed in detail in Section 5 of the EIS.

## **Planning Framework and Assessment**

This EIS assesses the development as proposed with regard to relevant planning instruments and policies, and outlines the mitigation measures to ensure the proposed development does not result in unreasonable or adverse environmental effects. Additionally, the proposed development satisfies the SEARs as demonstrated in the EIS.

### Impact Assessment

Potential impacts of the proposed development largely relate to light spill, visual impact, noise and traffic impacts. However, each of these potential impacts have directly informed the proposed scheme and informed appropriate mitigation measures to reduce impacts on surrounding stakeholders, including:

- Using the latest lighting technology and careful positioning of light columns to manage light spill and be fully compliant with industry standards for managing light spill on surrounding receivers.
- Minimising height of light columns where possible and using materials that reduce the visual impact of the columns against the sky and the landscape. In addition, RRR will continue to facilitate revegetation along its site boundary over time to further soften visual impacts.
- Night racing events will operate in accordance with the site's Event Operational Management Plan (EOMP) and Noise Management Plan, to reduce noise impacts on surrounding sensitive receivers. The event will end at 10pm to avoid disruption late into the night. The ATC has a successful history of implementing its events management procedures to manage large gatherings of people safely and efficiently at events. The proponent is committed to continuing this by implementing modified procedures specific to night racing events to preserve the amenity of surrounding residential area as patrons leave the venue after dark.
- Night racing events will be capped at 15,000 patrons to minimise impacts on the surrounding network during peak traffic periods. Public transport and alternative transport modes will be encouraged to reduce traffic generation associated with night racing events and to take advantage of the Sydney Light Rail network that directly services the site.

### Suitability of the site

- RRR is the premier thoroughbred racing venue in NSW. The proposed development will enhance the spectator experience and secure RRR's long term future as the 'jewel in the crown' of Sydney racing. This will strengthen the ATC's position and ongoing operation of the racecourse into the future.
- Night racing is becoming a popular tourism attraction in Australia and internationally. It is important that night racing commence at RRR for it to remain competitive with thoroughbred horse racing events elsewhere and continue to attract thoroughbred horse racing into the future. There is a risk that if night racing does not occur at RRR, the racing legacy at RRR and in NSW will decline.
- RRR benefits from its close proximity to Sydney CBD and existing public transport.
- There are no known site conditions which would prevent the development proceeding.

- Where there are environmental impacts, these can be suitably managed through mitigation measures and design outcomes.

Based on the above points, the site is suitable for the proposed development.

#### Public interest

The benefits of the proposed development include:

- Provide new amenity through alternative night time activities in the locality.
- Support continued direct and indirect employment opportunities for the local community.
- Opportunities to indirectly grow employment opportunities in the surrounding area associated with new night recreation and leisure activities.
- Support NSW's economic recovery from the Covid pandemic.
- Continue to strengthen RRR as a significant tourism and leisure venue, which contributes (direct and indirect) over \$1.88 billion per annum to the NSW economy.

It can be concluded that on balance, the benefits of the development outweigh any adverse impacts and as such, the development is in the public interest.

**In view of the above, it is considered that this SSD Application has significant merit and should be approved by DPIE and the Minister for Planning and Public Spaces.**

# 1. INTRODUCTION

## 1.1. PURPOSE OF THIS REPORT

This Environmental Impact Statement (EIS) has been prepared on behalf of Australian Turf Club (ATC) in support of a State Significant Development (SSD) Development Application (DA) for night racing at Royal Randwick Racecourse (the site).

This EIS has been prepared in response to Secretary's Environmental Assessment Requirements (SEARs) issued on 21 September 2017 (amended 8 December 2017). The SEARs were reviewed once more in April 2020, through consultation with DPIE's Major Projects team Principal Planning Officer, pursuant to Clause 3 of Schedule 2 of the EP&A Regulation. This EIS also provides an assessment of the proposal against the relevant considerations under Section 4.15 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

This report includes assessment of compliance with the statutory and strategic planning framework, and all other potential environmental impacts identified through the preparation of this SSDA. Further, this report has been prepared with consideration of the *draft Environmental Impact Assessment Guidance Series* released in June 2017 and the *Preparing an Environmental Impact Statement* Exhibition Draft released in December 2020.

This EIS is structured in the following manner:

- An introduction to the project, including project objectives, project background and analysis of feasible alternatives.
- Identification of the site and its strategic context, including relevant NSW Planning Strategic Framework.
- Assessment and evaluation of the proposed development against relevant legislation, statutory planning policies, environmental planning instruments and development controls.
- A summary of community engagement activities.
- Consideration of key planning issues relating to the proposed development, including a response to issues identified in the SEARs.
- A comprehensive evaluation of the project.

This EIS should be read in conjunction with all supporting documentation appended to this report at **Appendix A - Appendix Q**

## 1.2. APPLICANT DETAILS

Applicant details are identified in the following Table 1.

Table 1 Applicant details

Parameter	Proponent
Company	Australian Turf Club Limited
ABN	81 148 157 288
Primary Principal	Piers Thompson, Executive General Manager

### 1.3. PROJECT OBJECTIVES

Royal Randwick Racecourse has an extensive history within Australia’s racing culture for over 150 years. The site is one of the largest recreation areas in the highly urbanised Eastern Suburbs of Sydney and is located within a major open space, recreation and entertainment precinct that includes a range of passive and active recreation areas and sporting facilities, including 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 **Figure 1**.

The proponent has a vision to reinforce the reputation of RRR as a world class racing venue by establishing new night racing events. Night racing events have become a popular activity both nationally and internationally.

As such, the scope of the proposal includes:

- Consent for 16 night racing events per annum (concentrated between October and April).
- Installation of new trackside lighting to facilitate televised broadcasting.
- Upgrade of the existing Spectator Precinct lighting for patron safety.
- Permanent diesel generators for electricity generation for trackside lighting.
- Staging of physical works.

Overall, the night racing events will create a new spectator experience, attract new audiences and enhance the premier horse racing status of RRR on the state, national and international stage. The night racing events will also provide an alternative night time cultural and sporting event with the opportunity for providing increased tourism and boosting Sydney’s night-time economy as we recover from the Covid pandemic.

Figure 1 Regional Context Map



Source: Urbis

## 1.4. PROJECT BACKGROUND

### 1.4.1. Request for SEARs in 2017

The proposal for night racing at RRR has been in planning for a long time, including consultation with DPIE and request for SEARs in 2017. The '2017 Proposal' comprised of:

- Up to 16 night racing events per annum
  - Held between Spring to Autumn (October to April)
  - Held on Thursday, Friday, Saturday, or Public holiday nights.
  - Held between 6 – 10pm
  - Various scale of racing events, from small scale (<10,000 pax) to signature events (35,000+ pax).
- Installation of trackside lighting infrastructure to facilitate night racing and televising the events.
- Upgrade to precinct lighting to provide maximum safety to patrons and the community within the vicinity of the precinct.

Following the Scoping Meeting with DPIE on 11 July 2017 to discuss the proposal, consultation was undertaken with the community and key stakeholders as follows:

- Government Agencies/ Authorities and service providers
- Local MPs
- Racing Stakeholders
- Neighbours and community action groups.

The SEARs for night racing at RRR was issued on 21 September 2017 and amended 8 December 2017.

The proponent was close to submitting an EIS for night racing in late 2017, until it was decided to delay the project. Refer to Section 1.4.4 to understand how the 2017 Proposal has informed the development of the details for this project, including stakeholder consultation undertaken in 2017, changes to the proposed development and mitigation measures to minimise environmental impacts.

### 1.4.2. Review for SEARs in 2020 and 2021

A summary of the SEARs issued by DPIE on 21 September 2017 is provided at **Appendix A**. The table identifies where each requirement has been addressed within this EIS and supporting documentation.

Noting that further consultation is required with DPIE after two years from the date of issue, a review of the SEARs was requested on 23 March 2020. It was advised by DPIE in an email response dated 7 April 2020 that, given the proposal remains largely unchanged, the existing SEARs remain applicable, subject to the below updated strategies being addressed in this EIS:

- NSW State Infrastructure Strategy 2018 - 2038;
- The Greater Sydney Region Plan 2018 – *A Metropolis of Three Cities*;
- Eastern City District Plan 2018; and
- Future Transport 2056 and support plans.

Further consultation with DPIE on 8 April 2021 confirmed the SEARs remain applicable and no further changes are required.

### 1.4.3. Preliminary Community Engagement

The project team has consulted with a range of stakeholders on the proposed night racing at RRR, including comprehensive stakeholder consultation (Stage 1) undertaken in 2017. Key themes and issues raised during Stage 1 consultation included:

- **Crowd management** – including anti-social behaviour by racegoers, litter in surrounding streets, and impacts on the amenity of residents.
- **Noise** – from traffic, the public address system by race callers, outdoor entertainment and amplified music (particularly at the conclusion of race meetings); and movement of horse floats at the conclusion of racing events.
- **Traffic and parking** – including impacts on the road network by vehicles accessing RRR during peak hour (particularly on Alison Rd and High St) and parking in local streets.
- **Public transport** – including the capacity of the public transport system to accommodate spectator access during peak commuter periods.
- **Hours of operation and event scheduling** – including concerns about the potential for large scale night events, such as the Everest and for events being held on consecutive days/nights.
- **Light spill** – and expected impact on residential properties in the surrounding area.

Further consultation has subsequently been undertaken in 2021 to advise stakeholders on the changes made to the design in response to comments in 2017.

The submissions and findings of this community engagement strategy are detailed within the Community and Stakeholder Report **Appendix O** and addressed within this EIS (refer to **Section 5**). These findings have been used to inform and guide the proposed mitigation measures to manage the impacts of the proposal on the surrounding environment and stakeholders. The ATC will continue consultation with stakeholders throughout the planning process.

### 1.4.4. Scheme Development and Analysis of Feasible Alternatives

#### Site suitability and feasible alternatives

The proposal for night racing at RRR has been in planning for a long time. Whilst the ATC currently hosts night racing at Canterbury Park Racecourse, it is the proponent's vision that night racing at RRR will enhance the spectator experience and secure RRR's long term future as the 'jewel in the crown' of Sydney racing. This will strengthen the ATC's position and ongoing operation of the racecourse into the future.

Night racing is becoming a popular tourism attraction in Australia and internationally. The proponent considers it important that night racing commence at RRR to remain competitive with thoroughbred horse racing events elsewhere and continue to attract thoroughbred horse racing into the future. It also fits with changing expectations on entertainment, recreation and lifestyle in Australia. There is a risk that if night racing does not occur at RRR, it will diminish the racing legacy at RRR and horse racing in NSW will decline.

RRR benefits from its existing profile as NSW's premier thoroughbred horse racing venue, close proximity to Sydney CBD and existing public transport. Based on these merits and the above points, it is the proponent's view that the site is suitable for the proposed night racing and there are not any feasible or appropriate alternative locations to host night racing events of this scale elsewhere in NSW.

#### Scheme development

The development of the proposal has undergone a progressive review and development of the scheme. In 2017, the proponent consulted with DPIE and requested SEARs for proposed night racing at RRR, similar to the proposed development detailed in this EIS.

The findings of the 2017 consultation is detailed in **Section 5** and **Appendix O**. Key learnings from the 2017 consultation were primarily focused on potential lighting impacts and traffic impacts caused by night racing events. Whilst these potential impacts were predicted by the proponent prior to consultation, further investigation was undertaken on these matters.

Based on further investigation in 2017, the proponent selected to postpone progressing the development, primarily to allow lighting technology to develop and provide a desired solution and for the construction of the

Sydney Light Rail to be completed. The postponement of the project has provided the proponent with additional information on potential traffic impacts, confirmed capacity of the Sydney Light Rail (following its completion in 2019/2020), and validated the anticipated success of signature events at RRR and the growing success of night racing at Canterbury Park Racecourse to confirm future demand. This has enabled the proponent to amend its intended night racing events capacity to exclude signature events, which alleviates traffic and transport impacts.

The delay to the project benefits from significant progress in lighting technology for sporting venues. This has allowed for improved lighting quality, better positioning of light poles and luminaire design that limits light spill. This has provided the proponent confidence that all prior lighting impacts on surrounding land uses can be fully mitigated and managed, and provide a far superior outcome than what was possible in 2017.

Based on this extended refinement of the scheme and a more considered design approach to mitigating environmental impacts, the proponent has demonstrated a genuine effort to deliver a proposal that is industry leading best practice, and of highest quality, with appropriate mitigation measures proposed.

## 1.4.5. Related Development

### 1.4.5.1. Spectator Precinct

On 7 February 2011 the Planning Assessment Commission (PAC) on behalf of the Minister for Planning, approved Major Project (MP10\_0097) application for the redevelopment of the Spectator Precinct at RRR.

The redevelopment of the Spectator Precinct approved under MP10\_0097 included:

- Substantial alterations and additions to the existing Queen Elizabeth (Q) II stand.
- Demolition and rebuild of the Paddock stand.
- Construction of a new “link building” structure between the QEII and Paddock stands.
- Construction of a new parade ring to the rear of the QEII and Paddock stands with associated amphitheatre style seating to establish a “Theatre of Horse”.
- Construction of a three storey Owner’s and Trainers Pavilion building adjacent to the parade ring.
- Construction of a new amenities building.
- Adaptive reuse of the existing Swab Building to accommodate a racing museum and members sign up area including a conference facility for a maximum of 100 people and a café facility.
- Demolition of the existing Randwick Pavilion and Tea House buildings.
- Demolition of the existing escalator structures to the rear of the grandstands.
- Associated services infrastructure upgrades, civil and landscape works.

MP10\_0097 was subject to two modifications summarised as follows:

- **MOD 1** – comprising modifications to the design of the grandstand, “Theatre of the Horse” parade ring, and other changes to site layout and structures. MP10\_0097 MOD 1 was approved by PAC on 25 February 2012.
- **MOD 2** – comprising an extension of the site boundary, approve the use of land and buildings within the Spectator Precinct for non-race day minor events up to 5,000 patrons, and other minor modifications. MP10\_0097 MOD 2 was approved under delegated authority on 3 March 2014.

Construction of the Spectator Precinct redevelopment was completed in 2013.

Figure 2 Royal Randwick Queen Elizabeth II Grandstand



Source: ATC

#### 1.4.5.2. Non-race day events

RRR is used for a wide range of non-race events, including hosting university exams, corporate events and music festivals. It is noted that specific development consents are held for these non-race day events, including:

- Minor Events (up to 5,000 patrons) to be conducted in accordance with conditions of consent MP10\_0097 MOD 2 except for development that is exempt under Randwick Local Environmental Plan 2012.
- Two Day Music Festival (10 year consent to 2024) – to be conducted in accordance with the conditions as outlined in the consent to SSD 6134-2013 dated 5th March 2014.

### 1.4.5.3. Multi-deck car park

A multi-deck car park exists at the western edge of the Spectator Precinct as identified below in Figure 3.

The multi-deck car park was approved and constructed as part of the CBD and South East Light Rail (CSELR) project in accordance with Condition B40 of SSI-6042 approval (discussed in **Section 1.4.5.5** below). Condition B40 of SSI-6042 stated:

#### Replacement of Australian Turf Club Buildings and Structures

*B40. Any buildings, structures or parking facilities within the Royal Randwick Racecourse site that will be demolished as part of the SSI, or as a result of compliance with condition B36, shall be replaced, in consultation with the Australian Turf Club and in accordance with condition B41 with all costs borne by the Applicant. Replacement buildings, structures or parking facilities must be replaced prior to the existing facilities being demolished, unless otherwise agreed by the Secretary.*

As such, due to the CSELR Randwick stabling facilities resulting in the demolition of the on-site overflow car parking, a new multi-deck car park was designed and approved by delegated authority on 18 August 2016 and constructed in 2017.

Figure 3 Location of multi-deck car park



Source: Near Map

The multi-deck car park caters for 574 vehicles and is accessed via the Ascot Street entrance. The multi-deck car park is supported by existing car parking on site with capacity for 3,500 vehicles in the infield car park, accessed from High Street.

#### 1.4.5.4. Winx Stand

The Minister for Planning approved SSD 10285 on 13 July 2020 for the development of a two-storey, multi-purpose facility called the Winx Stand.

The Winx Stand currently under construction, will transform the previously underutilised Leger Lawn located to the south-west of the QEII Grandstand. The new facility will provide increased weather protection and significantly enhanced amenity for general admission patrons on race days with new food and beverage facilities, as well as an outdoor terrace and balcony space on the second storey.

The Winx Stand has a maximum internal capacity of up to 7,500 patrons on race days. It also features a flexible design to accommodate alternative non-race day events and functions of up to 5,000 patrons.

The development of the Winx Stand includes the embellishment of the existing service access road between Leger Lawn and the multi-deck car park to create 'The Laneway', as well as a new link bridge connecting the Winx Stand to the QEII Grandstand.

Figure 4 Photomontage of Winx Stand (currently under construction)



Source: COX Architecture

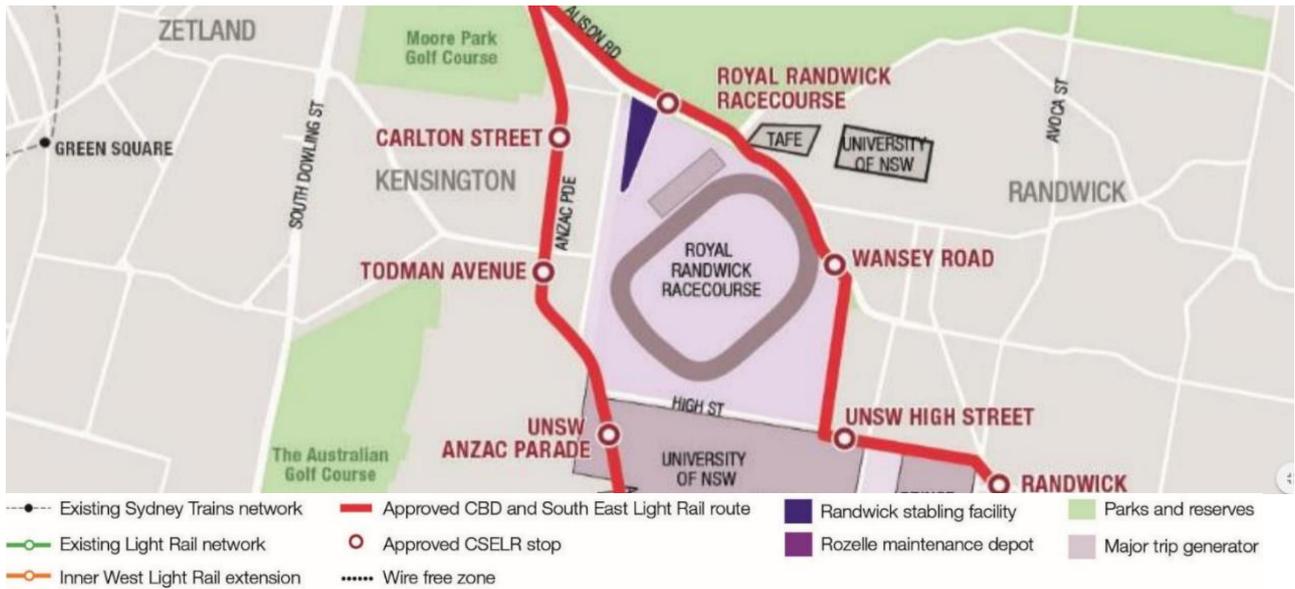
#### 1.4.5.5. CBD and South East Light Rail Project Approval

A separate but related project approval relates to the CBD and South East Light Rail (CSELR) project which is located partly within and directly adjacent to the subject site. The CSELR, now referred to as the Sydney Light Rail – Randwick line and Kingsford line, has been operational since completion of construction by Transport for New South Wales (TfNSW) in 2020.

Infrastructure Approval SSI-6042 was issued in June 2014 for the construction and operation of a light rail service generally from Circular Quay to Kingsford and Randwick via Surry Hills and Moore Park including 19 light rail stops, interchanges at ferry, rail and bus stations along the route. SSI-6042 has been subject to several modifications, with the most recent modification approved on 21 February 2017.

The relevance of the approval and construction of the CSLER is the creation of the new Royal Randwick light rail stop. This stop was originally approved to be located directly outside the main entrance to the racecourse Spectator Precinct. However, the location of the Royal Randwick light rail stop was relocated to the northern side of Alison Road, opposite the entrance to the racecourse, as part of Modification 4 to SSI-6042 which was approved in April 2016. The *Royal Randwick* light rail stop is fully constructed and operational.

Figure 5 Overview of approved light rail infrastructure surrounding Royal Randwick Racecourse

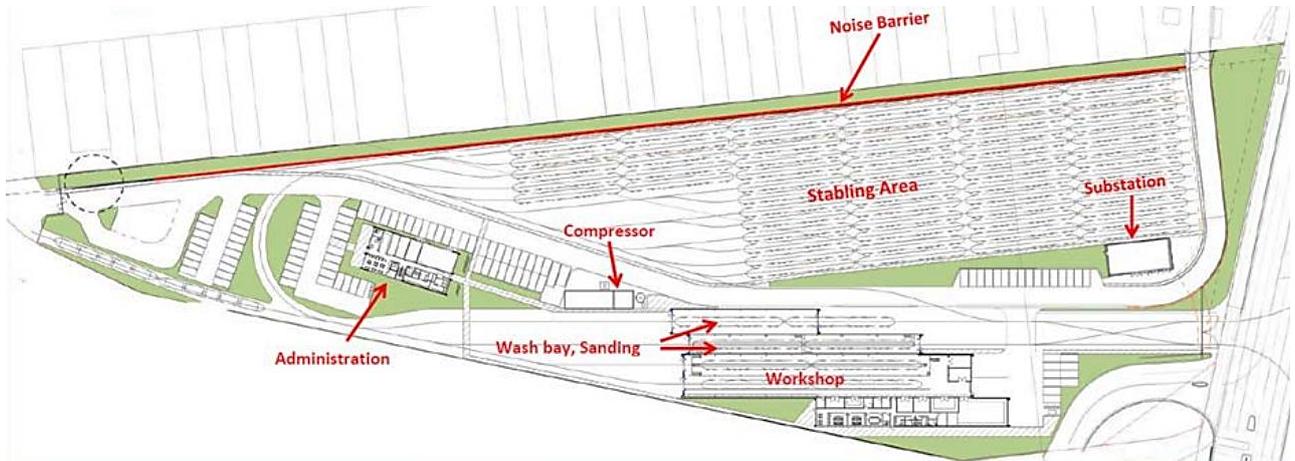


Source: Parsons Brinckerhoff, EIS MOD 4, November 2015

The CBD and South East Light Rail SSI-6042 approval also comprised the creation of a new light rail stabling facility located on the north-western corner of the Spectator Precinct of Royal Randwick Racecourse, accessed from Alison Road. The Randwick stabling facility provides accommodation for up to 32 Light Rail Vehicles (LRV's) stables in 13 separate tracks.

The stabling facility contains a turning loop and a siding located adjacent to the boundary of the racecourse. The boundary between the stabling facility and the racecourse is appropriately fenced to restrict access.

Figure 6 Randwick stabling facility layout



Source: Parsons Brinckerhoff, EIS MOD 4, November 2015

## 2. STRATEGIC CONTEXT

### 2.1. PROJECT AREA

#### 2.1.1. Site description

The site is legally described as Lot 2009 in Deposited Plan 1169042 and is Crown Land, leased to the ATC who own and operate the racecourse. The proposed application will relate to the full extent of the Racetrack, and the Spectator Precinct 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 majority of the site is very flat, especially around the central racetrack, the spectator precinct and facility areas on the 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.

Figure 7 Site Plan



Source: Urbis

Figure 8 Royal Randwick Racecourse



Picture 1 Spectator Precinct



Picture 2 Racetrack main straight

Figure 9 Current spectator precinct layout



Source: ATC

## 2.1.2. Access and parking

The site accommodates multiple access points which will be available for night racing events, summarised as follows:

- **Gate 1, Alison Road:** Gate 1 is the primary access point into RRR. 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. This Gate is the current primary entrance/exit point for pedestrians moving between RRR and the 'Royal Randwick' Light Rail station 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 RRR. This parking area accommodates approximately 3,500 spaces.
- **Gate 18, Ascot Street:** Gate 18 may be accessed via the roundabout intersection between Ascot Street and Doncaster Avenue, located towards the western side of RRR. 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.

## 2.1.3. External road network

The key corridors within the south-eastern subregion include Anzac Parade to the west 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.

The site is also bound by a local road network comprising Wansey Road to the east, High Street on the southern boundary of RRR, and Doncaster Avenue/Ascot Street to the west. 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.

## 2.1.4. Pedestrian and cycle network

The immediate locality of RRR 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. As such, walking trips between RRR and the local residential precinct or nearby public transport facilities is readily achievable.

Once patrons have entered through the main access gates to RRR, access to the Spectator Precinct is available via pedestrian Gates A, B, C, D, F, and the pedestrian tunnel to the Infield Car Park, as identified in **Figure 9** on the previous page.

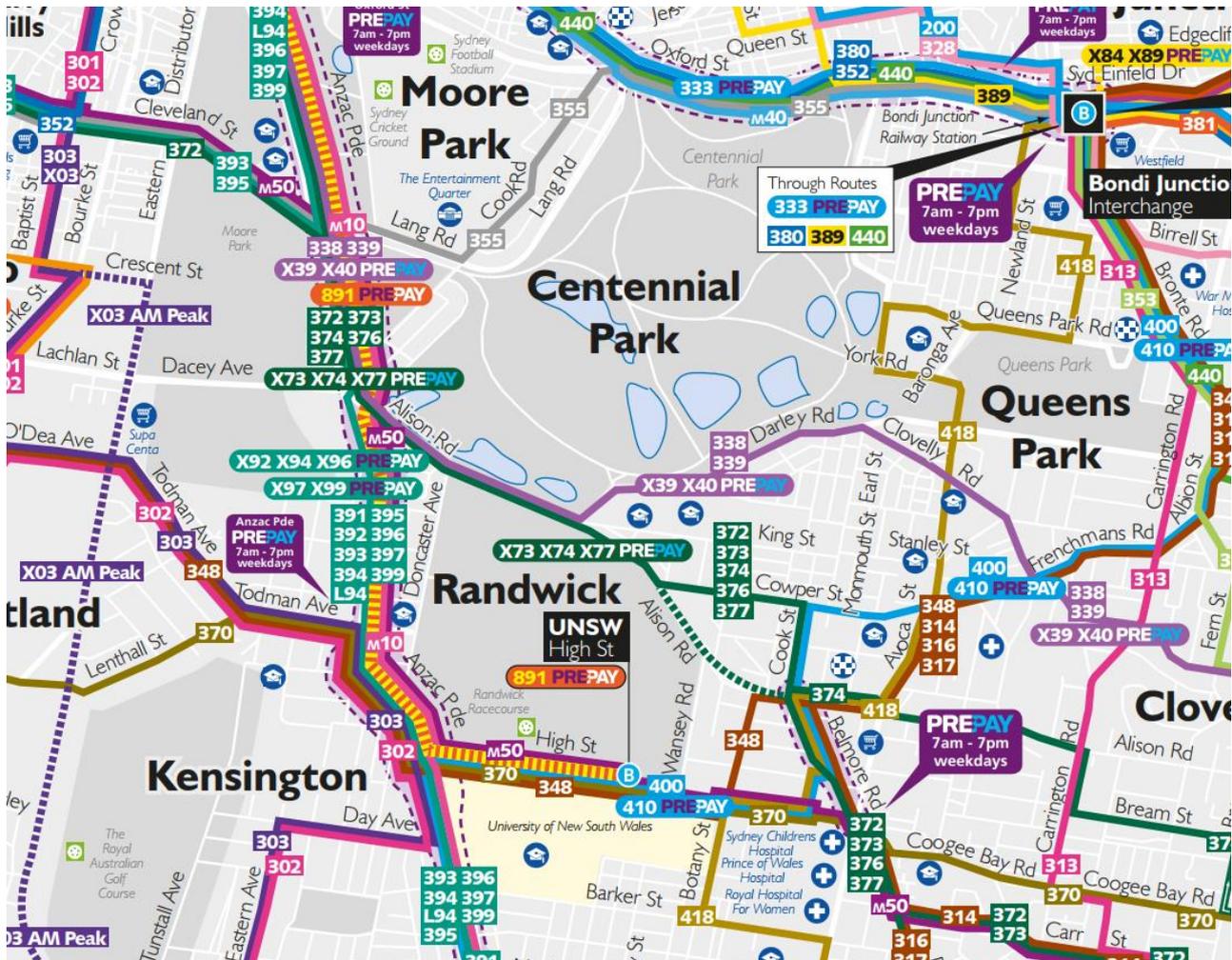
A number of existing off-road cycle routes are also provided in the area, including along Anzac Parade, Alison Road, Wansey Road, Doncaster Avenue, and Darley Road, many of which have been upgraded as part of the CSELR works package. These routes provide connectivity to the Randwick greater cycling network,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

It is understood that RCC is currently engaging with the community in regard to the future of cycling in Randwick.

## 2.1.5. Existing public transport

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. 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 Racecourse and Central Station.

Figure 10 Current bus service



Source: TfNSW

Through the Moore Park Event Operations Group (MEOG), ATC and State Transit Authority (STA) are able to plan additional special event bus services. These services provide direct connections from RRR to Central and Bondi, the details of which are outlined in Table 2.

Table 2 Additional bus services during night racing events

Route	Bus Capacity	Maximum Crowd (night races)	Bus / Crowd Ratio	Additional Buses	Additional Capacity (People)
Racecourse – Central	65	15,000	1 per 1000	15	975
Racecourse – Bondi	65	15,000	1 per 1000	5	325
<b>Total</b>				<b>20</b>	<b>1,300</b>

## 2.1.6. Sydney Light Rail

The Sydney Light Rail (Randwick and Kensington lines) was constructed by Transport for NSW (TfNSW) and systematically opened in December 2019 to April 2020. The light rail project provides a high frequency light rail service connecting key locations within the Sydney CBD, and landmarks including Moore Park, RRR, University of New South Wales, Kingsford, and Randwick.

The site is serviced by two new light rail stations, named Royal Randwick (located on Alison Road opposite the entrance to the Spectator Precinct), and the Wansey Road station located on Wansey Road near the intersection with Alison Road. Two stops (Carlton Street and Todman Avenue) are located on Anzac Parade, both also in comfortable walking distance to the racecourse.

The L2 service predominantly services the Racecourse and offers high frequency services (8-10 minutes) in both directions between 7am-7pm. Each light-rail vehicle is capable of transporting up to 450 patrons, leading to an hourly capacity of approximately 2,700 to 3,375 patrons in each direction under standard operation.

Through consultation with Sydney Light Rail, it is noted that during events at RRR, additional light rail services may be arranged, meeting frequencies of up to every two minutes. This would amount to a total capacity of 13,500 persons, or an additional capacity of 10,125 patrons in each direction.

Figure 11 Extract of the CSELR route



Source: TfNSW

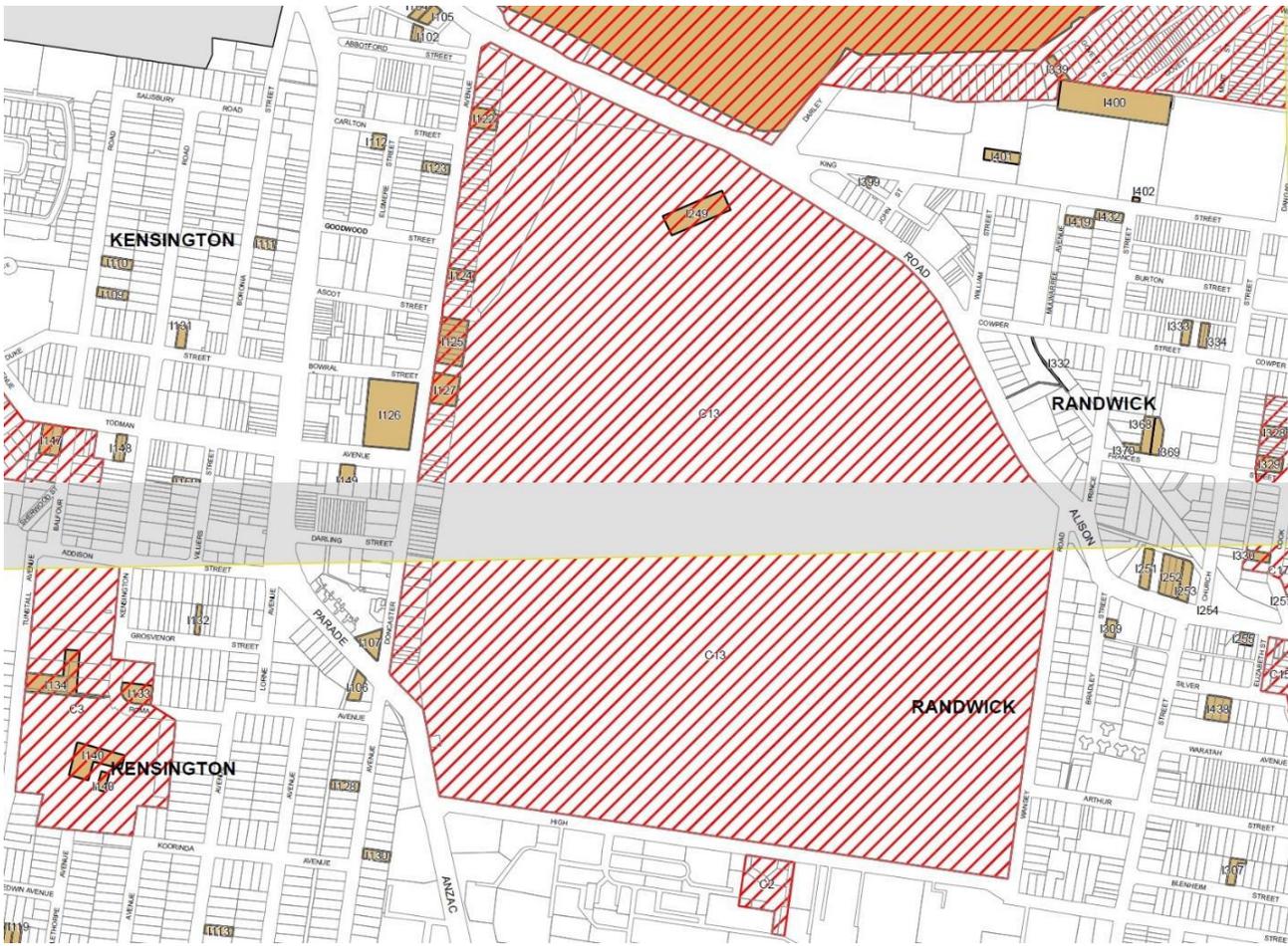
## 2.1.7. Heritage

The site is identified as containing heritage items and being a heritage conservation area under the *Randwick Local Environmental Plan 2012* (Randwick LEP 2012). All items and areas of heritage significance are listed in **Table 3** below.

Table 3 Heritage listing

Item No.	Item Name	Address	Significance
<u>Heritage Conservation Area</u>			
C13	Racecourse	Royal Randwick	Local
<u>Heritage Items</u>			
I249	Members' Stand Official Stand, Royal Randwick	77-97 Alison Road	Local

Figure 12 Randwick LEP 2012 heritage map



Source: Randwick Council Local Environmental Plan 2012, Heritage Map HER\_002

## 2.2. PROJECT CONTEXT

Royal Randwick Racecourse is one of the largest recreation areas in the highly urbanised Eastern Suburbs of Sydney. It is located within a major open space, recreation and entertainment precinct that includes a range of passive and active recreation areas and sporting facilities, including Moore Park Golf Course, the Moore Park Sport Precinct (including Sydney Cricket Ground and Allianz Stadium), the Entertainment Quarter and Centennial Park.

The site is strategically significant due to its proximity to a number of key Sydney features including:

- Coogee Beach – 3km
- Bondi Beach – 5km
- Sydney Airport – 6km
- Sydney CBD – 6km
- UNSW and Prince of Wales Hospital – immediately adjacent

The site is directly serviced by the Sydney Light Rail, with light rail stops on Alison Road and Anzac Parade within short walking distance. The completion of the Sydney 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 site is located in the Randwick City Council (RCC) Local Government Area (LGA) and positioned between two key sub-regional road corridors, being Anzac Parade and Alison Road. Anzac Parade is subject to transform into a more vibrant and active precinct in the future, based upon the strategic planning for the Kensington and Kingsford Town Centres Strategy and planning proposal undertaken by RCC. This transformation is set to attract a new community centred around convenience and lifestyle.

RRR interfaces 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, approximately 1.5km away.
- South – the University of NSW is located along the entire southern boundary of the site fronting High Street.
- South east – 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, subject to potential uplift as part of the Kensington and Kingsford Town Centre Master Plan.

## 2.3. STRATEGIC FRAMEWORK

Identification of the strategic policies that establish the context for the site are outlined in the following policies and documents:

- Premier's Priorities;
- Greater Sydney Region Plan 2018;
- Eastern City District Plan 2018;
- Randwick Local Strategic Planning Statement 2020;
- Future Transport Strategy 2056; and
- Visitor Economy Industry Action Plan 2030.

An assessment of the proposed development against these policies demonstrates that there is significant strategic support for the project.

### 2.3.1. Premier's Priorities

In June 2019, the NSW State Priorities were replaced with 14 Premier's Priorities, which represent the NSW Government's commitment to strengthen and improve NSW. The proposed development achieves the following relevant objectives of the Premier's Priorities:

#### ***"Greener public spaces***

*Increase the proportion of homes in urban areas within 10 minutes' walk of quality green, open and public space by 10 per cent by 2023."*

The establishment of night racing at RRR is set to reinforce the racecourse as the pinnacle venue of racing in NSW.

This will strengthen NSW's identity on both the national and international stage, promoting investment and participation in the racing from overseas, which will boost the NSW economy. The establishment of night racing will create significant multiplier benefits including:

- Increased employment at RRR.
- Increased night economy activity, through attracting more patrons to the local area in the evening.
- Increased domestic and international tourism for Sydney.
- Increased choice within the Sydney night economy.

At the local economy level, the introduction of night racing will also provide new and increased opportunities to local restaurants and businesses along Anzac Parade, in turn boosting the local night time economy.

### 2.3.2. Greater Sydney Region Plan 2018

In March 2018, the Greater Sydney Commission released *Greater Sydney Region Plan: A Metropolis of Three Cities*, the regional plan for the Greater Sydney area. The plan sets a 40-year vision and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of economic, social and environmental matters.

The key aim of the plan is to deliver a metropolis of three 30-minute cities, including the Western Parkland City, Central River City and the Eastern Harbour City. The site is located within the Eastern Harbour City (refer **Figure 13**), which is projected to have a population of 3.3 million people by 2036. The general approach of the Eastern Harbour City is to build on its recognised economic strength through focusing on innovation and global competitiveness, and address liveability and sustainability.

This strategic document is guided by 10 overarching directions and 40 strategic objectives, which are supported by key metrics to measure the progress of the objectives. The NSW Government has identified that 725,000 additional homes and 817,000 additional jobs will be needed between 2016 and 2036.

RRR directly employs approximately 100 permanent employees and fluctuates approximately 1,500 temporary staff, across a variety of business, commercial and industrial sectors related to horse racing, and creates many more indirect jobs. It is envisaged that the introduction of night racing at RRR will continue to attract new interest in horse racing, and ensure that horse racing and associated jobs remain at RRR for the foreseeable future.

The proposed night racing at RRR aligns directly with the vision of the Greater Sydney region as a “*city for people... with great places that keep bring people together*”, established within the liveability directions of the plan. The proposal aligns with the following objectives of the plan.

- **“Objective 4 – Infrastructure use is optimised**

*New developments are to be contiguous with existing developments so that existing demand management initiatives can be leveraged”*

The proposed development maximises the utility of the existing and planned infrastructure in the south-eastern CBD. By co-locating a new tourist and cultural event within an established health and education super-precinct, demand for additional infrastructure will be reduced and tourists and visitors will utilise transport infrastructure which is currently being delivered to service the Randwick health and education precinct. This represents both an efficient and economic use of Sydney’s infrastructure networks.

- **“Objective 9 – Greater Sydney celebrates the arts and supports creative industries and innovation**

*Creative industries have a growing role in the region’s productivity, with creativity, entrepreneurship, technical ability and collaboration being essential skills for the future workforce”*

Creating opportunities to expand Sydney’s artistic and cultural framework is essential to create a city where local residents want to live and international investment flows. Greater resident participation strengthens community networks, engages the local community and builds upon Sydney’s international identity. The proposed night racing events will contribute to Sydney’s vibrant and safe night-time economy and will draw international attention, enhancing Greater Sydney’s standing as a global city and boosting the Randwick local economy.

- **“Objective 22 – Investment and business activity in centres**

*Create opportunities to attract investment, business activity and jobs in centres across Greater Sydney”*

Randwick is identified as a Strategic Centre in the Greater Sydney Regional Plan, due to the co-location of a wide mix of land uses which provides jobs and services at a range of scales. Unlocking the economic potential of the Randwick Strategic Centre will be achieved through significant private sector investment and prioritising development opportunities. The development proposal will achieve this direction due to the significant economic expenditure at each night event, in addition to the flow on expenditure within the surrounding Strategic Centre.

- **“Objective 24 – Economic sectors are targeted for success**

*Visitors’ experiences are shaped by major attractions and events and equally by the places they visit, the facilities available and how their needs are met”*

Greater Sydney is Australia’s premier tourist attraction, welcoming 3.75 million international visitors per year (prior to the Covid pandemic and current restrictions on international travel). Encouraging the development of tourist attractions and well-designed and located facilities will significantly boost the strong tourism industry within Greater Sydney, aligning directly with the proposal to host an internationally recognised racing event within an established tourism precinct serviced by modern transport infrastructure. The proposal represents an appropriate growth of alternative night-time activities in Sydney.

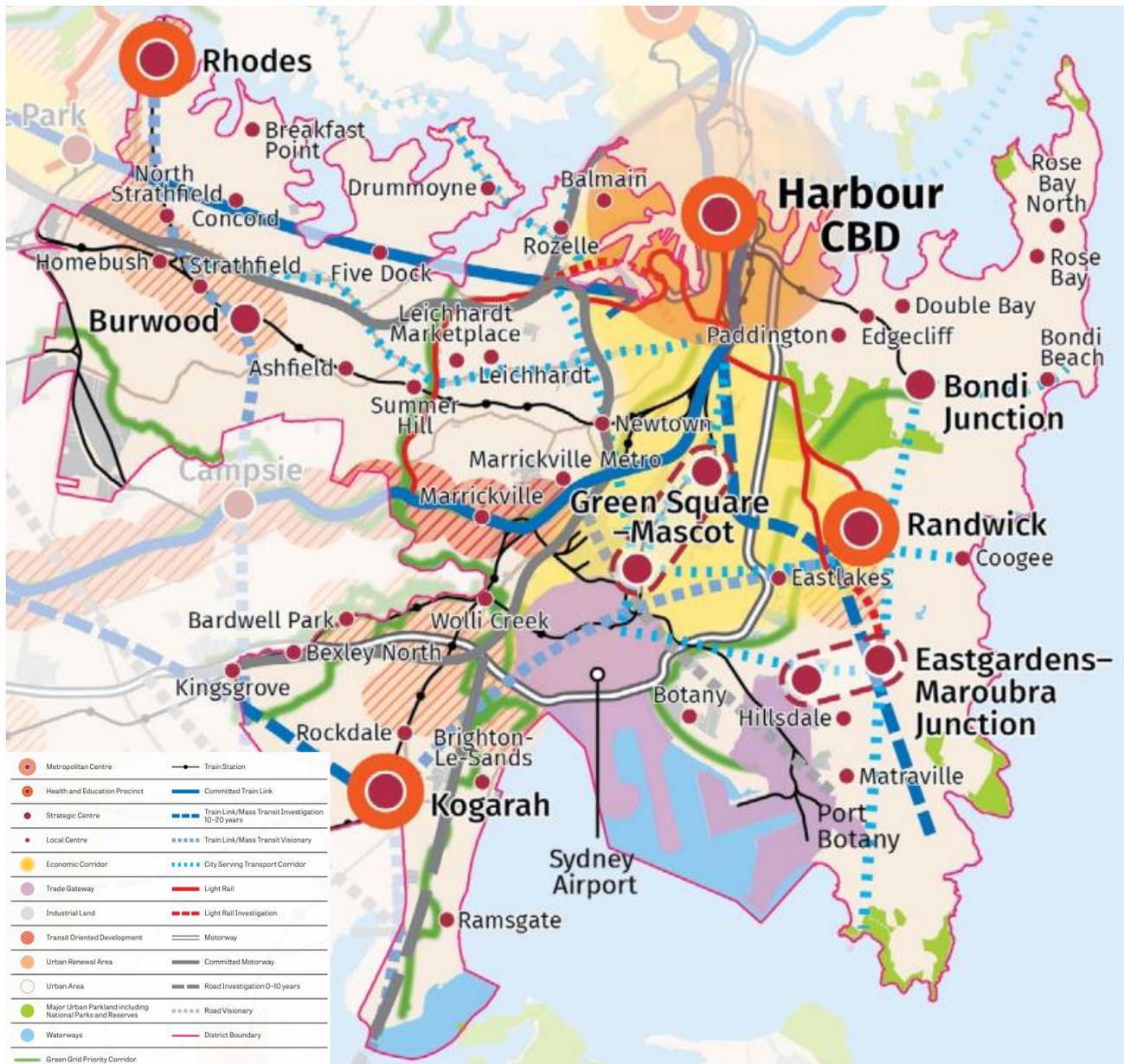
The proposed development represents an economic, social and strategic opportunity to realise the Greater Sydney vision for 2056.

### 2.3.3. Eastern City District Plan 2018

The site is located within the Eastern City District, which includes the local government areas of Bayside, Burwood, Canada Bay, Inner West, Randwick, Strathfield, the City of Sydney, Waverley and Woollahra.

The *Eastern City District Plan* was released by the Greater Sydney Commission in March 2018 and represents a guide for implementing the *Greater Sydney Region Plan* at a District level over the next 20 years. The Plan guides the growth of the Eastern City District by elevating the role of the traditional CBD to a Harbour CBD, with policy settings to support innovative and creative industries, and a night-time economy. The Eastern City District is expected to increase in population size to 1.34 million people by 2036.

Figure 13 Eastern City Structure Plan



Source: Greater Sydney Commission

The site is located within the Randwick Strategic Centre, which provides important services, jobs and places for people to meet. The vitality of the centre is important to the local and broader economy, and helps to define the character of the local area. The growth of the centre will primarily be guided through the collaboration of health, education and services, supported by the NSW Government's investment in the CBD and South East Light Rail. Capitalising on the transit connection will achieve the 2036 employment targets of 35,500 – an increase of 12,700 over a 20-year period – through greater connectivity and creation of complementary employment opportunities.

RRR is also identified as a major contributor to the open space and recreation facilities within the District. It provides sport and cultural activities, as well as unique employment in the equine and event industries.

The Randwick Collaboration Area presents an opportunity to deliver significant economic benefits through the agglomeration of health, research and education services. Collaboration will include a focus on:

- activating High Street; supporting a vibrant and modern community; improving transport, walking and cycling connections across the precinct; and integrating key surrounding centres and facilities including the Royal Randwick Racecourse.

Planning priorities outlined in the plan to guide the growth of the Randwick Strategic Centre and Collaboration Area that align with the proposed night racing at RRR are as follows:

- **“Planning Priority E5 – Provide housing supply, choice and affordability with access to jobs, services and public transport.**

*Priority Precinct – Anzac Parade Corridor”*

The Anzac Parade Corridor is identified as an important opportunity to deliver essential community infrastructure to support the residential growth of the District. The identification of the Anzac Corridor as a Priority Precinct indicates substantial economic investment will be dedicated to this area over the next 20 years. The ongoing renewal and development of this area must be supported by a range of land uses, during both the day and night-time, in order to create a liveable, vibrant and viable precinct. The proposed night racing events will positively contribute to the night-time activities within the District and support the growth of the Anzac Parade Corridor Priority Precinct, by diversifying the cultural offer within the precinct.

- **“Planning Priority E8 – Growing and investing in health and education precincts and the Innovation Corridor.**

*Competitive innovation precincts depend upon high levels of amenity... and a range of cultural, entertainment and leisure activities, including strong night-time activities”*

The growth of the Randwick Collaboration Area as a major health and education precinct will increase the economic productivity of the District substantially. Integrating the growth of the Collaboration Area with venues and facilities such as RRR is identified as a key action within the Plan, as it will support surrounding population growth. The proposed night racing will be a significant economic benefit for the Collaboration Area and will support the range of land uses outlined within the plan.

- **“Planning Priority E13 – Supporting growth of targeted industry sectors.**

*While the District’s tourism economy is mature, it can grow by tapping into the breadth of assets in the District”*

The Eastern City District has an established visitor and tourism industry, which contributed \$15.4 billion to the national economy in 2014-2015. Due to the constrained nature of land within the district and growing pressures for conversion of sensitive land uses, it is imperative to optimise the infrastructure of existing tourism districts, such as RRR, to allow for the ongoing economic and strategic growth of the District. The introduction of night racing at RRR will promote the long-standing racing activities at RRR which are a key historical tourism attraction to the District, while better utilising this major sporting venue for events within the District.

- **“Planning Priority E18 – Delivery high quality open space.**

*In giving effect to A Metropolis of Three Cities, this Planning Priority delivers on Objective 31: Public open space is accessible, protected and enhanced, and the corresponding strategy and action.”*

Royal Randwick is a major sports and recreation facility within the District. The introduction of night racing events will improve accessibility of government’s investment in major transport infrastructure and better utilisation of RRR, providing an event calendar with national and international interest, and increasing choice for race-goers.

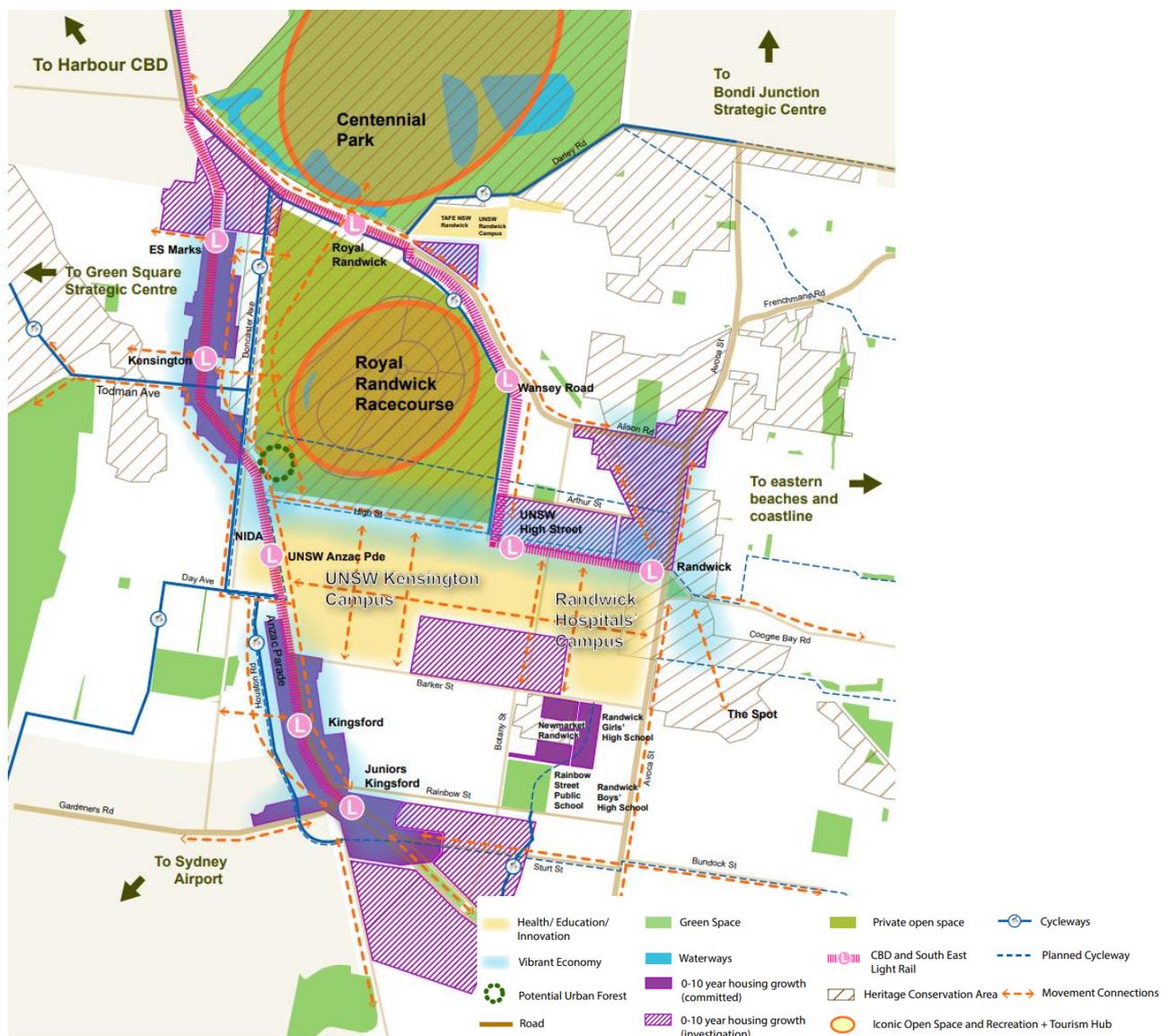
## 2.3.4. Randwick Local Strategic Planning Statement 2020

Randwick's *Vision 2040: Local Strategic Planning Statement* (Randwick LSPS) is a 20-year vision and framework to guide land use planning and decision making for the future of Randwick. The Randwick LSPS was placed on public exhibition from October 2019 to November 2019 and was endorsed by the Greater Sydney Commission in March 2020.

The Randwick LSPS identifies RRR as being part of the Randwick Collaboration Area (refer **Figure 14**) and states:

- “the Royal Randwick Racecourse generates demand for short term accommodation for its major events such as the Spring Carnival”. It also recognises the importance of RRR for shared use, such as providing spaces for UNSW examinations and that RRR continues to be an important venue for events in the area.
- An identified opportunity for growing and strengthening the Collaboration Area is “supporting the ongoing operation and growth of the Royal Randwick Racecourse as an iconic cultural and recreational landmark”.
- “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”.

Figure 14 Randwick Collaboration Area Structure Plan



The Randwick LSPS contains a number of key directions and planning priorities to achieve four key themes: liveability; productivity; sustainability; and infrastructure and collaboration. The proposed night racing at RRR achieves the following actions which in turn support the key directions of the plan:

- **Planning Priority 9: Focus economic development, innovation and jobs growth in strategic centres** – RRR directly employs approximately 100 permanent employees and fluctuates around 1,500 temporary staff, across a variety of business, commercial and industrial sectors related to horse racing, and creates many more indirect jobs. It is envisaged that the introduction of night racing at RRR will continue to attract new interest in horse racing and ensure that horse racing remains at RRR for the foreseeable future. Night racing events are anticipated to create more employment opportunities in hospitality and retail on site and the surrounding area. In addition, night racing will create activity in the area, meaning an increased opportunity for retail and particularly restaurants in the locality.
- **Planning Priority 12: Manage and enhance the tourism and visitor economy** – The proposed introduction of night racing at RRR 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 as we emerge from Covid19. As such, this proposal is consistent with initiatives identified within the *Randwick Economic Development Strategy*.
- **Planning Priority 14: Provide high quality open space and recreational facilities** – RRR is identified as a local heritage item within the Randwick LEP 2012. RRR has existed for over 150 years on the site and is recognised as a key feature within the LGA, and regionally. The establishment of night racing at RRR will reinforce it as an internationally recognised venue for years to come.
- **Planning Priority 18: Reduce the consumption of energy and waste** – the proposed lighting is of modern design, utilising LED technology to greater energy efficiency. Track lighting usage will also be limited to certain times and only for night racing events. Details of environmentally sustainable design measures to be implemented in the night racing proposal are included in **Section 6.7** of this EIS report.
- **Planning Priority 21: Develop an integrated approach to more sustainable transport** – The Sydney Light Rail was completed in 2020 and provides new light rail stations opposite the main entrance to the Racecourse, on Alison Road and Anzac Parade. The Sydney Light Rail provides high frequency connections between Randwick and the Sydney CBD via Central, and is being promoted as the most attractive transport option on race days. The proponent has implemented existing transport management plans which promote sustainable transport options and has successfully operated for racing events currently held at RRR. Notably, RRR has worked with NSW transport operators to integrate public transport into all race day ticketing, and this will also be applied to night racing tickets.
- **Planning Priority 23: A collaborative approach to guide and manage future growth in Randwick City** – 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. Community consultation undertaken as part of the preparation of this SSDA and the Community Consultation Strategy for ongoing consultation is discussed in detail in **Section** Error! Reference source not found. of this EIS report.

### 2.3.5. Future Transport Strategy 2056

The Future Transport Strategy 2056 (Transport Strategy) was released by the NSW Government in March 2018. The Transport Strategy sets the 40-year vision, directions and outcomes framework for transport mobility in NSW, to guide long-term transport investment and aims to respond to the significant contemporary changes affecting transport and customer mobility in Sydney.

The Transport Strategy responds to the rapid technological advancements in the transport industry, including the increasing automation of public transport networks, data sharing, mobile integration of services and the rise of ridesharing in NSW. The Transport Strategy aims to preserve optionality for future users and travel behaviours, and repurpose existing infrastructure and corridors to optimise their performance and maximise carrying capacity. These services include the Sydney Light Rail, which now supports improved public transport and congestion management within the Eastern Harbour City, and provides direct access to RRR.

The proposed night racing events at RRR will be supported by the improved public transport infrastructure provided by Sydney Light Rail. Sydney Light Rail is a valuable transport option for patrons attending the proposed night racing events and reduces the need for reliance on private vehicles and bus services from Central. The Proponent will maintain ongoing consultation with Transport for NSW to manage the travel

demands to and from RRR for racing events through existing working groups. This is addressed further in the Transport Impact Assessment prepared by PTC in **Appendix J**.

### **2.3.6. Visitor Economy Industry Action Plan 2030**

In 2012, the NSW Government released the *Visitor Economy Industry Action Plan (VEIAP)*, which provided strategies and actions to achieve the NSW Government's goal of doubling overnight visitor expenditure to \$36.6 billion by 2020. At that time, the visitor economy was growing at a rate of only 2.2% a year. In September 2017, the NSW Government commissioned a review of the VEIAP to validate its effectiveness, and subsequently released the VEIAP 2030 in August 2018.

Whilst the VEIAP 2012 identified that NSW destination appeal had fallen in recent years and was being outperformed by competitor destinations in Australia and the Asia-Pacific region, the revised VEIAP 2030 recognises the growing success of the industry, affirming that "we are on the right track" with a growth of 50.4% since March 2011. The VEIAP 2030 sets a new industry target for overnight visitor expenditure of \$55 billion by 2030. It provides 34 actions and six key focus areas for the NSW Government to work with the tourism industry and continue growing the NSW destination brand, by building upon existing tourism and event assets.

Night racing events at RRR are expected to attract tourists from target markets identified within the plan, including intrastate, interstate and international regions such as the Asia-Pacific (once we emerge from Covid). This will positively contributing to the domestic and international tourism industry of Sydney and NSW.

Whilst the tourism and events industry (particularly those relying on international visitors) is currently challenged by the global Covid pandemic, the proposed night racing is consistent with the vision for strengthening the NSW brand. Night racing at RRR will also contribute to the revival of tourism and the night time economy through the recovery from the Covid pandemic.

## 3. PROJECT DESCRIPTION

### 3.1. PROJECT SUMMARY

This application seeks approval for:

- Consent for 16 night racing events per annum (concentrated between October and April).
- Installation of new trackside lighting to facilitate televised broadcasting.
- Upgrade of the existing Spectator Precinct lighting for patron safety.
- Permanent diesel generators for electricity generation for trackside lighting.
- Staging of physical works.

An overview of the project summary is outlined in **Table 4** and discussed in the following subsections.

Table 4 Key aspects of the development

Project element	Summary of the project
Project Site Area	Approx. 80.5 hectares
Site Description	Lot 2009 in Deposited Plan 1169042
Built Form	Light columns
Number of night racing events per annum	16
Scheduled Event hours	6pm-10pm
Scheduled time of year	October to April (generally coincide with daylight savings)
Maximum number of patrons (at Class 2 events)	15,000
Number of track light columns	79
Height of light columns	Variable (between 18.3m – 40m)
Number of diesel generators	4

### 3.2. NIGHT RACING EVENTS

The proposal seeks consent for up to 16 night racing events per annum in the following format:

- Events are to be held predominantly in Spring to Autumn, between the months of October through to April and will generally coincide with Daylight Savings. The proponent seeks flexibility for some night racing events to be held during other months of the year if required. Refer to **Section 3.2.1**.
- Events may be held on a variation of Thursday, Friday, Saturday, or Public Holidays (where appropriate).
- Races are proposed to be scheduled between 6 – 10pm.

#### 3.2.1. Number of race meetings per annum

The proposal is for 16 night racing events per annum. These night racing events will not result in a net increase in the number of racing events held at RRR per year (currently approximately 45 publicly available

racers per year), as the proposed night racing would see a number of the existing day racing events converted to night racing events.

Night racing events would be held typically between October and April. Notwithstanding, it is noted that the Proponent is not responsible for race scheduling in NSW. The specific dates and total number of race events each year is selected by Racing NSW.

As such, the specific dates of night racing events will vary slightly each year to reflect public holidays, external event dates (to minimise local and international event clashes) and demand. In addition, Racing NSW may require scheduling of night racing events outside of the typical period. However, this would be by exception and case-by-case. The racing schedule will be clarified by Racing NSW upon approval and implementation of the project. It is proposed that subject to approval, a condition of consent provide scope to manage this flexibility in timeframes and number of events on a limited basis. It is recognised this matter will likely require resolution during Response to Submissions (RTS).

### 3.2.2. Hours of operation

The proposed race events are scheduled to be completed between 6pm and 10pm. Trackside lights will be turned off at 10pm and patrons will be required to leave the site.

On occasion there may be instances where there is a delay in race times due to the nature of horse racing. This may result in races scheduled to 10pm running overtime. This will be in exceptional circumstances for safety requirements in the case of a delay or injury at the end of the last scheduled race. In these instances, track lighting will be turned off no later than 10.30pm and the lighting has capability to dim parts of the track as required to minimise any impacts for these exceptional circumstances. Refer to **Section 3.3** for further information regarding lighting.

The 'bump-in and bump-out' operation will be undertaken in accordance with the Event Operational Management Plan (EOMP) in Error! Reference source not found. and will include waste management and cleaning of the site after the scheduled racing period of 6pm – 10pm. This is consistent with the 24 hour operation of RRR under existing approvals. Details of this 'bump-in and bump-out' operational hours are addressed in the EOMP.

### 3.2.3. Night racing patronage

ATC identifies that attendance at RRR daytime racing events range from 5,000 patrons for minor racing days, and 35,000+ for large (signature) carnival events.

As such, the ATC currently has special event classifications in place as detailed in the EOMP in **Appendix N**. As shown in **Table 5**, it is proposed that most night racing events (12 events per annum) will have attendance below 10,000 patrons. Four medium sized night racing events are proposed to have up to 15,000 patrons.

There are not any signature carnival events proposed for night racing and consent is not sought for night racing events greater than 15,000 patrons.

Table 5 Proposed classification of night racing event patronage

Event classification	Patronage estimate	RMS Classification*	Characteristics	Proposed night race events
Minor	Up to 10,000	Class 3	Minor race meets	12 events p/a**
Medium	10,001 – 15,000***	Class 2	Current race day events	4 events p/a
Large	35,000+	Class 1	Signature carnival race event ( <i>The Everest</i> )	0 event p/a
				Total night race events = 16 p/a

\*refer to RMS classification notes in Traffic Management Plan in **Appendix J and Appendix K**.

\*\*p/a = per annum

\*\*\*Class 2 day events are typically 35,000 pax but have been reduced for night racing events only.

### 3.2.4. Ancillary items

Proposed ancillary items such as music, entertainment and service of alcohol will be consistent with the operation of daytime race events under existing approvals and licences.

However, it is noted that some daytime race events host live entertainment in the “Theatre of Horses” at the end of the event. Due to time limitations and minimising impacts on surrounding residents, this proposal does not seek consent for live entertainment post-racing.

## 3.3. TRACKSIDE LIGHTING

The proposed trackside lighting comprises of two design elements, being the lighting structures (poles/columns) and the luminaires (light source).

### 3.3.1. Lighting structures

Integrated Group Services (IGS) has been commissioned as lighting specialists to design the trackside lighting to facilitate night racing at RRR. IGS was supported by an international multi-sport lighting company (Musco) to identify the most cutting edge and best practice sports lighting solution available. The proposal consists of installing a series of tall, narrow light columns and infrastructure to illuminate the track to adequate levels to meet criteria for televised broadcasting standards.

There is a total of 79 light columns each approximately 750dia, proposed around the track. Collectively, the light columns will house 1,912 lighting fixtures to provide the required illumination. A typical light column is shown in **Figure 15**.

The design consists of the following proposed configuration of light installations:

Table 6 Summary of proposed light installations

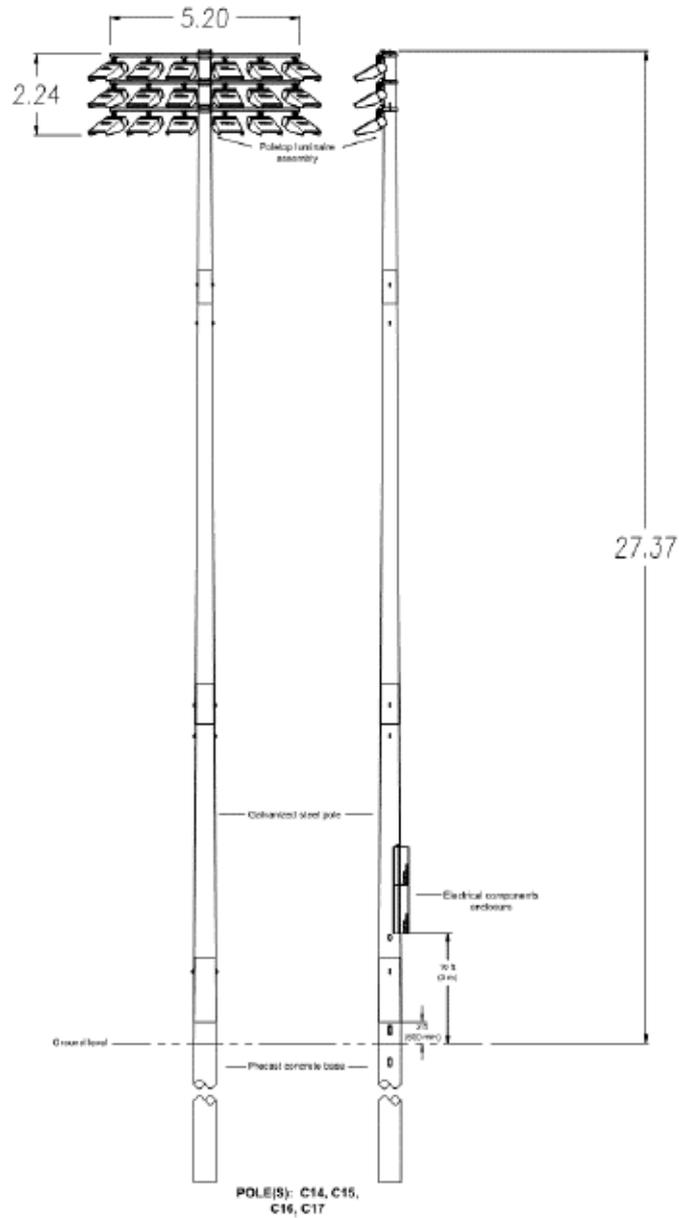
Proposed light column code	Light column height min (m)	Light column height max (m)	Proposed number of light columns
A	27.4	40	14
B	27.4	-	40
C	18.3	27.4	24
F*	24.4	-	4
M	30.5*	-	16**
			Total light installations = 79

The positioning of the light columns around the racetrack is critical to provide adequate lighting to illuminate the horses and jockeys to televised broadcast standards and so that horses are visible from the grandstand, without creating glare for the camera or patrons. Light column locations have also been carefully designed to allow for an unimpeded view of the home straight during racing and minimise the view of light columns on the back straight and bends.

It is necessary to switch the light column positions from the inside of the back straight and bends, to the outside of the home straight to provide adequate vertical illumination to horses and jockeys, as illustrated in **Figure 16, Figure 17 and Figure 18**, to ensure that they are sufficiently lit to be viewed from the Grandstand and broadcasting camera (also located within the Grandstand). The three (3) starting chutes require similar consideration.

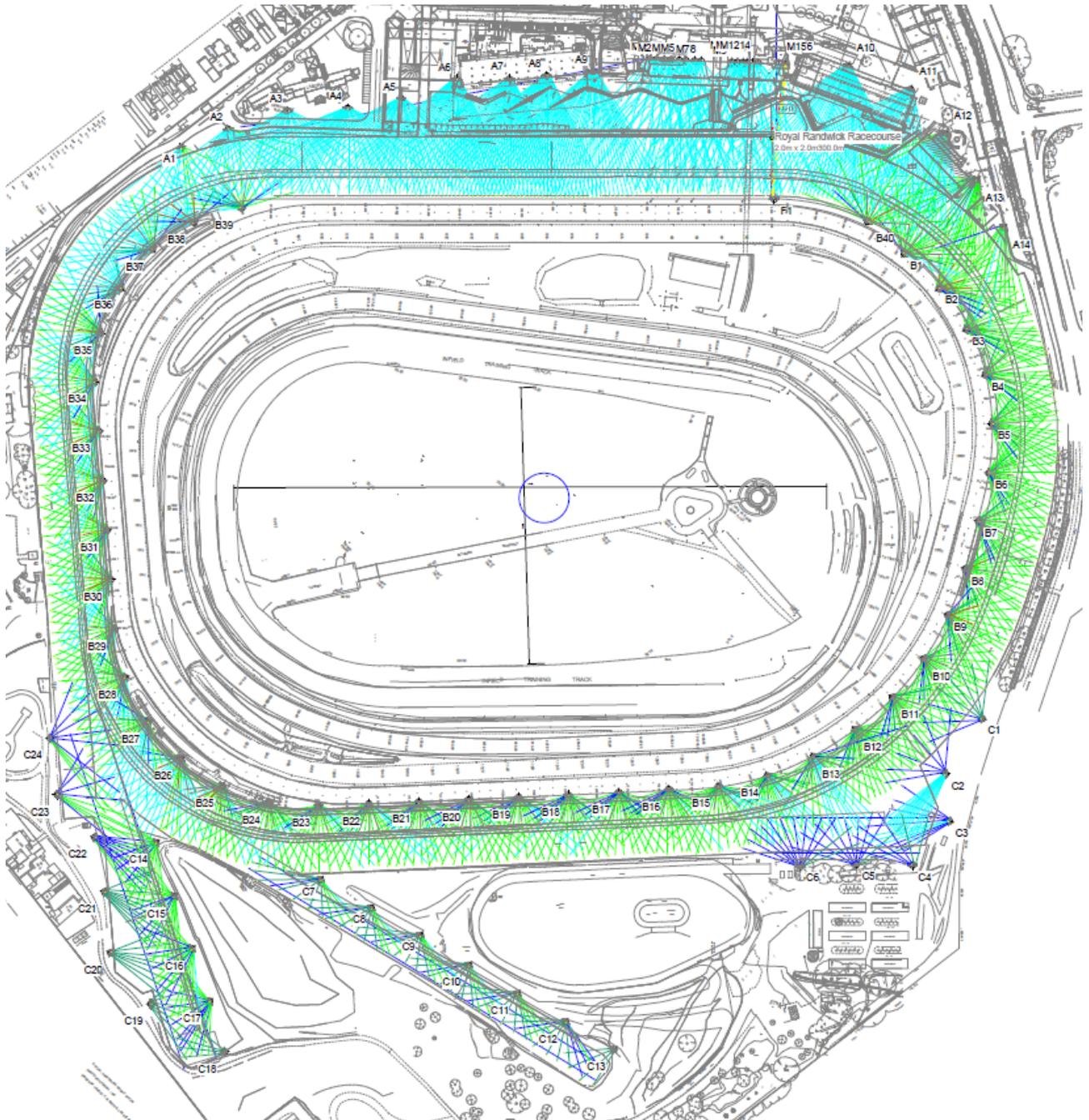
Further details of the lighting design and rationale are contained in the Lighting Impact Assessment prepared by Integrated Group Services (IGS) in **Appendix E**, and the Visual and Landscape Impact Report prepared by Sturt Noble in **Appendix I**.

Figure 15 Typical 27.4m pole



Source: IGS

Figure 16 Identification of light columns



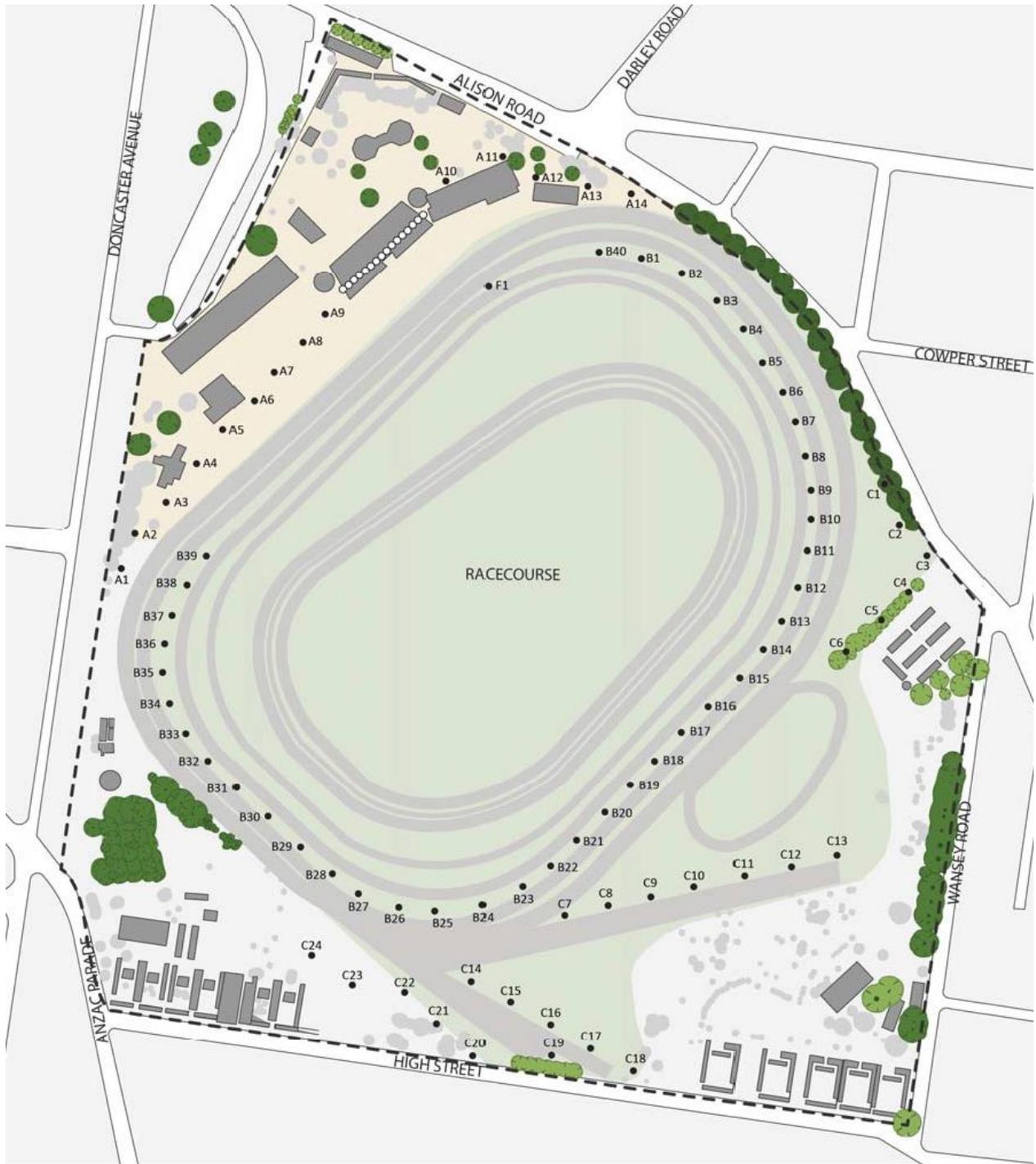
Source: IGS

Figure 17 Trackside lighting design – Heights of light columns



Source: SNA

Figure 18 Column numbering



- Site boundary
- Exceptional significant vegetation
- High significant vegetation
- Other vegetation
- Racecourse area
- Spectator area

- Light columns
- Luminaires connected to buildings
- Columns in close proximity to significant trees
- Columns in close proximity to existing structures
- Columns in close proximity to the approved Winx Stand



Other buildings

Source: SNA

### 3.3.2. Luminaire Lighting Design

Critical to the proposal is the televised broadcasting of the proposed night racing events. Integrated Group Services (IGS) have identified the relevant lighting design criteria to meet broadcaster's requirements. As such, the lighting design is proposed with the following requirements outlined in **Table 7**:

Table 7 Broadcaster's requirements to meet International Standard for colour TV venues

Vertical illuminance (Ev) towards Camera 1	Ev Illuminance toward main camera 1 from other directions	Colour temperature (K)	Colour Rendering (Ra)
1400 lux	1000 lux	5600	≥86

Table 8 Other minimum requirements

Glare Rating (GR)	Uniformity (U)	Calculation grid	Flicker Factor (FF)
50 for participants 40 for camera	Vertical 0.7 on the home straight, 0.6 elsewhere.  Horizontal 0.8	1.5 m above ground level	≤10% with camera speeds ≤600fps

The proposed luminaires will use light-emitting diodes (LED) as the light source (refer **Figure 19**). LED technology provides instant control, stepped illumination levels, energy efficiency, excellent colour rendering and long lamp life. These luminaires can be controlled with dimmable relay modules to accurately control the intensity of illumination.

Figure 19 Typical LED floodlighting luminaires



Source: IGS

The luminaires can be fitted with louvres, baffles or shields to assist with controlling light spill. However, these features are not proposed for the entirety of the light columns due to the effect on the performance of the luminaires. Care needs to be taken to ensure the light uniformity over the track is maintained as horses are very sensitive to variations in light levels.

The fitting of louvres, baffles or shields are implemented into the design as a mitigation measure where required, which is detailed in **Section 6.1** of this EIS, and within the Lighting Impact Assessment by IGS in **Appendix E**.

### 3.3.3. Variable Illumination Control

The proposed trackside lighting is designed with the ability to vary the light intensity so that the trackside lighting only requires to be illuminated to meet broadcast lighting criteria during televised races (refer to **Figure 20** for indication of variability).

As such, it is proposed that the racecourse lighting will be controlled in the following manner:

- Control shall be via PC based software, similar to Canterbury Racecourse, with dimmable relay modules located within each Main Switchboard (**MSB**).
- Lights shall be enabled via 'Race Day' function (activated manually) via software controlled by PE cell at dusk to turn on at 20% (LED drivers to be dimmable).
- Lights shall dim up to 100% 5 mins before race start.
- Races will be run typically 30 minutes apart for 5 to 6 mins. As LED technology can be easily dimmed, the lights will be gradually dimmed between races. Lights shall dim down to 20% between races if required. Over a period of 2 minutes lights can be dimmed down to 20% to 30% of the maximum levels.
- Lights shall be extinguished or dimmed down at 10pm or as per DA requirements.
- Potential separate switching/control of Kensington track & course proper.

Figure 20 Example of similar variable lighting illumination at a racecourse in England



Entire track illuminated



Track illumination – 6 Furlongs



Track illumination – 5 Furlongs (Main straight only)



Entire track dimmed between races

Source: Musco

### 3.3.4. Diesel Generators

The lighting design and methodology for electricity supply has been prepared by IGS and is detailed in **Appendix E**.

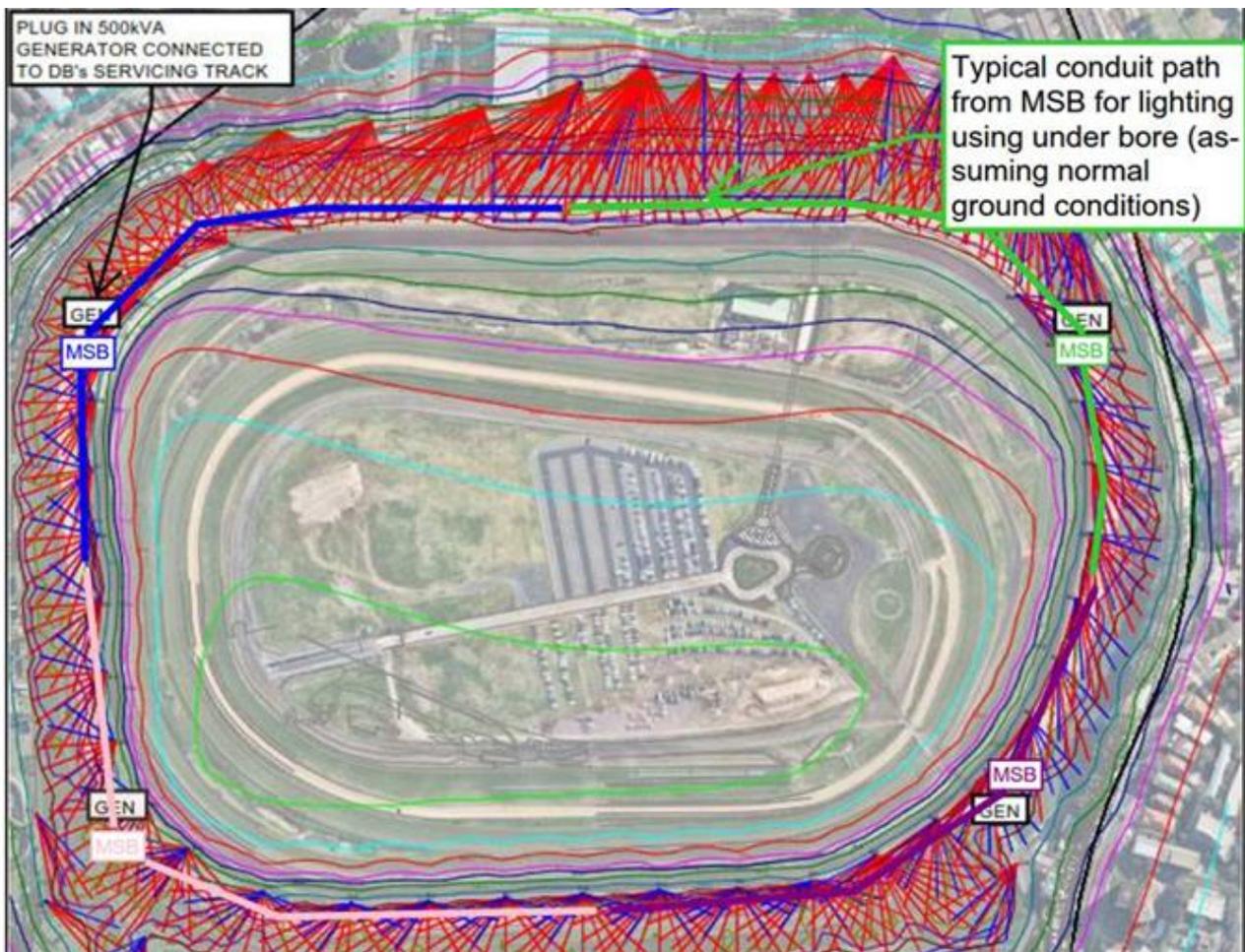
IGS identifies the supply of electricity to operate the proposed trackside lighting will be supplied via four (4) diesel generators for the trackside lighting. The upgraded Spectator Precinct lighting will remain powered by mains. Refer to **Section 3.4** for details on the Spectator Precinct lighting.

The diesel generators will be located infield on each corner of the Course Proper. Each diesel generator will be connected to a respective **MSB** at each location. Each MSB will contain dimmable relay modules to control the brightness of the proposed trackside lighting.

Conduits are proposed for cable reticulation emanating either side of the diesel generators/MSB locations, to supply electricity to each light column. Conduits are proposed to be installed using under bore methodology.

Refer to **Figure 21** below for the proposed indicative location of the diesel generators and MSB.

Figure 21 Indicative layout for proposed temporary diesel generators and MSB



Source: IGS

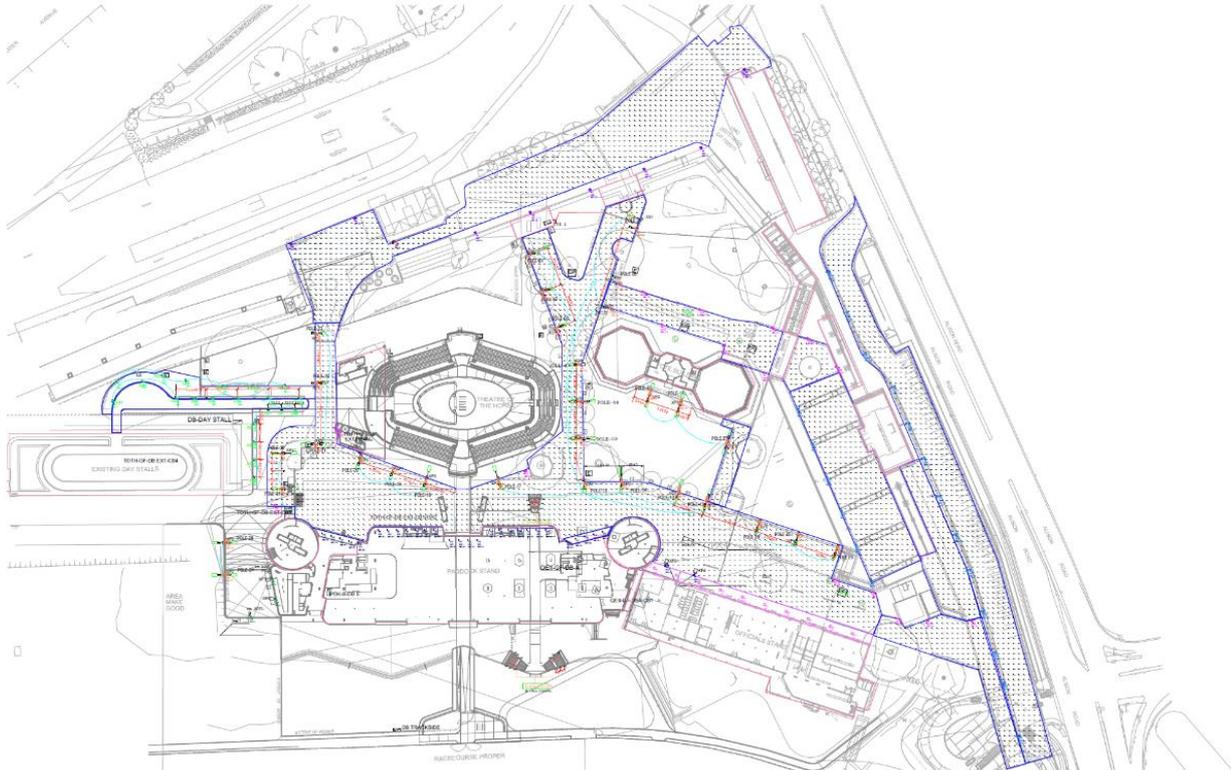
### 3.4. UPGRADE TO SPECTATOR PRECINCT LIGHTING

An upgrade to the Spectator Precinct lighting is required to provide maximum safety to patrons and racecourse personnel within the vicinity of the precinct after dark. Details of the lighting upgrade works required within the Spectator Precinct are illustrated in **Figure 22** below and in **Appendix E**.

The upgrade of Spectator Precinct lighting will include the Steward's areas, Theatre of the Horse, outdoor carparks and amenities all set back within the site. Luminaires in the Spectator Precinct are being upgraded to LED sources and poles are a maximum of 10m high. The requirements for lighting intensity will be lower than that required for the racetrack.

All upgraded Spectator Precinct lighting will be powered through the existing electricity grid connection.

Figure 22 Spectator precinct upgrade lighting upgrade layout



Source: IGS

### 3.5. DEMOLITION

No demolition is proposed as part of this application.

### 3.6. ACCESSIBILITY

The site has several vehicle and pedestrian access points, which the proposed development will utilise. Based on recommended acoustic and traffic mitigation measures from technical reports, the EOMP identifies the use of certain existing entry points. This includes restricting use of the pedestrian exit via Ascot Street after 10pm at night racing events.

Details of existing and proposed access and egress for night racing events are detailed in the Traffic Impact Assessment report prepared by PTC contained in **Appendix J** and the Noise Assessment report prepared by GHD contained in **Appendix H**.

### 3.7. LANDSCAPING AND TREE RETENTION

There are no trees proposed to be removed as part of this application. Whilst lighting columns have been located to suit tree protection zones (TPZ) and the required structural footings, the exact final location of poles may vary by up to 10% due to arborist's advice and during the detailed design stage.

Mitigation measures proposed within the Visual and Landscape Impact Report by Sturt Noble (**Appendix I**) recommends new planting along the edge of the site boundary in the following locations as a long-term solution for visual screening:

- New planting to infill gaps in the existing tree line along Alison Road.
- Large new tree planting along the edge of RRR near Doncaster Avenue residences.
- Large new tree planting around the High Street entrance to RRR.

The specific details of this planting will be determined following approval.

### **3.8. STAGING OF PHYSICAL WORKS**

The staging of physical works is proposed to provide flexibility for works to be undertaken within the operational calendar requirements for the ATC. The staging of physical works is proposed as follows:

- Stage A: Upgrading of existing Spectator Precinct lighting
- Stage B: Installation of trackside lighting

The ATC reserves the right to undertake the above stages independently, concurrently or in either order.

## 4. STATUTORY CONTEXT

### 4.1. STATUTORY OVERVIEW

An overview of the relevant statutory planning requirements is outlined in Table 9 and discussed in the following subsections.

Table 9 Statutory requirements

Category	Action
Power to grant approval	<p>Schedule 2 of <i>State Environmental Planning Policy (State and Regional Development) 2011</i> identifies any development within the RRR site as SSD if the capital investment value (CIV) is more than \$10 million. The proposed CIV for the development is \$23.4 million. The Quantity Surveyor's report is included in <b>Appendix D</b>.</p> <p>As the proposed development will exceed \$10 million CIV, the Minister is the consent authority for development application(s) for the project pursuant to section 4.36(1) of the Act.</p>
Permissibility	<p>The site is zoned RE1 – Public Recreation in the Randwick LEP 2012.</p> <p>The proposed development continues the existing racecourse use on site, defined as <i>Recreation facilities (major)</i> and is permissible with consent in the RE1 zone. Refer to further discussion in <b>Section 4.2.5</b>.</p>
Other approvals	<p>There are no additional approvals required to carry out the project.</p> <p>However, this approval seeks to replicate or extend the same conditions of consent as approved in MP10_0097 MOD 2 and SSSA 10285 for horse racing events.</p>
Pre-condition to exercising the power to grant approval	<p>An assessment of the mandatory pre-conditions that must be satisfied before the Minister may grant approval to the project are outlined in <b>Section 4.2 – Section 4.2.6</b>.</p>
Mandatory matters for consideration	<p>An identification of the matters for consideration is outlined in the Mandatory Considerations Table at <b>Appendix C</b>. The proposal demonstrates a high level of compliance with the applicable statutory requirements.</p>

## 4.2. IDENTIFICATION OF APPLICABLE STATUTORY REQUIREMENTS

### 4.2.1. Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning & Assessment Act 1979* (the Act) provides the principal legislative framework for environmental planning in NSW and include provisions to ensure that proposals that have the potential to impact the environment are subject to detailed assessment and provide opportunity for public involvement.

The proposed development has been assessed in accordance with the matters of consideration listed in Section 4.15 of the EP&A Act as outlined in the Mandatory Considerations Table provided at **Appendix C**.

## 4.2.2. Environmental Planning and Assessment Regulation 2000

Section 4.12(8) of the Act requires that all development applications for SSD be accompanied by an EIS prepared by or on behalf of the applicant in the form prescribed by the *Environmental Planning and Assessment Regulation 2000* (the EP&A Reg).

Schedule 2 of the EP&A Reg provides that environmental assessment requirements will be issued by the Secretary with respect to the proposed EIS. This EIS has been prepared to address the requirements of Schedule 2 of the EP&A Reg and the SEARs.

## 4.2.3. Heritage Act 1977 (NSW)

This SSDA does not constitute Integrated Development pursuant to section 4.46 of the EP&A Act as the site does not contain any state heritage listed item(s).

## 4.2.4. State Environmental Planning Policies

Identification of the applicable State Environmental Planning Policies (SEPPs) are outlined below and discussed further in the Mandatory Considerations Table at **Appendix C** and **Section 6**.

### 4.2.4.1. State Environmental Planning Policy (State and Regional Development) 2011

Schedule 2 of the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) identifies 'Royal Randwick Racecourse' as being a site of State Significant Development (SSD).

Pursuant to Schedule 2 Clause 4 of the SRD SEPP, the proposed development is considered State Significant Development (SSD) as identified below:

#### 4 Development at Royal Randwick Racecourse

*Development on land identified as being within the Royal Randwick Racecourse Site on the State Significant Development Sites Map if:*

- (a) it has a capital investment value of more than \$10 million, or*
- (b) it is for the purposes of an event that is not a race day event.*

### 4.2.4.2. State Environmental Planning Policy No.55 – Remediation of Land

State Environmental Planning Policy No.55 (SEPP 55) states that land must not be rezoned or developed unless contamination has been considered and, where relevant, land has been appropriately remediated.

The SEAR's issued for SSD 8706 by the Department of Planning and Environment do not identify any concerns or requirements regarding potential contamination on the site. The proposed development is for the continued use of the site for racing and does not include any earthworks or significant disturbance to the grounds of the racecourse.

### 4.2.4.3. State Environmental Planning Policy No.64 – Advertising and Signage

The SEAR's identifies the requirement for assessment of *State Environmental Planning Policy No.64 – Advertising and Signage* (SEPP 64). There is no new or additional signage or advertising proposed as part of this development application.

### 4.2.4.4. State Environmental Planning Policy (Temporary Structures)

*State Environmental Planning Policy (Temporary Structures)* was renamed as *SEPP (Miscellaneous Consent Provisions) 2007* as part of the 'amending SEPP' in 2013. *SEPP (Miscellaneous Consent Provisions) 2007* contains provisions for temporary structures to be permissible with consent.

Clause 12 of the *SEPP (Miscellaneous Consent Provisions) 2007* provides matters for consideration before consent can be granted for the erection of a temporary structure. An assessment of the proposed temporary diesel generators to be located on site to service the track lighting, has been undertaken and summarised in the Mandatory Considerations Table provided at **Appendix C**.

## 4.2.5. Randwick Local Environmental Plan 2012

The *Randwick LEP 2012 (RLEP 2012)* is the principle environmental planning instrument applying to the site. The relevant RLEP provisions applicable to the SSD are reviewed in the Mandatory Considerations Table provided at **Appendix C**. The proposal is consistent with the relevant objectives and provision of RLEP 2012.

## 4.2.6. Randwick Comprehensive Development Control Plan 2013

The Randwick Comprehensive Development Control Plan 2013 (**RDCP 2013**) applies to the site. Specifically, Part E – Royal Randwick Racecourse overrides similar provisions in other parts of the DCP unless otherwise noted.

Clause 11 of the SRD SEPP states:

### **11 Exclusion of application of development control plans**

*Development control plans (whether made before or after the commencement of this Policy) do not apply to:*

*(a) State significant development, or*

*(b) development for which a relevant council is the consent authority under section 89D (2) of the Act.*

As such, there is no requirement for assessment of the RDCP 2013 for this SSDA. Notwithstanding, the Mandatory Considerations Table provided at **Appendix C** provides an assessment of the proposal against the relevant controls of the RDCP 2013, Part E – Royal Randwick Racecourse and demonstrates the proposal is consistent with the objectives of the DCP.

# 5. COMMUNITY AND STAKEHOLDER ENGAGEMENT

## 5.1. IDENTIFICATION OF KEY STAKEHOLDERS

This section describes the consultation that has been undertaken by the project team in response to the SEARs issued by DPIE on 21 September 2017. Precinct Consulting were engaged to conduct the community and stakeholder consultation strategy, and facilitate community drop-in events. The Community and Engagement Report prepared by Precinct Consulting is in **Appendix O** which summarised the community consultation undertaken to date and key issues raised, as well as outlines the proposed ongoing community consultation the Proponent is committed to undertake.

Item 14 of the SEARs identified consultation is required with Randwick City Council, RMS, Sydney Coordination Office and Sydney Light Rail team within TfNSW, NSW Police and local community groups. Prior to undertaking consultation, the project team further defined the relevant community and stakeholder groups:

Table 10 Stakeholders identified for consultation

Category	Stakeholders
Local residents and Stakeholders	<ul style="list-style-type: none"> <li>▪ Local residents and neighbours in surrounding Streets</li> <li>▪ Moore Park Event Operations Group (undertaken through ATC's existing channels)</li> <li>▪ The University of NSW, including UNSW Student Accommodation Unit and UNSW Village</li> <li>▪ Local Precinct Committees surrounding Royal Randwick</li> <li>▪ Centennial Park and Moore Park Trust</li> <li>▪ Kensington Public School</li> <li>▪ Randwick TAFE</li> <li>▪ Prince of Wales Hospital</li> <li>▪ Montefiore Aged Care</li> <li>▪ Eastern Beaches Local Area Police Command (undertaken through ATC's existing channels)</li> </ul>
Local MPs	<ul style="list-style-type: none"> <li>▪ Michael Daley, State Member for Maroubra</li> <li>▪ Bruce Notley-Smith, State Member for Coogee</li> <li>▪ Matt Thistlethwaite, Federal Member for Kingsford Smith</li> </ul>
Relevant Government Ministers	<ul style="list-style-type: none"> <li>▪ Paul Toole, NSW Minister for Racing</li> <li>▪ Stuart Ayres, NSW Minister for Sport</li> <li>▪ Adam Marshall, NSW Minister for Tourism and Major Events,</li> <li>▪ Steven Ciobo, Federal Minister for Trade, Tourism and Investment</li> </ul>
Government organisations and agencies	<ul style="list-style-type: none"> <li>▪ Randwick City Council</li> <li>▪ Destinations NSW</li> <li>▪ Greater Sydney Commission</li> </ul>
Peak bodies	<ul style="list-style-type: none"> <li>▪ Transport and Tourism Forum</li> <li>▪ Committee for Sydney</li> </ul>
Racing Industry	<ul style="list-style-type: none"> <li>▪ Racing NSW</li> <li>▪ Relevant industry stakeholders including ACT members and racegoers</li> </ul>

## 5.2. ENGAGEMENT ACTIVITIES

Precinct Consulting developed a range of tools and activities to successfully communicate and engage with the identified community and stakeholders. These included the following undertaken in 2017:

- **Stakeholder correspondence:** Written communication to provide an overview of the proposed night racing and to offer more detailed briefing to key stakeholders, including Randwick City Council, UNSW, Prince of Wales Hospital, local MPs, relevant Government Ministers, tourism agencies, peak bodies and racing industry stakeholders.
- **Letterbox drop to neighbours:** A notification and invitation to attend community drop-in events was distributed via letterbox to approximately 4,100 local residents. The notification was also sent to the UNSW Student Accommodation Unit for distribution to university students residing in colleges fronting High Street.
- **Frequently Asked Questions (FAQ) sheet:** A FAQ sheet was produced and made available at drop-in events to provide answers to general questions about the proposal.
- **PowerPoint presentation:** A PowerPoint presentation was prepared and used for briefings with stakeholders and local Precinct Committees. Content included a brief history of racing at Royal Randwick; overview of the night racing proposal; and the planning process.
- **Project boards:** Six (6) x A1 project boards were produced for display at community drop-in events. Content included a brief history of racing at Royal Randwick; overview of the night racing proposal; artists impression of lighting positions; and outline of the planning process.
- **Community and stakeholder briefings:** As of 23 October 2017, information regarding the proposed night racing has been presented to the following:
  - Moore Park Event Operations Group on (overview provided on 3 October 2017 meeting as part of ATC's existing communication).
  - Randwick Precinct Committee (on 4 October 2017).
  - Kensington and West Kingsford Precinct Committee (on 9 October 2017).
  - UNSW Student Accommodation Unit and UNSW Village (on 13 October 2017).
- **Community drop-in events:** Two community drop-in sessions were held as a primary engagement activity to inform local residents and other interested stakeholders about the proposed night racing at Royal Randwick and enable direct two-way communication with the project team.

Table 11 Drop-in session timetable

Session	Date	Venue
Session 1	Wednesday 18 October 2017 5:30pm – 7:30pm	Randwick Racecourse Owner's Pavilion
Session 2	Saturday 22 October 2017 5:30pm – 7:30pm	Randwick Racecourse Owner's Pavilion

- **ATC telephone number:** The ATC's main telephone number was provided as part of communication material to enable a direct contact point for the community to speak with the project team. The number will continue to be maintained as a means of providing a two-way communication channel during the planning process.
- **Project email:** A project email address [nightracing@australianurfclub.com.au](mailto:nightracing@australianurfclub.com.au) was established and included on community notifications and will continue to operate during the planning process.

- **Online communication:** Information about the night race lighting proposal is being prepared for inclusion on the ATC's website and social media channels to provide an efficient means of disseminating relevant information to the community and racing industry.
- **ATC existing communication channels:** Information about the night racing proposal has been scheduled for inclusion in the ATC's existing communication channels, as well as with media to provide information to industry and the race going public.

A second stage of communication and engagement with the identified community and stakeholders was undertaken in March and April 2021, prior to the finalisation of the EIS. These included the following:

- **Stakeholder correspondence and briefings:** Written communication was sent to key stakeholders including Randwick City Council, UNSW, PoWH, local MPs, peak bodies and racing industry stakeholders to provide an update on the ATC's proposal and a summary of the amendments resulting from the 2017 feedback.
- **Letterbox drop to neighbours:** A second letterbox drop with an update on the proposal was distributed at the end of March 2021 to approximately 4,200 local residents.
- **ATC telephone number, project email and online communication:** all existing communication channels provided in the first stage of communication and engagement were made available and referenced in the letterbox drop collateral. These channels will remain open during assessment of the EIS.

A copy of all the above collateral is provided as part of the Community Consultation Strategy contained in **Appendix O**.

It is noted that the communication and engagement activities outlined above coincided with detailed consultation with relevant Government authorities and service providers (including RMS, Sydney Coordination and Sydney Light Rail team within TfNSW), undertaken by the relevant technical consultants. Findings of this consultation is addressed in the respective sections of this EIS.

### 5.3. ENGAGEMENT FEEDBACK

Precinct Consulting compiled feedback, issues and suggestions from the engagement program received through a variety of different channels. These include comments and questions raised during briefings with community groups, comments received via feedback forms (completed at drop-in events); and through the project email and/or ATC telephone number.

Table 12 Summary of engagement

<b>Who participated</b>
<ul style="list-style-type: none"> <li>▪ Information has been provided to 22 different stakeholder groups</li> <li>▪ 3 project briefings have been held</li> <li>▪ 4,100 notifications have been distributed via letterbox drop</li> <li>▪ At least 37 people have attended briefings provided by the ATC at two local Precinct Committee meetings</li> <li>▪ 21 people attended the two drop-in events on 18 and 22 October</li> <li>▪ 7 feedback forms have been completed, and 10 emails or all calls have been received</li> </ul>

Attendees who provided their details at the drop-in events came from:

Doncaster Ave, Kensington	Prince St, Randwick
Alison Rd, Randwick	Kyanaston Ave, Randwick
Ascot St, Kensington	Bradley St, Randwick
King St, Randwick	Darley Rd, Randwick
Burton St, Randwick	Frances St, Randwick

The ATC received a diverse range of views from those who provided feedback. While a small number of people expressed opposition to night racing events, this was contrasted by comments from a similar number of people who welcomed the introduction of night racing at RRR. Below is a summary of received feedback compiled by Precinct Consulting:

- The majority of people who provided feedback during the period of engagement appeared to acknowledge that night events are now a regular feature on many sporting calendars.
- Most of the comments received during drop-in events, in emails, on feedback forms, or from Precinct Committee meetings related to potential impacts on the amenity of neighbours and local residents.
- The main issue related to anti-social behaviour by people attending events. Numerous people commented about incidents of drunk and aggressive behaviour by spectators leaving RRR after race meetings.
- Other issues raised included:
  - traffic congestion and parking.
  - the capacity of the public transport system to accommodate racegoers during peak hour.
  - potential noise from amplified music during or after race meetings.
  - the expected timeframe for crowds to exit the area after race meetings.
  - the number of night race meetings and whether racing events would be held on consecutive days/nights.
  - light spill.

As identified in **Section 5.2**, a second round of communication with the community was undertaken in March and April 2021. At the time of finalising the EIS, the proponent team are monitoring the engagement channels for any further comments in addition to the above issues.

## 5.4. ENGAGEMENT NEXT STEPS

Noting the complexity and public nature of the project, the ATC will continue to provide information and receive feedback throughout the assessment process. This will include mechanisms to provide information and to respond to enquiries received via email, telephone or through ATC's existing relationships.

Additional and ongoing consultation activities will also be undertaken and include:

- Continued liaison with key stakeholders including Eastern Beaches Local Area Command and Moore Park Event Operations Group (MEOG).
- Engagement with racing industry stakeholders.
- Updates to local residents who participated in earlier communication and engagement.
- Presentations to local Precinct Committees, as required.
- Direct engagement with properties that have the potential to be impacted by light spillage to discuss mitigation options.

In addition to engagement coordinated by the project team, community members and other stakeholders will have the opportunity to have their say by lodging formal submissions during the public exhibition period.

## 5.5. SUMMARY

The Communication and Engagement Report **Appendix O** prepared by Precinct Consulting comprised a program of communication and engagement activities, and compiled feedback received from local residents, local community groups, and key stakeholders during the preparation of the EIS.

The report concluded that:

- Whilst a small number of people expressed opposition to night racing events, a similar number of people welcomed the introduction of night racing at Royal Randwick.
- Issues raised by participants of the consultation program included anti-social behaviour, traffic congestion, potential noise, frequency of night racing events, and light spill.

Feedback from this consultation has informed decision making and mitigation measures identified throughout this EIS. Due to the public nature and sensitivity of this proposal, the proponent will actively continue to provide information and receive feedback with stakeholders during the assessment process.

# 6. ASSESSMENT OF ENVIRONMENTAL IMPACT

## 6.1. LIGHT SPILL

### 6.1.1. Overview

IGS were engaged to undertake a Lighting Impact Assessment of the proposed night racing events at RRR. The Light Impact Assessment is contained in **Appendix E** and has been prepared in accordance with Item 6 of the SEARs issued by DPIE on 21 September 2017.

In preparing the Light Impact Assessment, IGS undertook 3D spatial modelling of the surrounding area to identify potential light spill affects beyond RRR. The modelling was used to guide the lighting design to minimise light spill impacts on surrounding properties, including sensitive receivers such as private dwellings.

Through careful lighting design solutions, the proposal is fully compliant with the required standards as listed below and any lighting impacts on surrounding properties is minimal and acceptable for approval.

- *AS 2560.1:2002 Sports Lighting - General Principles*
- *AS/NZS 4282:2019 Control of Obtrusive effects of outdoor lighting*
- *AS/NZS 1158.2:2005 Lighting for roads & public spaces*
- *AS/NZS 3827.1:1998 Lighting system performance – accuracy and tolerances*
- *CIBSE Lighting Guide 4: Sports Lighting, Section 7a Lighting for television*
- *OP-31 Free TV Australia Operational Practice, Lighting Requirements for Television*

Mitigation measures are proposed to further minimise any potential amenity impacts, as detailed in the Mitigation Measures table at **Appendix B**.

### 6.1.2. Methodology

#### 6.1.2.1. Identification of sensitive areas

Prior to the design process, IGS identified the potential sensitive receivers adjacent to RRR, as shown in the below table.

Table 13 Sensitive receivers

<b>Boundary 1 – Alison Road to the North</b>	<ul style="list-style-type: none"> <li>▪ Between the racecourse site boundary and the dwellings across the road are dense evergreen trees;</li> <li>▪ Possible side view of grandstand floodlights, being 300m to 500m away;</li> <li>▪ Close to 1600m starting chute where pole heights are 27.4m;</li> <li>▪ Close to straight 1</li> </ul>
<b>Boundary 2 – Wansey Road to the East</b>	<ul style="list-style-type: none"> <li>▪ Between the racecourse site boundary and the dwellings across the road are dense evergreen trees;</li> <li>▪ Direct view of grandstand floodlights, being 800m to 900m away;</li> <li>▪ Close to 1400m starting chute where pole heights are between 18.3m &amp; 27.4m.</li> </ul>
<b>Boundary 3 – High St to the South West</b>	<ul style="list-style-type: none"> <li>▪ Between the racecourse site boundary and the dwellings across the road are some dense evergreen trees;</li> <li>▪ Direct view of grandstand floodlights, being 900m away;</li> <li>▪ Close to 1400m chute where pole heights are 27.4m.</li> </ul>
<b>Boundary 4 – Doncaster Ave to the West</b>	<ul style="list-style-type: none"> <li>▪ Dwellings close on turn 4;</li> <li>▪ Not in direct line of view of grandstand floodlights, being 450m to 500m away.</li> </ul>

Source: IGS

### 6.1.2.2. Design Criteria

The design of the proposed lighting has been in development since early 2017 and has been developed through multiple iterations as lighting technology has continued to evolve over time. The proposed design has been developed in partnership with an international sports lighting designer with experience designing for large scale sporting venues across the world, including stadiums, horse racing tracks and international motorsport racing venues.

As detailed in **Section 3.3** of this EIS report, the track lighting has been designed to meet specific broadcasting standards. Accordingly, the lighting must provide specific lux levels at certain points cross the track to ensure that horses, jockeys and saddlecloths are clearly visible for broadcasting and spectators in the Grandstand, whilst also not emitting glare to the cameras or grandstands.

A trackside lighting layout has been designed to position the light columns to achieve the required lighting levels across the track measured at 1.0 metre above ground level. The proposed trackside lighting is shown in **Section 3.3** of this EIS.

### 6.1.2.3. Modelling

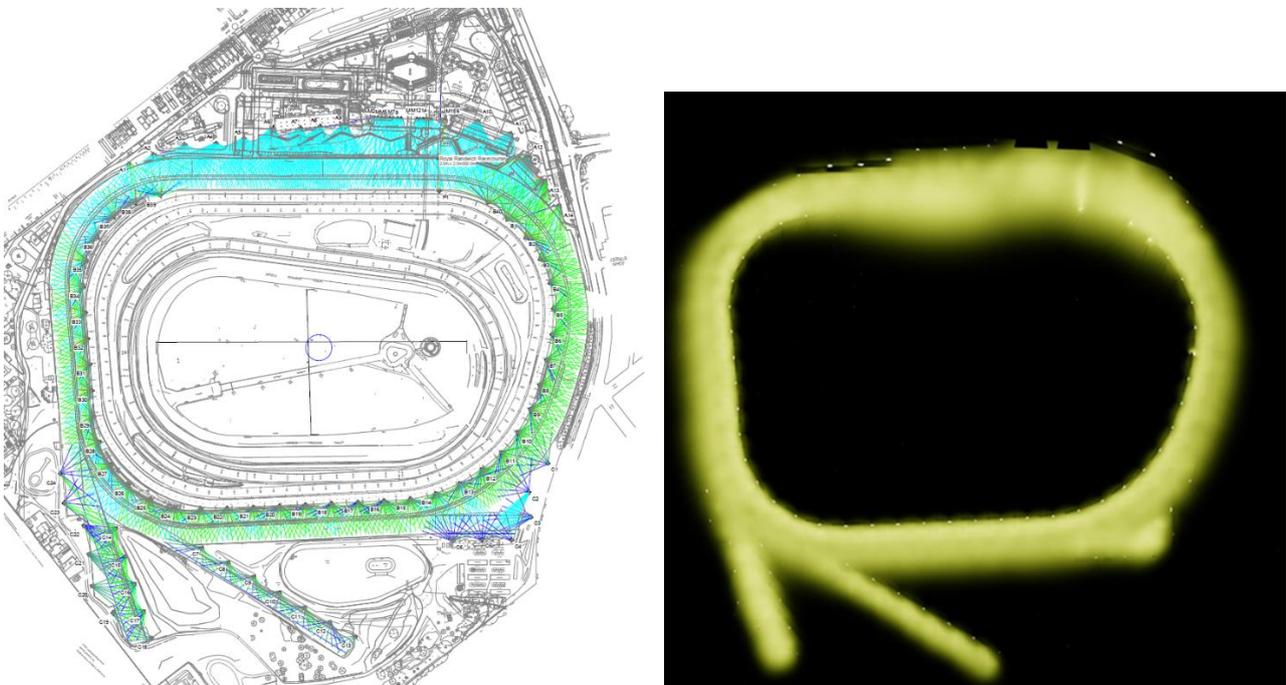
The Lighting Impact Assessment utilised a 3D spatial model of the topography of RRR and the surrounding area. In addition, the 3D model included detailed analysis of surrounding building locations and heights, window sizes and locations, dense evergreen trees and physical obstructions to determine the precise level of light spill beyond the site.

**Figure 23** shows the modelling undertaken for the lighting design with basic visualisation (left) and a render of the lighting (right) to provide an indication of the extent of lighting contained within the track.

Whilst the centre of the track appears black in the render in **Figure 23**, for example, if a person were to stand in that area, they would not have the effect that they are standing in complete darkness since the human eye will adapt to the darker environment, allowing more light to enter the pupil and provide a brighter perceived environment.

**Figure 24** and **Figure 25** provides indicative renders of how the site will appear when the racecourse is lit during racing events.

Figure 23 Lighting model (left) and render (right)



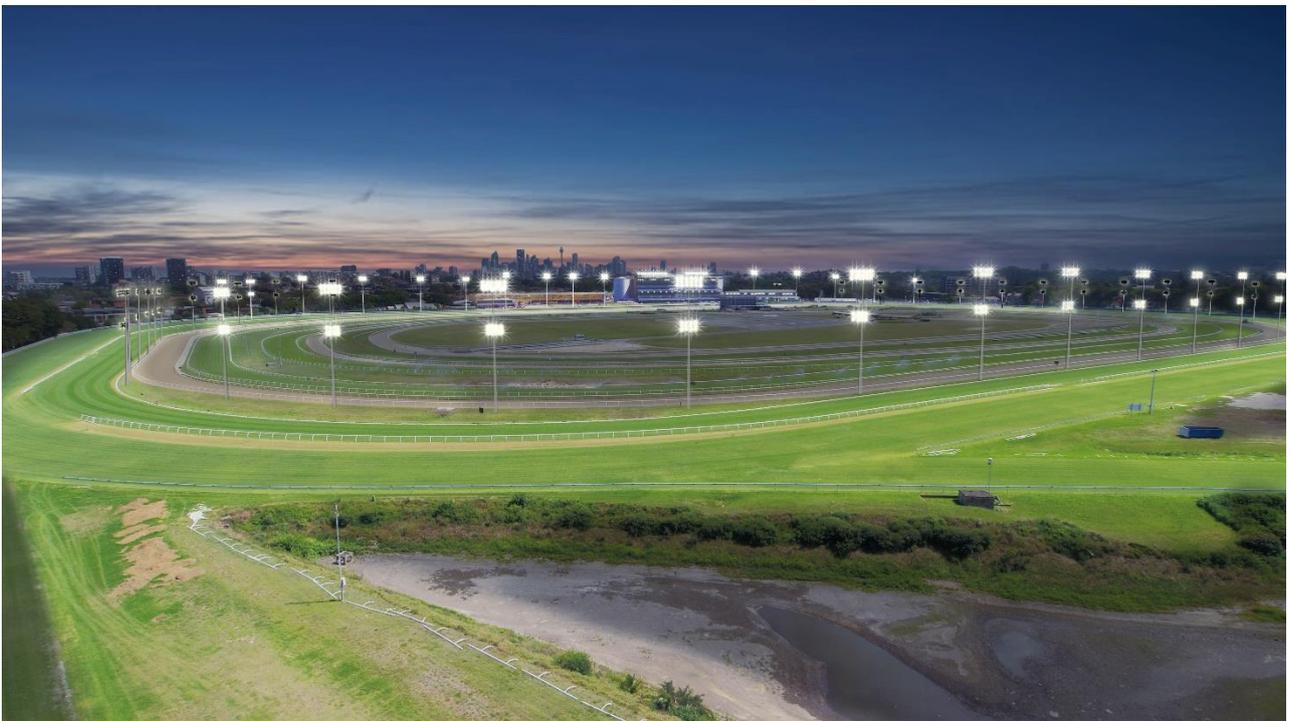
Source: IGS

Figure 24 Render of night racing at RRR, looking towards UNSW



Source: ATC

Figure 25 Render of night racing at RRR, looking towards Sydney CBD



Source: ATC

#### 6.1.2.4. Comparison with existing case studies

To support the proposal, a desktop review was undertaken to identify best practice for lighting of sport venues for night time events. IGS identified existing horse racing courses and sporting stadiums where lighting is installed to TV broadcast lighting requirements. The table below shows the number of events held per year at some of these venues, which are consistent with what is proposed at RRR.

Many of the below venues are also nearby residential (sensitive) areas and therefore are similar to RRR in terms of acceptable impacts and management.

Table 14 Comparative existing night racing venues in Australia

Name	State	Number of Night Race Meetings Per Year	Surrounding Interface
Sunshine Coast Racecourse	QLD	15	Non-sensitive
Toowoomba Racecourse	QLD	37	Sensitive
Moonee Valley Racecourse	VIC	17	Sensitive
Cranebourne Racecourse	VIC	16	Sensitive & Non-sensitive
Canterbury Racecourse	NSW	10	Sensitive
Launceston Racecourse	TAS	17	Sensitive
Wentworth Park (Greyhounds)	NSW	104	Sensitive

Source: IGS

Canterbury Racecourse is referenced as an important example due to being in NSW and managed by the ATC. This site began night race meetings in 1998 and continues to be popular with patrons. The approval for this operation contains conditions specifically related to lighting where:

- 12 race meetings per year from 5pm to 11pm.
- Bear reasonable costs associated with Council engaging monitoring experts for one meeting in the first years of operations if required.
- Lighting equipment and accessories to be non-reflective.
- Redirect or fit louvres if necessary, to prevent adverse effects to residential properties or rail users.

Figure 26 Canterbury Racecourse – existing lighting infrastructure



Picture 3 View of grandstand from Turn 1



Picture 4 View south west across Canterbury Racecourse, pole heights up to 40m

Source: IGS

Lighting levels were also surveyed at Canterbury Racecourse to understand the light spill scenario on adjacent lots and how that may be extrapolated to understand potential light impacts at RRR. Illuminance level measurements were taken with a calibrated light meter at 5m intervals at 1.5m above ground level on the relevant boundaries of Canterbury Racecourse.

This was carried out on Monday 11 September 2017 at 6.30pm after the metal halide lamps had been running for one (1) hour. It is noted that the lighting technology at Canterbury Park is over 20 years old and newer technology would provide improved outcomes.

Table 15 Lighting levels at Canterbury Racecourse

Boundary Number	Boundary Location (refer Appendix E)	Lux Min at 1.5m (Ev)	Lux Max at 1.5m (Ev)	Average Lux
1	King St edge of vacant land opposite Turn 1	4	22	8
2	Back Straight (part)	112	472	292
3	Turn 3	80	324	258
4	Turn 4 & ends of Crieffe & Mallyen Streets	3	80	28

Source: IGS

### 6.1.3. Assessment

Based on the methodology and information collected through the design process, including using 3D spatial modelling, racetrack lighting design criteria and potential supplier design details, IGS modelled the light spill across RRR to identify areas where potential unacceptable light spill would occur, based on the adopted trackside lighting plan.

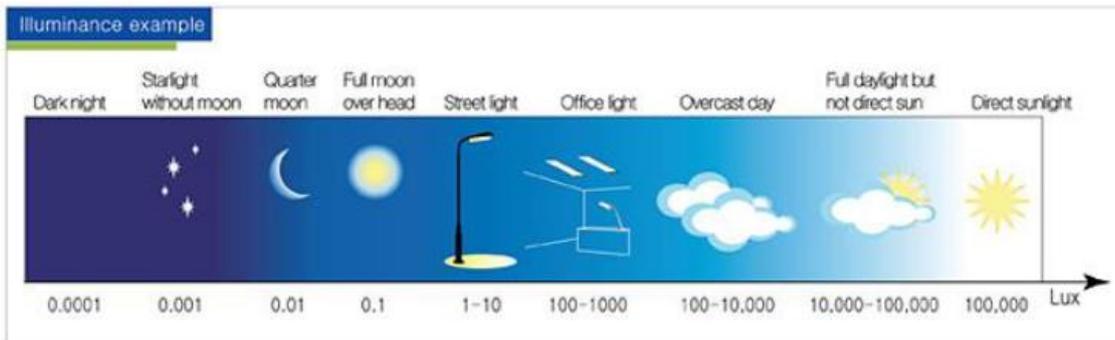
IGS note that there is not any specific Australian Standard or formal adopted measure to determine what is an acceptable level of light spill from this form of lighting on adjoining sensitive receivers. However, a number of relevant standards, including Australian Standard AS 4282:2019, have been applied to assess the light spill impacts on adjoining land uses. Refer to Table 3.4 and Section 5.5 and 5.6 of **Appendix E** for further explanation.

Based on the assessment framework established by IGS, light spill onto adjoining properties within 50 to 100 metres of the edge of racecourse should not exceed 110 lux to be considered an acceptable impact. This threshold has informed the proposed design to minimise light spill through the implementation of lighting baffles and louvres, to ensure that light spill onto adjoining properties (within 100m of the RRR boundary) is less than 110 lux.

Modelling identified that the sensitive receivers located on Boundary 4 (Doncaster Ave to the West) in **Table 13** would have the greatest potential for light impacts due to their proximity to the site boundary. However, detailed modelling of light spill measured at the vertical face of the rear façade of the dwellings located nearest to Turn 4, indicates that lux levels on the dwellings would only be 0.18 to 39.64 lux. These levels are considered well below the threshold of 110 lux for acceptable light levels. Lighting levels calculated at the vertical face of surrounding properties do not take into account blocking of light by trees on the boundary of the racecourse and dwellings, and so light spill is likely to be lower in reality.

IGS also identifies that in Sydney between October and April, the sun sets between 6.50pm to 8pm. Sunset is when the sun is below the horizon. It is not until the sun reaches 18 degrees below the horizontal that it becomes 'night' (some 30 minutes later). Daylight produces 100,000 lux, an overcast day provides 1,000 to 2,000 lux and there is approximately 400 lux at sunset on a clear day.

Figure 27 Illuminance example



Source: IGS

Using the above parameters, IGS concluded that due to natural light levels, the proposed lighting at RRR and any minimal light spill from the racecourse would not be as noticeable until between the hours of 7.20pm to 8.30pm (depending on whether the event is held beginning, end or mid-summer) up to the end of the racing schedule at 10pm. This equates to approximately 34 hours per racing season for the lighting to be noticeable.

Taking into account the proposed management of lighting so that track lighting is dimmed between races and that each race lasts between 5-7 minutes, the amount of time the lights will be on at full intensity during "night" is reduced significantly to approximately 8.5\* hours per racing season.

\* This is based on a 40 minute race to race turnaround of which 10 minutes would be at full brightness.

Based on the above assessment, it is considered that through careful design and implementation of the proposed lighting infrastructure, the potential light spill impacts on adjacent properties is minimal and acceptable. Considering the high ambient lighting of the surrounds of RRR and the limited hours of operation of the proposed lighting, there would also be minimal impact on flora or fauna.

Notwithstanding, mitigation measures proposed including dimming trackside lighting between races will further minimise any impacts on amenity of surrounding properties due to light spill. These are addressed in the following section.

## 6.1.4. Mitigation Measures

IGS recommend a number of mitigation measures which can be implemented within the mitigation zones to minimise the environmental impacts of the proposed lighting design.

Table 16 Summary of mitigation measures

Potential impact	Approach	Residual Impact
Elevated lighting levels at building façades on adjoining sensitive receivers.	Design features to minimise light spill, including baffles, shields have been incorporated into the proposal.	Following the implementation of proposed mitigation measure(s) the lighting levels to all surrounding receivers (including residential areas on Alison Rd and Doncaster Ave would be reduced to an appropriate level of <40 lux.
	Dimming of lighting between races (refer to <b>Section 3.3</b> )	Dimming of lighting between races will further minimise any potential light spill or adverse impact on amenity on surrounding sensitive receivers.
	Management of Spectator Precinct and Infield lighting	Photo-electric cells and time clocks to turn on and off lighting will allow for the minimised use of lighting as required for safe entry and egress of patrons.
	For a period of eighteen months post-installation, consultation with the community will be made available to assess any locations where a resident has concerns and mitigation can be discussed.	Post-installation consultation will allow for any unforeseen impacts on surrounding properties to be reviewed and mitigated. This will assist the ATC in maintaining a positive relationship with surrounding residents and businesses.
Unnecessary usage of materials and inefficient use of energy.	Design to minimise the number of luminaries required to achieve broadcasting standards and incorporate an appropriate maintenance regime.	The maintenance regime will reduce the required lumens required to achieve broadcasting standards. This would result in the brightness of each bank of luminaries being reduced, which will have a reduction in lux levels on the track and marginally reduce light spill.
	Dimming of lights, use of LED technology and using recyclable materials in the proposed design.	The proposed mitigation measures enhance efficiency and greater environmental sustainability.

## 6.1.5. Summary

In summary:

- The Light Impact Assessment (**Appendix E**) prepared as part of this EIS has assessed the potential locations where light spill could occur as a result of the proposed lighting to facilitate night racing at RRR. The location of the lighting is governed largely by televised racing broadcast standards, and therefore there is limited flexibility in the design.
- Incorporating best practice and latest technology into the proposed design has minimised any potential light spill on surrounding sensitive receivers within acceptable levels well below 100 lux. With the implementation of mitigation measures including dimming lights between races, the level of impact can be further reduced to only approximately 8.5 hours\* per racing season.
  - \* *This is based on a 40 minute race to race turnaround of which 10 minutes would be at full brightness.*
- Based on the above, the proposed lighting is considered of highest quality and acceptable for approval.

## 6.2. ACOUSTIC

### 6.2.1. Overview

GHD were engaged to provide an Acoustic Assessment (**Appendix G**) of the potential impact of introducing night racing at Royal Randwick in accordance with Item 7 of the SEAR's.

In response to the SEARs, GHD identified the surrounding sensitive receivers, and the likely noise generating sources and activities to ensure that an acceptable level of acoustic amenity could be achieved at each sensitive receiver. The Acoustic Assessment includes recommended mitigation measures which can be implemented to manage acoustic impacts on surrounding sensitive receivers.

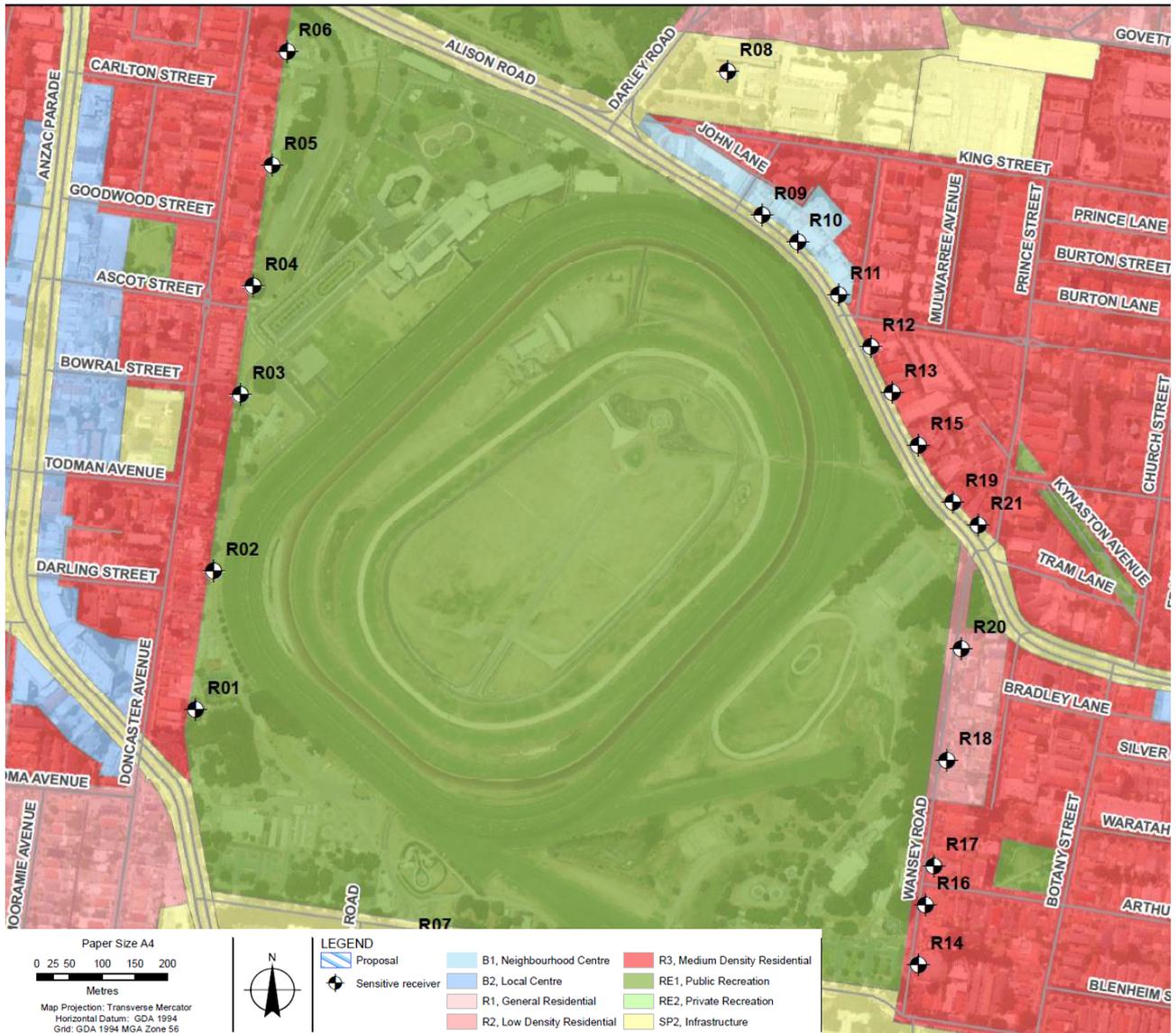
### 6.2.2. Methodology

#### 6.2.2.1. Establishing Background Noise Levels

To determine the underlying level of noise present in the surrounding environment, GHD identified 21 noise-sensitive receivers in the surrounding environment. The location of the site and the identified receivers are identified in Figure 28, and include:

- R01 – R06: Residential receivers located along Doncaster Avenue (to the west of the proposal)
- R07: University of New South Wales (to the south of the proposal)
- R08: Randwick TAFE College (to the north of the proposal)
- R09 – R13, R15, R19: Residential receivers located along Alison Road (to the north and east of the proposal)
- R14, R16 – R18, R20 – R21: Residential receivers located along Wansey Road (to the east of the proposal)

Figure 28 Representative background noise monitoring locations



Source: GHD

### 6.2.2.2. Proposed Criteria to Protect Amenity

The acoustic assessment identified that the night racing proposal included multiple elements, which required different criteria to be applied to protect amenity.

- **Review of management plans for amplified commentary and music** – To determine appropriate noise limits, GHD reviewed noise management plans for venues in the Sydney inner-city area. Based on this review, GHD concluded it was considered appropriate to apply the following noise criteria to amplified commentary and music related to the night racing events:
  - During the event, the A-weighted maximum sound pressure level ( $L_{Amax}$ ) of amplified commentary and music should be managed so that the noise level does not exceed 65 dB when assessed at the nearest sensitive receiver.
  - During the event, the C-weighted maximum sound pressure level ( $L_{Cmax}$ ) of amplified commentary and music should be managed so that the noise level does not exceed 80 dB when assessed at the nearest sensitive receiver.
- **Sleep disturbance from patrons leaving the events** – Based on the time of the events, it is likely that patrons will be leaving the event after 10 pm. As such, an assessment of sleep disturbance is warranted for this activity. Noise from the race event itself would not extend beyond 10 pm and has not been

considered as part of the sleep disturbance assessment. The Industrial Noise Policy recommends a maximum noise level assessment to assess potential for sleep disturbance impact, and an initial screening test to the following levels:

- LAeq(15 min) 40 dBA or the prevailing RBL plus 5 dB, whichever is greater, and/or
- LAFmax 52 dBA or the prevailing RBL plus 15 dB, whichever is greater.

If the screening test indicates there is a potential for sleep disturbance then a detailed maximum noise level assessment should be undertaken. The *Road Noise Policy* provides further guidance, which indicates that:

- maximum internal noise levels below 50–55 dBA are unlikely to cause awakening reactions which equates to 60 – 65 dBA outside considering a 10 dBA reduction for partially open windows
  - one or two noise events per night with maximum internal noise levels of 65–70 dB(A) are not likely to significantly affect health and wellbeing which equates to 75 – 80 dBA outside considering a 10 dBA reduction for partially open windows.
- **Traffic Generation** – GHD applied the *Road Noise Policy (DECCW 2011)*, which limits the increase in noise generated by traffic from a new development to 2 dB(A) above the current level.

### 6.2.2.3. Adopted Noise Criteria

Based on the adoption of the above methodology for protecting amenity, GHD adopted a project-specific noise criterion for amplified noise/ commentary and sleep disturbance, and a project-specific noise criterion for road traffic noise. The criterion is summarised in **Table 17** and **Table 18**.

Table 17 Adopted Noise Criteria – Amplified Music/ Commentary and Sleep Disturbance

Receiver	Time period	Amplified music or commentary		Sleep disturbance for patrons leaving the event, LAmax
		LAmax	LCmax	
Residential receivers	Evening	65	80	
	Early night shoulder period (10pm to 12am)	–1	-	52 <sup>2</sup>

Source: GHD

Table 18 Adopted project-specific noise criteria – road traffic noise

Location of receivers	Day	Night
	7am – 10pm	10pm – 7am
High Street and Alison Road	60 LAeq(15 hr)	55 LAeq(9 hr)
Doncaster Avenue and Ascot Street	55 LAeq(1 hr)	50 LAeq(1 hr)

Source: GHD

### 6.2.3. Assessment

The assessment of the noise impact from the proposed night racing events within the GHD report is based on the following two categories of events:

- Class 3 Event – 0 – 10,000
- Class 2 event – 10,001 to 15,000

Within these categories, the noise levels can be divided into ‘major’ and ‘minor’ races. Within each event, there is typically 2-3 major races that are louder than the remaining races.

In addition to the noise generated from the event, noise from patrons exiting the premises, via foot traffic and vehicles, has been assessed against for the period between 10 pm and midnight.

#### 6.2.3.1. Noise emissions from events

GHD have identified the two key sources of noise generation from events as follows:

- Commentator – race period.
- Post-race music and interview.

GHD have identified the anticipated maximum noise levels for these two sources of noise during the night-racing events, as outlined in **Table 19**. These noise levels are based on attended and unattended noise monitoring conducted at the site on the “Colgate Optic White Stakes Day” event on 16 September 2017, where 12,000 patrons attended. These noise monitoring results have been used conservatively for the assessment of Class 3 events (which has a maximum of 10,000 patrons).

Table 19 Maximum anticipated noise levels from Class 2 and Class 3 events

Source	Distance from source	Minor race		Major race	
		L <sub>Amax</sub> dBA	L <sub>Cmax</sub> dBC	L <sub>Amax</sub> dBA	L <sub>Cmax</sub> dBC
Commentator – race period	130m (Directly in front of grandstand)	68	80	75	82
Post-race music and interview		71	79	74	81

Source: GHD

GHD inputted the anticipated noise levels for noise emissions from events (commentator and post-race) into a CadnaA Version 2020 noise model to determine the impact on the 21 noise-sensitive receivers. This was then assessed against the adopted noise criteria as identified in **Section 6.2.2.3**. The results of the model indicate the L<sub>Amax</sub> and L<sub>Cmax</sub> noise emission from the amplified commentary and music is predicted to achieve compliance with the relevant noise criteria.

#### 6.2.3.2. Noise emissions from light generators

Mobile generators will be required to power some night racing lights. While the noise emitted will depend on the exact model of generator used, generators between 800 kVA – 1,200 kVA are nominated. The noise generated from these receivers have been assessed against the Noise Policy for Industry (NPI), and a conservative criteria of L<sub>Aeq, 15 min</sub> 35 dBA selected as the minimum for the night-time period.

The following is required to comply with this criteria:

- Generator enclosed within a sound attenuated enclosure;
- Maximum sound power level of 98 dBA.

The proposed generators will comply with these requirements and are located within a suitable area in the Infield to further reduce the impact on noise-sensitive receivers (refer to **Section 3.3.4**). Accordingly, GHD consider the noise emission from generators can achieve compliance with the relevant noise criteria.

### 6.2.3.3. Noise emission from patrons entering and exiting site

While racing is scheduled until 10pm, patrons are likely to be leaving RRR after this time. GHD modelled the potential acoustic impacts of patrons exiting and entering the precinct (via foot traffic and vehicle) and have assessed the anticipated noise levels against the night-time criteria. The GHD assessment was informed by noise monitoring taken at the multi-deck car park located adjacent to the Ascot Street exit. The findings of the noise assessment are summarised in **Table 20**.

Table 20 Noise levels of patrons and vehicles leaving

Source	L <sub>Amax</sub> noise level dB
Patron noise (based on the sound of a male shouting)	90 <sup>1</sup>
Car drive by	90
Car door slam	97

Source: GHD

GHD considered the impact of anticipated noise levels on sleep disturbance in the surrounding area, based on the following entry/ exit points to the site:

- Gate 1 (pedestrians / vehicles)
- Gate A and Gate B (pedestrians using buses)
- Gate 18 (vehicle access to members carpark)
- Gate 13 (vehicle access to infield carpark)

The assessment assumes:

- Gate 18 will be closed from 8pm except for members exiting the car park.
- All pedestrians will be directed to enter and exit the site via Gate 1, Gate A and Gate B.
- All taxis and Ubers will be directed to enter and exit the site via Gate 1 and Gate 18 (prior to 8pm close).

The key findings of the GHD assessment of sleep disturbance on residential receivers are:

- Sleep disturbance impacts are not predicted at the nearest sensitive receivers on Doncaster Avenue. 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. While the guidance within the Road Noise Policy suggests that the noise is unlikely to cause awakening reactions, mitigation measures are proposed to minimise the non-compliance.

### 6.2.3.4. Noise emission from traffic

GHD have predicted traffic noise levels for the following four roads adjoining the site between 10 pm and 12 am (when the majority of patrons will be leaving). A summary of this assessment is outlined in **Table 21**. Noise levels are based on vehicles exiting the Members and Infield car park, as well as patrons leaving in a taxi/ Uber. The distribution of travel modes is based on the Traffic Impact Report prepared by PTC Consultants.

Table 21 Summary of noise emission from traffic

Road	Results	Compliance
High Street	<p>The worst-case impact scenario of vehicles exiting the infield car park on sensitive receivers along High Street (at 1m from the façade) is anticipated to result in the following noise emission:</p> <ul style="list-style-type: none"> <li>▪ 50 dBA between the racecourse exit and Anzac Parade</li> <li>▪ 51 dBA between the racecourse exit and Wansey Road</li> </ul>	<p>The results indicate the predicted noise emission at residential receivers along High Street will achieve compliance with the adopted project-specific noise criteria for road traffic noise.</p>
Doncaster Avenue	<p>The worst-case impact scenario of vehicles exiting the members car park on sensitive receivers along Doncaster Avenue (at 1m from the façade) is anticipated to result in the following noise emission:</p> <ul style="list-style-type: none"> <li>▪ 46 – 50 dBA to the north of Gate 18</li> <li>▪ 48 – 51 dBA to the south of Gate 18</li> </ul> <p>It has been assumed that no horse floats or vehicles will use this exit.</p>	<p>The results indicate the predicted noise emission at one receiver will marginally exceed the adopted project-specific noise criteria for road traffic noise. However, the noise emission will comply with all other receivers at Doncaster Avenue.</p> <p>Refer to mitigation measure in Table 22.</p>
Ascot Street	<p>The worst-case impact scenario of vehicles exiting the members car park on sensitive receivers along Ascot Street has been assessed.</p>	<p>The results indicate the predicted noise emission at residential receivers along High Street will achieve compliance with the adopted project-specific noise criteria for road traffic noise.</p>

Source: GHD

In summary, the noise emission from vehicles for a larger Class 2 event is anticipated to comply with all relevant road traffic noise criteria at sensitive receivers, with the exception of 1 receiver to the south of Gate 18 on Doncaster Avenue. It is likely that for Class 3 events, the noise impact from road traffic will be reduced. Refer to proposed mitigation measures below.

Traffic on all other roads is not expected to impact the residential receivers in the area due to high existing traffic volumes. GHD note that the impact from traffic exiting the site will be on an infrequent basis for a short duration following each event and as such do not consider the impact to be significant.

## 6.2.4. Mitigation Measures

Based on the Acoustic Assessment undertaken in preparation of this EIS, GHD have recommended the following mitigation measures be implemented for the proposed night racing events at Royal Randwick to manage acoustic impacts on surrounding sensitive receivers. These are also outlined in the Mitigation Measures table at **Appendix B**.

Table 22 Noise mitigation measures

Potential impact	Approach	Residual impact
Noise impact from generators required for additional lighting	<p>Generators should be selected to have a maximum sound power level of 100 dBA. In addition to this, they are required to be located the following distances away from sensitive receivers:</p> <ul style="list-style-type: none"> <li>▪ Receivers R01 to R07 – 170 metres</li> <li>▪ Receivers R08 to R21 – 110 metres</li> </ul> <p>These distances would need to be adjusted to a further distance should a generator with a higher sound power level be selected.</p> <p>Conversely, they may be adjusted to a closer location should they have a lower sound power level.</p>	Noise emission from generators will be sufficiently below the noise criteria and therefore they will not have a negative impact on the sensitive receivers.
Noise impact from patrons egressing on foot	<p>Patrons leaving the venue following the completion of the event should exit through the entry/exit gates on Alison Road. The exit to Ascot Street should be blocked for pedestrians after 8pm.</p> <p>Patrons exiting on Alison Street 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.</p> <p>Signage should be erected to inform patrons to leave in a quiet and orderly manner.</p>	There may be a residual noise impact from patrons exiting the site. Security and management will be important to ensure this impact is kept to a minimum.
Vehicles exiting member's car park using Ascot Street and Doncaster Avenue	<p>Clear signage should be displayed throughout the car park informing patrons to return to their vehicles and exit the car park in a quiet manner.</p> <p>Security should be located at Gate 18 to monitor the movement of traffic exiting the car park. Speed signs should be located throughout with a maximum speed of 10 km/h.</p>	N/A
Vehicles exiting infield car park using High Street	<p>Clear signage should be displayed throughout the car park informing patrons to return to their vehicles and exit the car park in a quiet manner.</p>	Although noise from vehicles exiting the infield car park will comply with the requirements of the

Potential impact	Approach	Residual impact
	Security should be located at 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.	Road Noise Policy, reasonable and feasible mitigation measures should be put in place to minimise the impacts.
Commentary and music from the public address system	<p>Noise emission from the public address system, including commentary and music, must cease prior to 10pm and not exceed the following maximum noise levels at any sensitive receiver:</p> <ul style="list-style-type: none"> <li>▪ LAmax 65dB</li> <li>▪ Lcmax 80dB</li> </ul> <p>It is recommended that noise monitoring be undertaken at various events throughout the year, including the first event, a Class 2 event and a Class 3 event. Noise levels of the public address must be reduced should the above maximum noise levels be exceeded.</p>	Potential exceedances to the noise criteria from crowd noise during major races. The short duration and characteristics of the crowd noise could be considered a low impact on the sensitive receivers as it does not contain annoying characteristics. Since large races only occur occasional and for a short time the impact on residential amenity is considered to be minor.
Amplified music from other sources (ie DJ's at the rear of the grandstand)	<p>Noise emission from the amplified music must cease prior to 10pm and not exceed the following maximum noise levels at any sensitive receiver:</p> <ul style="list-style-type: none"> <li>▪ LAmax 65 dB</li> <li>▪ LCmax 80 dB</li> </ul> <p>It is recommended that noise monitoring be undertaken at various events throughout the year, including the first event, a Class 2 event and a Class 3 event. Noise levels of amplified music must be reduced should the above maximum noise levels be exceeded.</p> <p>It is recommended that large post-event concerts should not be held as it is highly likely that the above maximum noise levels will be exceeded.</p>	
Noise management plan	A noise management plan has been prepared to address the SEARs	
Acoustic monitoring plan	An acoustic monitoring plan has been prepared to address the SEARs	

Source: GHD

## 6.2.5. Summary

In summary:

- GHD have undertaken an assessment of the predicted noise generation from the night-racing events at Royal Randwick.
- Noise from race commentary and music is predicted to comply with the adopted LA<sub>max</sub> and LC<sub>max</sub> criteria. Patrons and vehicles exiting the racecourse after the events have the potential to exceed the relevant criteria if not managed, and therefore a noise management plan has been developed to address these issues and provide mitigation measures to reduce the impact at the residences. The Noise Management Plan is provided at **Appendix H**.
- Noise impacts from patrons departing the site have the potential to cause sleep disturbance impacts when departing via Gate 18. Mitigation measures have been provided to reduce the impacts of this, including closing the exit to pedestrians and taxis/Ubers from 8pm and redirecting them via Gate 1.
- Noise impacts from vehicles on surrounding roads are predicted to comply with the relevant noise goals of the Road Noise Policy. However, mitigation measures have been provided to further reduce the impacts of this.

## 6.3. VISUAL AND LANDSCAPE

### 6.3.1. Overview

Sturt Noble Associates (**SNA**) were engaged to prepare a Visual and Landscape Impact Assessment in response to the proposed night racing events. In particular, the Visual and Landscape Impact Report (**Appendix I**) focuses on the visual and physical impacts associated with the infrastructure required to hold night racing events, namely the installation of tall light columns.

The report provides assessment in accordance with Item 3 of the SEAR's, specifically addressing impacts on existing trees and vegetation, visual impacts on the landscape character of the site, heritage and landscape significance, and visual impacts on significant views and vistas as a result of the proposed light columns.

### 6.3.2. Methodology

The Visual and Landscape Impact Report has been prepared using a methodology based on the Environmental Impact Assessment Practice Note: Guidelines for Landscape Character and Visual Impact Assessment (Roads and Maritime, "EIA No.4 Guidelines", March 2013). As such, the impact assessment was broken down into the following components:

- **Landscape Analysis:** to establish an understanding of the topography, vegetation, heritage, landscape features of the site and how it fits into its context physically and historically. This analysis was completed through a desktop study reviewing documents relevant to the site, site surveys and undertaking site visits.
- **The Design:** review of the proposed light column installations for the site.
- **Physical Impact Assessment:** of the proposed design on the existing site and vegetation. This includes identifying any significant or historic plantings within the site and any potential impacts on the canopies and root zones. This assessment was completed by locating the proposed design over the site survey and satellite imagery.
- **Landscape Character Assessment:** is used to determine the overall visual impacts of the proposed development on the areas character, sense of place and in particular the heritage and landscape significance. The methodology for this process is addressed in detail in **Section 1.2 of Appendix I**, and summarised below:
  - Identify and describe the sites landscape character zones, based on the desktop study, site survey and site visits.
  - Assess the landscape character zones sensitivity to absorb change with a written rationale to support the rating applied.

- Identify the proposed landscape changes to each zone. This will be established by reviewing the proposed design in each zone.
  - Assess the magnitude of change to each landscape character zone, looking at the scale, form and character of the proposed changes.
  - Provide an overall assessment of impact based on the sensitivity and magnitude of change to each landscape character zone. The combined assessment of the sensitivity and magnitude provides the rating for the landscape character zones.
- **Visual Impact Assessment:** determines the overall visual impacts of the proposed development on significant views and vistas. The methodology used for this process is detailed in **Section 1.2 of Appendix I**, and summarised below:
- Determine the extent of the area that the proposal will be visible from, illustrated by a visual envelope map that identifies the visual catchment. This will be determined by carrying out a review of the site survey, topography, satellite imagery, street views and site visits, and consider views from residences, workplaces, educational institutes and public places.
  - Identify and describe key viewpoints within the visual catchment considering different uses, public and private aspects and historically significant views. Photographs of key views were taken during site visits to illustrate existing views. The photographs were stitched together digitally to form a panoramic image that illustrates the existing view from each location.
  - Assess the visual sensitivity of each view and its ability to absorb change with rationale to support the rating applied.
  - Identify the proposed landscape changes to each view and represent them with a photomontage for each view. Photomontages have been prepared by creating a digital 3D model of the proposed design. Renders of this model were then taken in the same locations and at the same elevations as the photographs of the views then digitally superimposed into the panoramic image to create the photomontages of the proposed design.
  - Assess the magnitude of change to each view, looking at the scale, form, character and distance of the proposed changes.
  - Provide an overall assessment of impact based on the sensitivity and magnitude of change to each view. The combined assessment of the sensitivity and magnitude provides the rating for the visual impact as per the table below.

### 6.3.3. Assessment

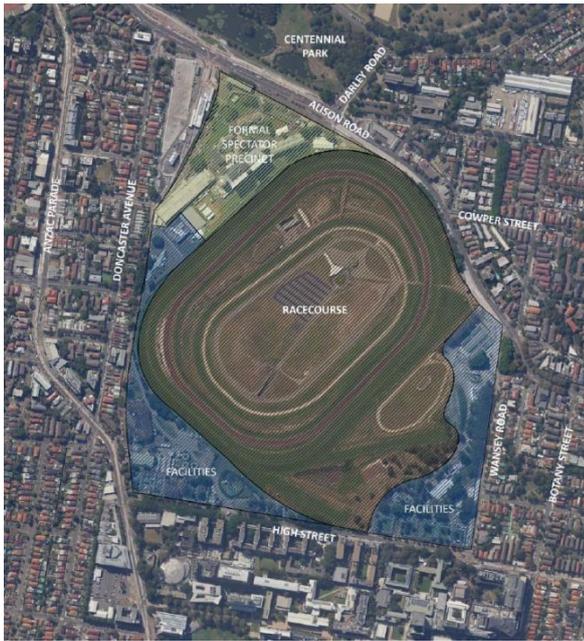
Below is a summary of the findings from the impact assessment in following the above methodology.

#### 6.3.3.1. Landscape analysis

Sturt Noble identified that the site is surrounded by a range of land uses including Centennial Park, residential areas, and tertiary Education facilities and accommodation. The topography of the site is predominantly flat, however there are steep grade changes along the eastern and southern boundaries of the site (Wansey Road and High Street).

The Landscape Analysis also acknowledges the heritage significance of the site and identifies the location of existing planting on the site, as shown in **Figure 29** Landscape analysis.

Figure 29 Landscape analysis



Picture 5 Surrounding context



Picture 6 Site analysis

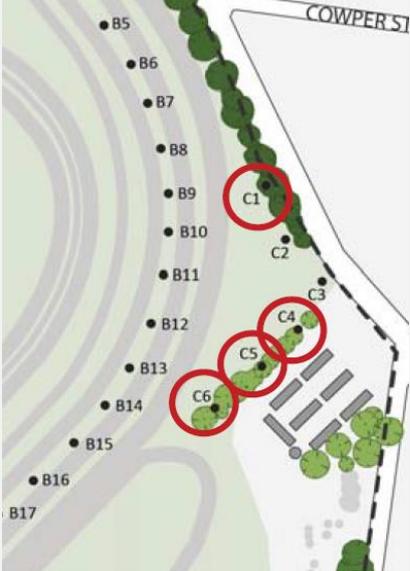
Source: SNA

### 6.3.3.2. Physical landscape impact assessment

SNA identified that the majority of the design will have no impact on the existing sites vegetation. However, the light columns are in close proximity to existing trees as shown in **Table 23**. The position of light columns may be adjusted slightly during the detailed design phase of the project.

Table 23 Physical Landscape Impact Assessment

Light Column	Impact Assessment	Location
Light Column A11 and A13	Damage to tree roots and incursion into their Tree Protection Zones (TPZ) due to the location of light column footings and cabling trenches. Under AS 970:2009 Protection of trees on development sites, an incursion of up to 10% of the area of the TPZ is considered acceptable, provided that there is no encroachment to the Structural Root Zone of the tree which in this case is unlikely.	
Light columns A6 to A9	The columns will be mounted to the roofline of the approved Winx Stand, which is currently under construction as of the time of preparing this report.	

Light Column	Impact Assessment	Location
<p>Light column C1, C4, C5 and C6</p>	<p>C1 is located in close proximity to existing exceptionally significant trees and potentially located within their TPZ and canopies. C4, C5 and C6 are located in close proximity to existing trees of high significance. Based on the Stables Precinct Development Impact Assessment Report, prepared by Earthscape Horticultural Services in September 2010, the columns are located within their TPZ and canopies. As part of the Stables Precinct Development works, the trees around C6 were approved for removal by the Department of Planning under MP07_0092 on 28 February 2008.</p> <p>Under AS 970:2009 Protection of trees on development sites, an incursion of up to 10% of the area of the TPZ is considered acceptable, provided that there is no encroachment to the Structural Root Zone of the tree which in this case is unlikely. As such, the final position of C1, C4 and C5 will re-reviewed at the detailed design stage and in consultation with an arborist.</p>	

Source: GHD

### 6.3.3.3. Landscape character assessment

Sturt Noble identified the Royal Randwick site is made up of three distinct character zones and assessed their sensitivity. The visual impact assessment for each zone is summarised below:

- **Character Zone 1: Racecourse and Central Open Spaces:** Based on the sensitivity of this character zone (high) and the magnitude of change (moderate) the overall probable landscape character impact is assessed as being High-Moderate.

Figure 30 Course Proper



Source: SNA

- **Character Zone 2: Formal Spectators Precinct:** Based on the sensitivity of this character zone (moderate) and the magnitude of change (moderate) the overall probable landscape character impact is assessed as being Moderate.

Figure 31 Queen Elizabeth II Grandstand



Source: SNA

- **Character Zone 3: Facilities Areas:** Based on the sensitivity of this character zone (low) and the magnitude of change (low) the overall probable landscape character impact is assessed as being Low.

Figure 32 Horse Walkers and facilities buildings



Source: SNA

#### 6.3.3.4. Visual impact assessment

Key viewpoints were selected for assessment by the project team for their representation of the following:

- Views that assess the impact of the proposal from a variety of directions and distances around the site and therefore provide a range of visual detail.
- The views seen by the largest numbers of the various users around the site, including; local residents, temporary residents in the university colleges, the general public, motorists, patrons and employees of the Racecourse.
- Significant heritage views.

The impact is assessed using the grading matrix shown in **Figure 33** below.

Figure 33 Impact Assessment Grading Matrix

		MAGNITUDE			
		High	Moderate	Low	Negligible
SENSITIVITY	High	High	High - Moderate	Moderate	Negligible
	Moderate	High - Moderate	Moderate	Moderate - Low	Negligible
	Low	Moderate	Moderate - Low	Low	Negligible
	Negligible	Negligible	Negligible	Negligible	Negligible

Source: SNA

A total of 9 viewpoints were selected, as shown in **Figure 34** and assessed in **Appendix I**

Figure 34 Visual envelope map and view points



Source: SNA

All images are extracted from **Appendix I** prepared by Sturt Noble.

Table 24 Visual Impact Assessment

**Viewpoint 1 – From the picnic area in Centennial Park, looking south**

Based on the sensitivity of this view (Low) and the magnitude of change (Low) the overall probable view is assessed as having an impact rating of Low.

Figure 35 Visual impact assessment: Viewpoint 1



Picture 7 View 1 - Existing



Picture 8 View 1 - Proposed

**Viewpoint 2 – From the footpath in front of 32 Alison Road, looking south west**

Based on the sensitivity of this view (Moderate-Low) and the magnitude of change (Moderate-Low) the overall probable view is assessed as having an impact rating of Moderate-Low.

Figure 36 Visual impact assessment: Viewpoint 2



Picture 9 View 2 - Existing



Picture 10 View 2 - Proposed

**Viewpoint 3 – From Cowper Street, looking west**

Based on the sensitivity of this view (Moderate) and the magnitude of change (Low) the overall probable view is assessed as having an impact rating of Moderate-Low.

Figure 37 Visual impact assessment: Viewpoint 3



Picture 11 View 3 - Existing



Picture 12 View 3 - Proposed

**Viewpoint 4 – From the elevated private terrace of 94 Alison Road, looking south west**

Based on the sensitivity of this view (Moderate) and the magnitude of change (Moderate-Low) the overall probable view is assessed as having an impact rating of Moderate.

Figure 38 Visual impact assessment: Viewpoint 4



Picture 13 View 4 - Existing



Picture 14 View 5 - Proposed

**Viewpoint 5 – From the picnic area in Centennial Park, looking south**

Based on the sensitivity of this view (Moderate) and the magnitude of change (Low) the overall probable view is assessed as having an impact rating of Moderate-Low.

Figure 39 Visual impact assessment: Viewpoint 5



Picture 15 View 5 - Existing



Picture 16 View 5 - Proposed

**Viewpoint 6 – From a level 7 unit in the UNSW College by Gate 2, looking north**

Based on the sensitivity of this view (Moderate) and the magnitude of change (Low) the overall probable view is assessed as having an impact rating of Moderate-Low.

Figure 40 Visual impact assessment: Viewpoint 6



Picture 17 View 6 - Existing



Picture 18 View 7 - Proposed

**Viewpoint 7 – From the picnic area in Centennial Park, looking south**

Based on the sensitivity of this view (Moderate) and the magnitude of change (Moderate) the overall probable view is assessed as having an impact rating of Moderate.

Figure 41 Visual impact assessment: Viewpoint 7



Picture 19 View 1 - Existing



Picture 20 View 1 - Proposed

**Viewpoint 8 – From a level 3 balcony of 150 Doncaster Avenue, looking east**

Based on the sensitivity of this view (Moderate) and the magnitude of change (Moderate) the overall probable view is assessed as having an impact rating of Moderate.

Figure 42 Visual impact assessment: Viewpoint 8



Picture 21 View 1 - Existing



Picture 22 View 1 - Proposed

**Viewpoint 9 – From the picnic area in Centennial Park, looking south**

Based on the sensitivity of this view (High) and the magnitude of change (Moderate) the overall probable view is assessed as having an impact rating of Moderate.

Figure 43 Visual impact assessment: Viewpoint 9



Picture 23 View 1 - Existing



Picture 24 View 1 - Proposed

**6.3.4. Mitigation Measures**

SNA have identified the following mitigation measures to reduce the visual and landscape impacts identified.

Table 25 Visual and landscape impact mitigation measures

Impact	Potential Impact	Approach	Residual Impact
Physical	Damage and pruning of existing tree roots	<p>Carry out an Arboricultural Impact Assessment to establish TPZ's for all trees in close proximity to proposed light columns. During the detailed design stage adjust light column locations to avoid TPZ's.</p> <p>If it is not possible to relocate light columns out of TPZ's adjust columns to avoid encroachment greater than 10% or engineer specialised footings to reduce incursion in conjunction with arborist advice. Apply for development consent to carry out any root pruning works required to trees listed as significant under</p>	<p>None</p> <p>Reduced</p>

<b>Impact</b>	<b>Potential Impact</b>	<b>Approach</b>	<b>Residual Impact</b>
		<p>the Randwick Register of Significant Trees.</p> <p>Works are to be carried out by a qualified Arborist.</p>	
Physical	Pruning to existing tree canopies	Refer to abovementioned approach.	None
Character/ Visual	Scale of columns next to the Old Grandstand	As part of the design process the columns around the Old Grandstand were reduced in height from 48-60m to 30-40m high.	Reduced visual impact
Character/ Visual	Vertical elements added to a visibly flat and horizontal landscape	As part of the design process all the columns were reduced in height. Use light coloured or galvanised columns and fittings to help blend into the existing landscape and sky.	Reduced visual impact
Visual	Change to the skyline	As part of the design process all the columns were reduced in height. Use light coloured or galvanised columns and fittings to help blend into the existing landscape and sky.	Reduced visual impact
Visual	Scale of the columns in the view	As part of the design process all the columns were reduced in height. Where columns are viewed from outside the site, allow existing trees to grow and fill out. Consider new tree planting to infill any large gaps in the existing tree canopy along Alison Road.	Reduced visual impact
Visual	Large number of columns visible.	Use light coloured or galvanised columns and fittings to help blend into the existing landscape and sky.	Reduced visual impact

Source: SNA

## 6.3.5. Summary

In summary:

- SNA have undertaken a visual and landscape assessment in response to the proposed night racing events. In particular, focusing on the visual and physical impacts associated with the installation of tall light columns.
- SNA have been a critical advisor in developing the proposal to reduce visual impact from the light columns, including informing the reduction in light columns, their materiality and positioning around sensitive items on site such as the heritage listed Old Grandstand and existing trees.
- Based on SNA's findings, it is considered that the best available mitigation measures have been incorporated into the design to reduce visual and landscape impacts. The proposal is acceptable for approval in relation to its visual and landscape impacts.

## 6.4. TRANSPORT AND ACCESSIBILITY

### 6.4.1. Overview

PTC were engaged to provide a transport and traffic assessment in accordance with Item 8 of the SEARs issued by DPE on 21 September 2017 and in accordance with advice issued on 7 April 2020. In response to the SEARs, PTC prepared a Traffic Impact Assessment (**Appendix J**) and a Pedestrian, Transport and Traffic Management Plan (**Appendix K**). The Traffic Impact Assessment (**TIA**) addresses all points within Item 8 of the SEARs, including but not limited to impacts on road users, parking provisions, public transport (existing and future), pedestrian access and cycle infrastructure. For clarity, the TIA provides a table (Table 1 of the PTC report) identifying which section of the report addresses each SEARs item.

In addition, the Pedestrian, Transport and Traffic Management Plan (**TMP**) has been prepared to inform the management of the night racing events at Royal Randwick. The TMP has been prepared with reference to the current TMP adopted by the ATC for existing racing and non-racing events held during the daytime.

### 6.4.2. Methodology and Findings

To understand current travel conditions in proximity to Royal Randwick during the periods proposed for night racing, PTC implemented the methodology outlined in the following subsections.

#### 6.4.2.1. Site Analysis

PTC conducted a desk top review of the existing road network, public transport, event bus services, Sydney Light Rail, and active transport options including pedestrian and cycle infrastructure. This was also reinforced with onsite observations.

#### 6.4.2.2. Traffic Surveys

PTC conducted a series of traffic surveys at key intersections surrounding RRR, to capture current local traffic volumes. The locations of the survey and details are shown in **Figure 44**.

The traffic survey was conducted on 17 October 2017. It is noted that during the time of the survey, construction activity associated with the Sydney Light Rail was undertaken. Revised surveys were not undertaken due to the impact of COVID-19 restrictions, which similarly affect the operation of the road network and CSELR. In response, PTC have increased the traffic volumes on the selected intersections by 1% each year (cumulative).

The survey was undertaken between 5pm – 7pm, as this was identified as the most critical period due to grouped arrival of traffic associated with night racing event will coincide with the evening commuter peak period. Identification of the 2017 survey data and the estimated 2020 traffic volumes are provided in the TIA. The 2020 traffic volumes have subsequently been used as a basis for the traffic assessment.

Figure 44 Traffic survey locations



Source: PTC

Table 26 List of surveyed intersections by PTC

#	Intersection Location	Intersection Type	Survey Times
1	Anzac Parade – Alison Road – Dacey Avenue	4-leg, Signalised	5:00pm-7:00pm
2	Alison Road – Doncaster Avenue	Signalised T-junction	5:00pm-7:00pm
3	Alison Road – Racecourse, Gate 1	Unsignalised T-Junction	5:00pm-7:00pm
4	Alison Road – Darley Road	Signalised T-junction	5:00pm-7:00pm
5	High Street – Gate 2 Avenue	4-leg, Signalised	5:00pm-7:00pm
6	Anzac Parade - High Street	Signalised T-junction	5:00pm-7:00pm
7	Anzac Parade – Doncaster Avenue	4-leg, Signalised	5:00pm-7:00pm
8	Doncaster Avenue – Ascot Street	4-leg Roundabout	5:00pm-7:00pm

Source: PTC

### 6.4.2.3. Private Vehicle Trips Survey

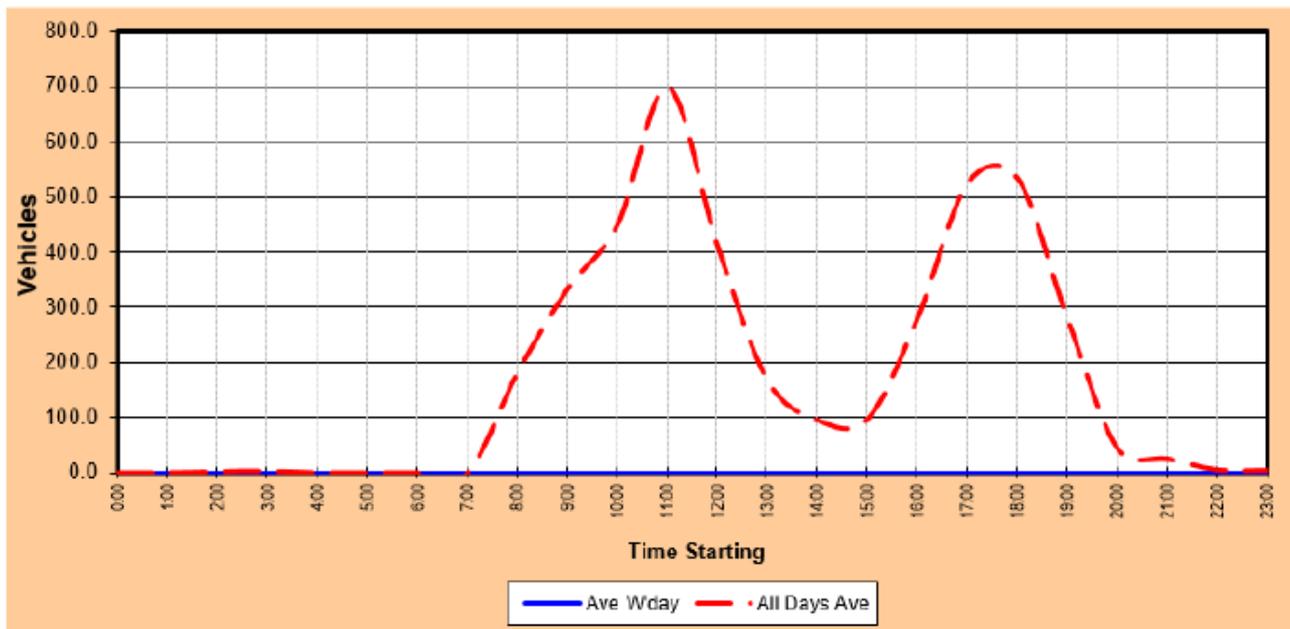
In addition to conducting a traffic survey of the existing road network, PTC also undertook a traffic count and car occupancy survey at the infield car park during The Everest event held on Saturday 14th October 2017, between 10am and 5pm. The first race began at 12pm.

This survey date was selected as The Everest was the largest annual race event held at Royal Randwick, and the attendance approaching 35,000 was representative of the anticipated highest attendance for any racing event\*. The proposed maximum of 15,000 patrons for night racing will therefore result in lower traffic impacts.

*\*The decision to measure capacity during a signature event such as The Everest was effectively to measure the absolute worst-case scenario. This data was also collected during a time of the original proposal accommodating night racing events up to 35,000 patrons. As indicated in this EIS, the number of patrons for night racing has been capped at 15,000 patrons as a key mitigation measure of this TIA.*

The private vehicle trips survey revealed the travel pattern shown below in **Figure 45**.

Figure 45 Infield traffic count survey at The Everest event (14<sup>th</sup> October 2017)



Source: PTC

In summary:

- Traffic patterns are largely tidal in flow, with a distinct arrival peak and a departure peak. The greatest volume of traffic reached 700 (615 arriving/85 exiting) vehicles over the hour leading up to the first race (11am-12pm), however this volume is not sustained for long, with each hour on either of peaking at around 400-450 vehicles, and continuing to decrease sharply.
- Car occupancy was approximately 2.0 people per vehicle on average. This is based on 500 samples.

In regard to trip distribution, 40% private vehicles (including 35% private cars and 5% hired cars) are estimated to be parked in Members car park and 60% private cars are estimated to be parked in infield car park. Trip distribution for hire vehicles is either via Ascot Street or Gate 1.

#### 6.4.2.4. Travel catchment

To understand the likely patron catchment area for the proposed night racing events, PTC utilised patron postcode data captured by ATC for each major racing event held at RRR over the last year.

The travel catchment in terms of the general direction of approach is as follows:

- North: 35%
- East (local): 15%
- South: 30%
- West: 20%

It is noted that a higher proportion of patrons will likely be travelling directly from work on week nights due to the timing of the night racing, and as such, employment hubs are likely to become more notable origins for patrons of the night racing. Notwithstanding, this general approach split remains appropriate.

#### 6.4.2.5. Travel Mode Share

In addition to capturing patron postcode data, the ATC also conducted travel mode share data through patron surveys conducted at racing events held during the 2017 Autumn racing season. The survey data comprises of 1,500 responses, which average between arrival mode and departure mode, which were noted as being similar to one another.

In addition, PTC conducted traffic counts and car occupancy surveys on 14 November 2017 to provide a more precise indication of travel mode share. Whilst the results of the survey were fairly consistent between the two methods, it is noted that private travel was more popular over the entire 2017 Autumn racing season (32%) than the Everest event (25%). PTC note this indicates smaller mid-week events typically attract additional private mode of transport due to the availability of car parking. However, private trips are anticipated to be lower for night racing events as there is potential for greater consumption of alcohol and the event is the 'final' of the day as opposed to a day event.

In light of the above, the modal share has been presented to reflect the private car share mode indicated in the traffic surveys (25%), with the difference being distributed amongst other modes that are likely to be more popular for a Class 2-night event scenario. Additional assumptions adopted by PTC are outlined in the TIA, and have been reflected in the projected mode share for night racing as outlined in **Table 27**.

Table 27 Projected mode share

Mode type	Private trips	Taxi / Car Share / Uber	Public transport	Shuttle/Charter bus/Coach	Hire Car	Walked
Mode share	25%	16%	43.5%	5.5%	5%	5%

Source: PTC

#### 6.4.2.6. Traffic Network Modelling

The traffic and intersection survey data were modelled with SIDRA Intersection 7.0 software, a micro-analytical tool for individual intersections and whole-network modelling.

Consultation with Randwick City Council has indicated that the existing Doncaster Avenue/ Ascot Street roundabout is to be upgraded to a stop-controlled intersection with vehicles on Ascot Street required to give priority to vehicles travelling on Doncaster Avenue. As construction is anticipated to be completed in 2021, the geometry has been adopted into the network modelling. No changes are proposed to the other surveyed intersections.

The intersections have been modelled for existing traffic, event 3 traffic and event 2 traffic. Event 3 traffic and event 2 traffic have been modelled with two (2) different scenarios as follows:

- Scenario 1 - In this scenario, all taxis / uber enter and exit via Ascot Street.
- Scenario 2 - In this scenario all taxis / uber enter and exit via Gate 1.

The modelling indicated for the existing network performance at each of the modelled intersections is detailed in **Appendix J**.

### 6.4.3. Traffic Impact Assessment

PTC provided an analysis of the SIDRA model results. In summary:

- During the critical peak hour of 5:00pm - 6:00pm in a worst-case event, some delays are expected in the road network. The additional traffic generated by the proposal will result in some extensions to delays at the following intersections:
  - Anzac Parade / Alison Road / Dacey Avenue intersection,
  - Alison Road / Doncaster Avenue intersection,
  - Anzac Parade / High Street intersection,
  - Anzac Parade / Doncaster Avenue intersection and
  - Doncaster Avenue / Ascot Street intersection.
- The current performance of the Doncaster Avenue/ Ascot Street intersection experiences congestion due to taxis queuing across the intersection during peak arrival time at the worst case events (35,000 people\*). It is expected that these conditions would similarly occur during the proposed night racing events, where arrivals will coincide with the evening commuter peak. However, a proposed reduced patron capacity to 15,000 and 10,000 patrons for night races (chosen as a mitigation measure) is expected to reduce the associated impacts of these events compared.
- From information provided by Randwick City Council, it is understood that existing Doncaster Avenue/ Ascot Street roundabout intersection is proposed to be modified into a stop-controlled intersection. PTC has analysed the likely impact of the Class 3 and Class 2 event on the upgraded priority intersection of Doncaster Avenue / Ascot Street, identifying the stop-controlled intersection would create worse delays and queues. This is particularly due to the high flow of vehicles along Ascot Street during events and the vehicles entering RRR from the western approach now being required to stop and give-way to all vehicles travelling along Doncaster Avenue as well as pedestrians and cyclists. Allowing the taxis/uber to enter and exit the Racecourse via Gate 1 (Scenario 2) improves the performance of the intersection significantly (Scenario 2 has been selected as a mitigation measure).
- Based on these results, PTC do not consider the upgrades for the signalisation of the Doncaster Avenue / Ascot Street intersection necessary. Under normal circumstances, the traffic flow along Ascot Street is less than 200 vehicles/ hour (outside of events) and does not meet the requirements for upgrades in the RTA *Traffic Signal Design – Section 2 Warrants Section 2.3 (a) Traffic demand*. Notwithstanding this, a number of mitigation measures are proposed to reduce or eliminate traffic impacts associated with the proposed night racing events. These are addressed in the Mitigation Measures table at **Appendix B**.

*\*35,000 patrons was measured during a signature event such as The Everest. As indicated in this EIS, the number of patrons for night racing has been capped at 15,000 patrons as a key mitigation measure of this TIA.*

### 6.4.4. Public Transport Assessment

During preparation of this application, consultation between ATC, Sydney Light Rail and STA has been ongoing to mitigate the impact of the proposal on public transport services. These transport agencies acknowledge Royal Randwick is an existing major event venue and the need to design and provide for large crowds on occasions.

Based on an anticipated maximum crowd of 15,000 patrons and taking the adopted public transport mode split of 43.5% (23.5% by light rail and 20% by public buses) amounts to 6,525 patrons travelling to and from the site via public transport. Based on the travel direction split discussed in **Section 6.4.2.4**, it is estimated that 75-85% of patrons using public transport will head towards Central.

Noting that additional light rail and bus services can accommodate approximately 11,000 additional people during events, this suggests that there is sufficient capacity to transport patrons between key origins (Bondi, Central) and the site. PTC note that it will be important to discuss with Sydney Trains the flow-on implications, as patrons filter out along the train network. PTC recommend that Sydney Trains should be represented within the MEOG for large events, if not already.

Refer to mitigation measures proposed to reduce or eliminate public transport impacts associated with the proposed night racing events. These are addressed in the Mitigation Measures table at **Appendix B**.

### 6.4.5. Pedestrian and Cyclist Assessment

Pedestrians and Cyclists, whether associated with the event or not, are likely to originate from the immediate locality, and be familiar with the locality. The locality provides well-lit footpaths around the site, along with signalised crossings along major junctions at state roads. No road closures are proposed for night racing events, and all footpaths and cycle paths will be maintained throughout the event. As such, no significant impacts to pedestrians in the locality are anticipated to result from night racing events.

Notwithstanding, during the lead-up to and wind-down of each event, vehicle and pedestrian movements in the area will increase, inherently increasing risks of conflict and delay to some extent.

### 6.4.6. Parking and Servicing Assessment

#### 6.4.6.1. Parking

Royal Randwick has a large supply of on-site and off-site parking, which will be utilised for the proposed night racing events. This is outlined in **Table 28**:

Table 28 Parking provisions

	<b>Members Car Park</b>	<b>Infield Car Park</b>	<b>On-site Total</b>	<b>Off-site Parking (Moore Park)</b>	<b>Combined Total</b>
Capacity (Spaces)	574	3,500	4,074	700	4,774

Source: PTC

The mode share surveys indicate a parking demand of 1,876 spaces during the proposed night racing events. The peak parking demand of 1,876 spaces will therefore be readily accommodated by the available parking provision on-site, being 4,074 spaces. Notwithstanding, an additional 700 off-site parking spaces will be available at Moore Park as a safety measure. It is also noted that the off-site parking at Moore Park is arranged under a cooperative agreement between the two event sites, through the MEOG, and will be made available for night racing events. The ATC provide a free return shuttle between Moore Park and Royal Randwick. This cooperation includes event timing, to ensure events do not overlap, creating cumulative impacts to Sydney’s road network.

As 3,500 parking spaces are accommodated within the Infield car park (informal car park) the capacity of the area is highly dependent on the arrangement of vehicles. To ensure the maximum amount of vehicles can be accommodated within the Infield, PTC have recommended a number of parking measures to be adopted by parking management staff. Refer to mitigation measures proposed as outlined in the Mitigation Measures table.

Accordingly, PTC consider that with appropriate promotion and management of on-site and off-site parking, local on-street parking impacts can be minimised.

#### 6.4.6.2. Drop-off provisions

The Racecourse will operate all drop-off facilities as it would for existing day-events. These facilities include:

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

## Bus Provisions

The Royal Randwick Bus rank accommodates 11 independent bus stops. According to NSW Bus Infrastructure Guidelines, 6 bus stops can accommodate between 120-180 buses per hour, based on a 30 second dwell time. In the case of Royal Randwick, each bus would require longer dwell times due to the larger intake of passengers. Notwithstanding, 11 bus stops is considered readily able to accommodate the additional 20 public bus serves (occurring over more than a single hour) with capacity to accommodate private coaches on demand.

## Taxi Rank

The taxi rank (also used for car share drop off) and on-site queuing is able to accommodate up to 48 vehicles at any one time, before queueing back onto Ascot Road. On-site observations during major events (30,000+) noted that this queue currently extends to the Doncaster Avenue and Ascot Street roundabout, creating notable congestion along the length of Doncaster Avenue. This impact is likely to occur during the proposed night events, to a similar extent as is currently observed.

## Limousine, Shuttle and Coach Drop-off

Shuttles are able to access the site via Gate 1 from Alison Road. However, as there is limited capacity, this is only permitted on prior arrangement.

Coaches may drop off via the bus layby off Alison Road.

Further, an area is set aside within the Infield car park to drop off patrons from Shuttles, Limousines and Coaches as required.

### **6.4.6.3. Horse Float Provisions**

No change in the demand of horse-floats are anticipated as part of this proposal. As such, float parking provision is proposed to remain as per the existing arrangement.

### **6.4.6.4. Service Vehicle Provisions**

No notable change in servicing demands are anticipated between day events and the proposed night racing events. As such, servicing facilities on-site are proposed to remain as per the existing arrangements.

## Mitigation Measures

### **6.4.7. Mitigation Measures**

#### **6.4.7.1. Road Management**

A number of mitigation measures are proposed to reduce or eliminate traffic impacts associated with the proposed night racing events. It is noted that some of the measures are already implemented by ATC for day-time race events and are therefore readily available for implementation. Other measures may be introduced as part of this proposal, and can also be adopted for general events. PTC identify that given the scale of these events, some of the following measures will require the cooperation of other stakeholders, such as STA and Sydney buses, and this must be coordinated through the MEOG.

In addition to the below, ATC will maintain a relevant Pedestrian, Transport Management Plan for Events, which may be adapted to each specific event, depending on their nature and scale.

Table 29 Road management mitigation measures

<b>Potential impact</b>	<b>Approach</b>
Increased traffic and transport demands	<ul style="list-style-type: none"><li>▪ Preparation of a Transport Management Plan for Night Events (<b>TMP</b>). This plan will provide a basic framework which may be adopted for event specific TMP's.</li><li>▪ Preparation of Traffic Control Plans (<b>TCP's</b>) to be submitted with each TMP prior to events.</li><li>▪ Regular consultation with the MEOG to coordinate events with other development or major events in the local area, thereby mitigating/preventing cumulative impacts to the Moore Park Precinct.</li></ul>

Potential impact	Approach
	<ul style="list-style-type: none"> <li>Provide notification to local residents prior to events, with details of the events, and contact details for enquiries.</li> <li>Promote Night Racing as public transport events and facilitate this with Travel Access Guide information available on appropriate websites.</li> </ul>
Worsened traffic conditions specifically along Doncaster Avenue	<ul style="list-style-type: none"> <li>Allowing the taxis / uber to enter and exit via Gate 1 to reduce the delays and queues at the Doncaster Avenue / Ascot Street intersection (modelling Scenario 2).</li> <li>Undertake a taxi management study to review alternative access arrangements and management measures to significantly reduce impacts along Doncaster Avenue.</li> <li>Provide point duty Police at the Doncaster Avenue /Ascot Street intersection, to release queued traffic when required as part of event management and discourage illegal driver behaviour.</li> </ul>
Private vehicle trip generation	<ul style="list-style-type: none"> <li>Establish event-specific sustainable travel plans in the lead up to events</li> <li>Stagger arrivals by promoting early-bird parking prior to 5:00pm. Incentives may include premium parking, discounts on drinks, food or future tickets, etc.</li> <li>Promote car-pooling, with Premium parking for vehicles with 3+ passengers;</li> <li>Integrate free public transport services with pre-purchased tickets;</li> <li>Seek to increase mode share of cyclists, providing improved on-site cyclist parking facilities, including bike-share facilities;</li> <li>Support increased shuttle services between hotels;</li> <li>Continued patron surveys, to track travel trends and identify barriers and opportunities in public and active travel access;</li> <li>Regularly update the website and wayfinding to incorporate changes in local travel infrastructure and timetables, and seek opportunities to promote them;</li> <li>Continue organising additional event bus services and light rails services, to be coordinated within the MEOG</li> </ul>

Source: PTC

### 6.4.7.2. Public Transport

Measures to mitigate impacts to public transport include:

- Notify Sydney Trains of upcoming events and arrange for necessary interfacing signage and management between light rail, bus and train interfacing.
- ATC staff to be positioned at the pedestrian crossing between Gate 1 and Alison Road. For Class 2 events, Police presence may also be required.
- Additional light rail staff management around light rail stations anticipated to receive significant increases in patrons.
- If required, temporary control devices around light rail stations may be installed, including queue cordons, advisory signage, etc.
- Close monitoring of key light rail stations during events, to understand their performance, and identify and take action on any issues.

### 6.4.7.3. Pedestrian and Cyclist

Measures to improve pedestrian accessibility and reduce impacts include:

- Maintain a comprehensive site wayfinding approach, including maps, signage, and staff guidance;

- As part of ATC's Event Operations Plan, the movement of pedestrians through and around the site will be monitored, to ensure that pedestrians are provided with safe passage to their respective destinations, and that residential streets are not adversely impacted.

## **6.5. EUROPEAN HERITAGE**

### **6.5.1. Overview**

Urbis were engaged to prepare a Heritage Impact Statement (**HIS**) which is attached at **Appendix L**. The HIS was undertaken to assess the potential impact of the proposed works on the heritage significance of the Racecourse Heritage Conservation Area (C13) and the Members Stand (I249).

### **6.5.2. Methodology**

The HIS provides a historical overview of the site since the establishment of the Australian Jockey Club (AJC) in 1842 and the opening of the Randwick Member's Stand in 1886. Analysis of this comprehensive site history, the statement of significance under the Draft Randwick Racecourse Conservation Management Plan and the heritage listing under the Randwick LEP 2012 has informed the heritage impact assessment for the proposed development.

The HIS provides an impact assessment of the proposal against the relevant statutory controls contained within the Randwick LEP 2012, Randwick DCP 2012, including those specifically relevant to the Racecourse under Part E3 of the DCP, and the draft Randwick Racecourse Conservation Management Plan.

### **6.5.3. Assessment**

An impact assessment has been conducted as part of the HIS in accordance with the following statutory guidelines:

- *Randwick LEP 2012;*
- *Randwick DCP 2013;*
- *Heritage Division Guidelines; and*
- *Draft Randwick Racecourse Conservation Management Plan 2006.*

The proposed works have been assessed to be appropriate within the context and setting of RRR and will have no physical or detrimental impact on the significant built, landscape or view components of the site. Specifically, there are no physical works to the significant built elements across the site.

Potential impacts to the existing built form involve disruptions to existing view corridors to and from the buildings. However, this change is considered minor in the context of other contemporary infrastructure and buildings and will complement the existing racecourse infrastructure.

The proposed lighting columns are minor in scale, and are a contemporary insertion into the landscape. They will not detract from the ability to view the heritage site in its entirety and the ability to interpret the history and use of the site.

### **6.5.4. Mitigation Measures**

Due to the negligible impact of the proposed development on the Racecourse Heritage Conservation Area and the Members Stand, there is no identified need for mitigation measures.

### **6.5.5. Summary**

The HIS prepared by Urbis assessed the appropriateness of the proposed night racing events and associated infrastructure on the Racecourse Heritage Conservation Area (C13) and the Members Stand (I249). The assessment concluded that the proposal will have no physical or detrimental impacts on the significant built, landscape or view components of RRR.

The HIS further concluded that due to the negligible impact of the proposal on the heritage value of the conservation area and Members Stand, no mitigation measures related to heritage impacts are required to be implemented.

## 6.6. ABORIGINAL HERITAGE

### 6.6.1. Overview

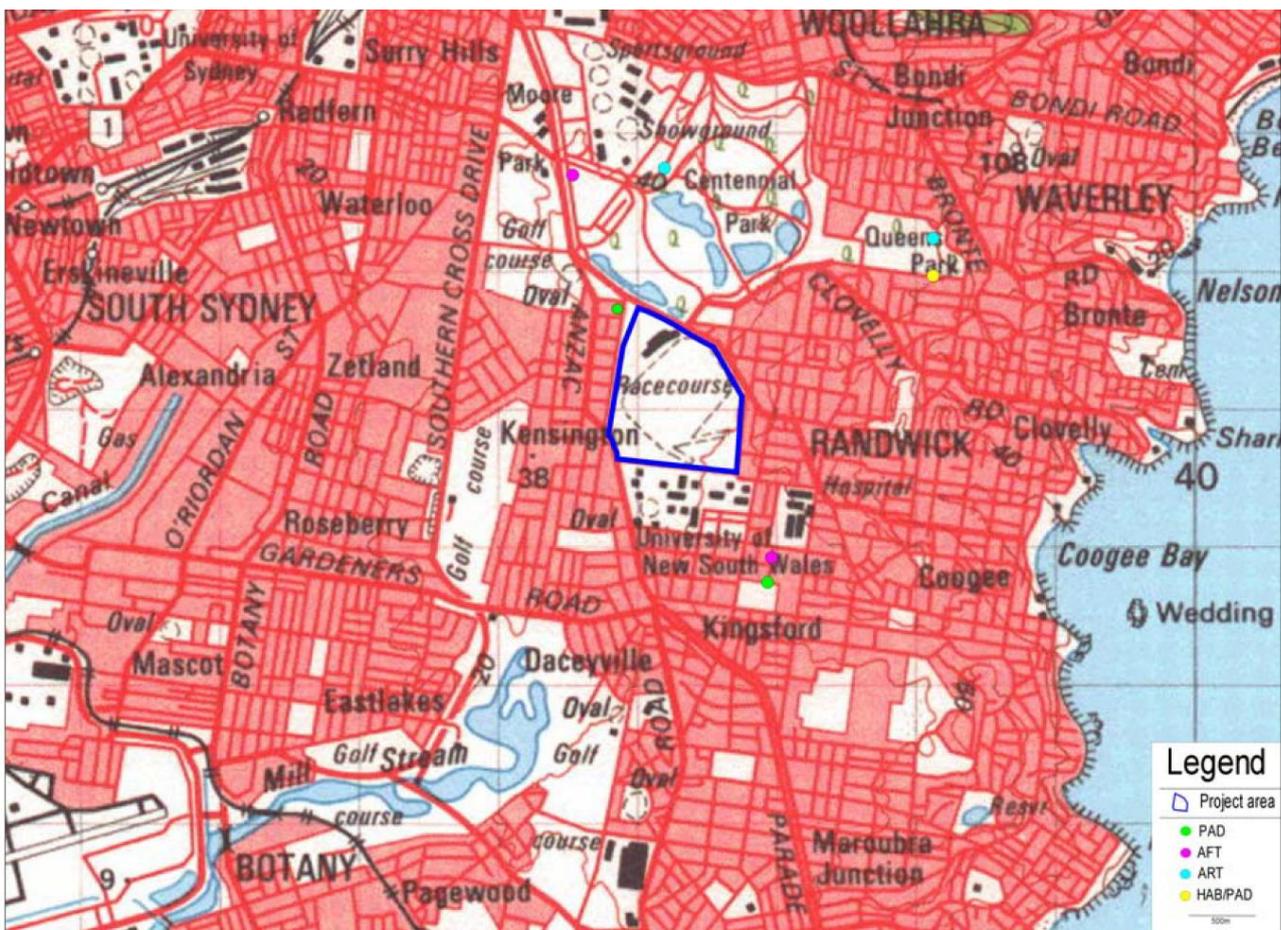
McCardle Cultural Heritage (MCH) were engaged prior to preparation of the project in 2017 to prepare an Archaeological Due Diligence Report, attached at **Appendix M**. The report provides an assessment of any Aboriginal objects and places discovered within and around RRR, illustrating that all reasonable and practical measures have been taken to prevent harm in response to the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* and the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.

### 6.6.2. Methodology

The methodology for the Aboriginal Heritage Due Diligence consisted of both primary and secondary research. An analysis of the Aboriginal Heritage Information Management System (AHIMS) demonstrates eight known Aboriginal sites are recorded within 3 kilometres of the subject site (**Figure 46**). However, closer examination of the search showed that two registered sites 45-6-2896(HAB/PAD) and 45-6-2897(PAD) were in fact the same site.

Based on their professional expertise, McCardle noted that the most commonly occurring Aboriginal remains were predicted to be artefact scatters and isolated artefacts manufactured from secrete or tuff. The register results and general archaeological site spatial patterns has informed a predictive model of the subject site in relation to landforms and proximity to water.

Figure 46 OEH AHIMS register of known sites



Source: MCH

On 18 October 2017, an archaeological survey was undertaken of the subject site by McCardle Heritage. This visual survey focused on areas of high ground surface visibility and exposures. Visibility was moderate due to race track grass cover and concrete walkways. However, this level of visibility and the nature of the inspection is considered satisfactory to provide an effective assessment.

### 6.6.3. Assessment

The comprehensive research and visual assessment of the site confirms the subject site has been subject to previous long term intensive land uses, including complete clearing and removal of all original landforms, fill imported for the construction the racecourse and grandstands and maintenance activities. The report confirms, *“there is very limited to no potential for cultural materials to be present within the project area”*.

It is considered the cumulative impact to Aboriginal heritage is marginal as follows:

- The proposed development footprint is small and does not affect an original landform.
- The subject site is highly disturbed due to previous land uses, resulting in the removal of all original landforms and cultural materials.
- No potential archaeological deposits or archaeological sites were identified.
- The placement of the development on the site ensures the impacts are focused to areas of lower to no potential.

### 6.6.4. Mitigation Measures

In order to maintain an awareness of the potential archaeology on the site, all employees will be educated of the statutory legislation protecting places of significance and all works will cease if Aboriginal objects are uncovered during works. If a known Archaeological site is affected as a result of the proposed works, an Aboriginal Heritage Impact Permit (**AHIP**) will be required. Aboriginal consultation will occur in accordance with the Aboriginal Consultation Requirements for Proponents 2010 if an AHIP is required.

### 6.6.5. Summary

The Aboriginal Heritage Due Diligence Report provides a comprehensive assessment of the Aboriginal Archaeological context of the subject site and the level of impact of the proposed development. Analysis consisted of primary and secondary research sources, which indicated all landforms and cultural material had been removed from the site due to extensive development and maintenance activities, and as such the proposal will have no impact on the site's Archaeological potential and Aboriginal significance.

## 6.7. ESD

### 6.7.1. Overview

The Lighting Impact Assessment prepared by IGS (**Appendix E**) outlines the proposed measures to improve the environmental performance of the construction and ongoing operation of the proposed development. The principles of ecological sustainable development (ESD) aims to use, conserve and enhance community resources so that quality of life can be maintained into the future. The proposal responds to these principles and implements a sustainability framework embedded into the design and operation of the night racing event.

### 6.7.2. Mitigation Measures

Measures to mitigate the impact of the environmental impact of the track and precinct lighting design are as follows:

- Luminaire lighting with LED lamps will be utilised along the racetrack and within the precinct, a lighting method known for its energy efficiency and lifespan compared to metal halide lamps. The lights will only be operating during race periods, and will be dimmed in between to reduce any obtrusive lighting on the surrounding area and to reduce energy use. These strategies align with ESD principles and ensures the energy resources are only utilised when necessary.
- The use of diesel generators throughout the course will supply the track lighting and supplement the existing electrical infrastructure onsite. 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, diesel generators throughout the site will reduce the amount of additional cabling required from the existing switchboard.

- The lighting materials proposed are ecologically sustainable. Copper will be utilised for all electricity cabling and steel lighting poles, which can both be recycled following the infrastructure reaching the end of its life cycle.

Implementation of these measures will improve the energy efficiency and sustainability of the proposal at both construction and operation phases of the development.

### 6.7.3. Summary

Based on the proposed lighting design implementing the industry best practice in terms of LED lighting technology and the capability to easily control lighting levels to minimise energy consumption, it is considered that the proposed development achieves the best possible environmentally sustainable development objectives and is acceptable for approval in relation to ESD.

## 6.8. SERVICING AND WASTE

The management of waste generated from race day events at RRR has occurred under the existing Event Operational Management Plan (**EOMP**) prepared by the ATC and approved under previous SSDA's. The proposed development will not result in an increase in patronage numbers during race days or non-race days. Therefore, waste management will continue to be undertaken in accordance with the existing operation waste management procedures. At a high level, waste storage, recycling and disposal of waste generated by night racing will coincide with existing procedures, including:

- Waste collections scheduled for each event.
- Neither waste or recyclables are compacted.
- Collection contractors will be appointed to collect waste at the event. Contracted cleaners or facilities management will be reasonable for arranging the transfer of waste and recyclables during or following events.
- Under MP10\_0097, waste management operations can occur 24 hours a day and in accordance with the Waste Management Plan and Operational Noise Management Plan.

The existing EOMP has been revised to a draft EOMP for Night Racing, noting some elements of managing the site will differ from daytime events. The revised draft EOMP is provided in **Appendix N**.

## 6.9. CPTED, SAFETY, SECURITY AND EMERGENCY MANAGEMENT

### 6.9.1. Overview

Sheridan Consulting Group (**SCG**) were engaged to develop a Security Management Plan (**SMP**) and Emergency Management Plan (**EMP**) (**Appendix P**) for the proposed night racing events. The SMP addresses physical security, security planning, threat and risk vulnerability assessment, hostile vehicle management, staff training and response to critical and emergency incidents. This report was prepared in respect of Item 9 and 11 of the SEAR's issued by DPIE on 21 September 2017, and also addresses the safety and security element of Item 5.

The SMP also includes a Crime Prevention through Environmental Design (**CPTED**) assessment as required by the Plans and Document item of the SEAR's.

### 6.9.2. Methodology

The preparation of the SMP included a review and assessment of the following components:

- **Security Review**
  - Review of existing security levels and security workforce undertaken in accordance with the Australian/New Zealand Standard – Risk Management – Principles and Guidelines (AS/NZS ISO 31000:2009) and the companion document Risk Management Handbook (HB 436:2004)
  - Level of training required to address the night racing requirements.
  - Adequacy and development of security procedures for night racing.
  - Recommendations for improvement of security management measures and plans for night racing.

- **Emergency Management Plan Review**
  - Adequacy and development of procedures for night racing.
  - Identification of additional emergency procedures to address night racing emergency incidents.
  - Assess Emergency Evacuation Plan in the context of night racing and identify additional requirements.
- **Terrorism Vulnerability Assessment**
  - Identify vulnerable areas and likelihood of threat.
  - Recommend mitigation actions to minimise threat.
- **Target Hardening Assessment**
  - Prepare a target hardening strategy.
- **CPTED Evaluation**
  - Risk assessment analysing crime statistics of the local area and assessing the design, usage and other aspects of the proposed development or study area.
  - Recommendations for crime prevention.
- **Covid safe management**
  - Identify measures to be implemented in response to the Covid-19 pandemic until such time a vaccine is available and infection transmission is reduced/ eliminated to a level acceptable to NSW Public Health.

### 6.9.3. Assessment

The SMP prepared by SCG concluded the following from its assessment:

- **Security review**
  - The existing Access Control Management currently utilises ATC Staff and contractors to maintain security, control visitors on site and control pedestrian access and egress of the site. The security staffing will require training for Night Racing operations.
  - Close monitoring of CCTV is utilised to control anti-social behaviour.
  - Security screening is conducted at the main entrance by security personnel and throughout RRR.
  - Perimeter fencing is a critical security measure in maintaining access control and management of the site. The perimeter is considered more vulnerable at night due to poorer visibility, thereby providing greater opportunity for undetected and unauthorised entry.
  - Security lighting needs to be considered for key patron populated areas, including the main entry (Gate 1), infield carpark area, ingress and egress route for internal pathways and routes through the site, evacuation points and assembly areas in the event of an emergency evacuation incident, surveillance camera locations that have poor visibility due to poor/no lighting.
  - The racecourse utilises user pay Police support commensurate to Risk profile for events.
  - Light Rail security has also been assessed due to the site's proximity to the Light Rail and it being a recommended form of arriving and leaving night racing events. The existing Light Rail stop has hostile vehicle barriers, CCTV coverage, good lighting and TfNSW/ Light Rail coordinates and manages light rail ingress and egress at Alison Road and onto the Light Rail, taking into consideration public transport limited capacity conditions during the Covid pandemic and ongoing.
  - Previous RRR Strategic Security reviews have recommended strengthening of security management practices to improve the access control arrangements for staff and visitors to the racecourse.
  - Implementation of strong access control management practices throughout RRR is required to manage, monitor and record all staff and visitors that attend the racecourse.

- **Emergency Management Plan Review**

- An Event Operational Plan of Management exists for RRR, including emergency evacuation measures. An Emergency Evacuation Plan is required to be prepared in the context of night racing.

- **Terrorism Vulnerability Assessment**

- A primary consideration is for hostile vehicle management. Recommendations for hostile vehicle management were provided by SCG in September 2017 in regards to racing and non-racing events.
- Further assessment is to be conducted on main patron ingress and egress at the Alison Road Gate 1 in relation to night racing.
- Certain hostile vehicle management devices including barriers, bollards, visual deterrent street furniture are to be implemented as a ring of defences for pedestrian safety of visitors.
- SCG identifies that the recommended bollards for Gate 1 have been installed.
- Temporary measures are installed for specific events with over 30,000 visitors.

- **Covid Safe management**

- Current Covid Safe protocols are utilised including managing visitor movement, physical distancing, entry and exit points and capacity limits.
- Additional ingress processes will continue to be conducted post Covid-19 until such time a vaccine is available, including identification and contact tracing process and other Government recommended Covid procedures prior to entry being granted.
- During the current Covid-19 environment, public transportation services are operating at a reduced capacity to maintain physical distancing across the network and therefore patrons are being advised to allow for additional travel time and plan ahead by checking real-time capacity indicators.
- Covid Marshalls are to be deployed within RRR and Alison Road/Light Rail stop precinct to manage physical distancing and crowd movement.
- The Emergency Assembly Area (Doncaster Lawn) will need to cater for physical distancing of crowd numbers until Covid Safe protocols are no longer required.

Based on the above, the proposed is considered acceptable for approval in relation to safety and security, dependent on the implementation of appropriate mitigation measures and conditions of consent.

#### **6.9.4. Mitigation Measures**

The Security Management Plan recommended a number of mitigation measures to augment existing security measures in response to the proposed night racing, and to address the existing vulnerabilities and risks identified in the assessment.

Specific mitigation measures have been developed in accordance with the following themes:

- access control - management practices to manage, monitor and record all staff and visitors that attend the racecourse.
- security screening.
- risk assessments specific to each event.
- security staff training appropriate numbers and training required to meet the needs of night racing.
- improvements/ additions to security lighting.
- perimeter security- repairs to vulnerable locations.

All recommended mitigation measures are described in **Table 30**.

Table 30 Safety and security mitigation measures

Potential Impact	Approach	Residual Impact
<b><u>Access Control</u></b>		
<p>Unauthorised patrons entering the racecourse with potential to commit a security breach.</p> <p>Unauthorised vehicles entering the course with potential to commit a security breach.</p>	<p><i>Management Measure</i></p> <p>A Security Management plan will be developed and Implemented.</p> <p>A Risk Management plan will be developed and implemented.</p> <p><i>Mitigation Measure</i></p> <p>Implementation of an electronic access control management system throughout Royal Randwick to manage, monitor and record all staff and visitors who attend the racecourse.</p> <p>Access point to the racecourse to be limited to Alison Road Main Gate 1 and the busway at Gate A and B.</p> <p>Private Security to be strategically deployed for ingress/ egress monitoring and management.</p> <p>Utilisation of NSW Police commensurate to Risk Management Plan for each Night Racing event.</p> <p>Deployment of security to manage the immediate vicinity of Royal Randwick during egress.</p>	<p>Strong access control measures in place to minimise the potential for unauthorised patrons and/ or vehicles to enter the racecourse area</p>
<b><u>Security and screening</u></b>		
<p>Increase in security vulnerability with potential security breaches compromising patron safety.</p> <p>Increase in undetected contraband entering event area.</p>	<p><i>Management Measure</i></p> <p>A Security Management Plan will be developed and implemented.</p> <p>A Risk Management plan will be developed and implemented.</p> <p><i>Mitigation Measure</i></p> <p>Strong private security presence at the main entrance. Gate 1 Alison Road and the busway at Gate A and B.</p> <p>Security operatives to conduct bag searches and personal screening of patrons during egress.</p> <p>Security operatives to complete warranted identification checks during ingress.</p>	<p>Strong security screening measures to eliminate the potential for contraband to be taken into the racecourse area.</p>

<b><u>Intoxication</u></b>		
<p>Heavily intoxicated patrons resulting in antisocial behaviour and potential assaults.</p> <p>Patrons unable to follow instruction and disregarding directions on egress and emergency evacuation.</p> <p>Patron egress lengthy with increased noise level.</p>	<p><i>Management Measure</i></p> <p>A Security Management Plan will be developed and implemented.</p> <p>An Alcohol Management Plan will be developed and implemented.</p> <p><i>Mitigation Measure</i></p> <p>Private contracted security to have an increased number of specially trained RSA officers at the main entrance on ingress and in the bar areas of the racecourse.</p> <p>Private Security and NSW Police to proactively observe intoxicated behaviour of patrons. Staff to be aware and report immediately to security unacceptable behaviour / intoxicated patrons.</p> <p>Utilisation of the large CCTV network to identify and react rapidly to intoxicated patrons.</p> <p>Security staff to have heightened awareness of non compliance by patrons in an emergency evacuation and act according to security procedures.</p>	<p>Early detection and strong management of intoxicated persons and resulting antisocial behaviour, reducing the likelihood of alcohol related incidents.</p>
<b><u>Security Resources</u></b>		
<p>Ineffective deployment of security operatives resulting in undetected security breaches.</p> <p>Ineffective management of ingress, egress and circulation.</p> <p>Ineffective management of intoxicated persons and potential assaults.</p> <p>Ineffective response to and management of patrons in an emergency evacuation.</p>	<p><i>Management Measure</i></p> <p>A Security Management Plan will be developed and implemented.</p> <p>An Emergency Management Plan will be developed and implemented.</p> <p>A Crowd Management Plan will be developed and implemented.</p> <p><i>Mitigation Measure</i></p> <p>A risk assessment to be completed on each night racing event prior to the event.</p> <p>Each private security operative to be well educated on their role and responsibility in respect to security management and emergency management at the racecourse.</p>	<p>Security Management deployment will be based on a risk management assessment of each event providing appropriate numbers and locations to effectively provide and manage security at the event.</p>
<b><u>Terrorist Attack</u></b>		
<p>Hostile vehicle entering the racecourse area intent on causing death</p>	<p><i>Management Measure</i></p> <p>A Security Management Plan will be developed and implemented.</p>	<p>Increased knowledge of staff</p>

<p>and/or major injury to patrons.</p> <p>Active Armed offender entering racecourse area intent on causing death and/or major injury to patrons.</p> <p>Offender carrying or planting an EID device intent on causing death and/or major injury to patrons.</p>	<p>A training plan for staff covering preparedness and response to an Active Armed Offender Attack in the current threat environment.</p> <p>Implementation of specific procedures in relation to active armed offender, IED's, hostile vehicle attack and dynamic lockdown.</p> <p><i>Mitigation Measure</i></p> <p>Hostile vehicle vulnerability assessment and target hardening strategy resulting in implementation of vehicle security barriers and visual deterrent barriers.</p> <p>Regular staff exercises and drills to be conducted on terrorist attack scenarios to assist staff in understanding their response and role in an attack.</p>	<p>in how to respond to an attack.</p> <p>Increased security measures in response to a hostile vehicle attack within the racecourse area.</p>
<p><b><u>Lighting</u></b></p>		
<p>Lack of lighting in high patron traffic areas entrances and pedestrian routes resulting in patron injury.</p> <p>Insufficient lighting around event area resulting in undetected security breaches.</p> <p>Insufficient lighting in Emergency Evacuation assembly areas resulting in patron confusion and injury.</p>	<p><i>Management Measure</i></p> <p>A lighting plan will be developed and implemented.</p> <p><i>Mitigation measures</i></p> <p>Identify and/or assess lighting requirements in the heavy pedestrian traffic areas.</p> <p>Identify security lighting needs to ensure no opportunities for crime in dark areas to exist.</p> <p>Assess the lighting and upgrade if necessary the emergency evacuation area at Doncaster Lawn.</p>	<p>Minimisation of areas vulnerable to crime in dark.</p> <p>Minimisation of patron injury through good lighting along main pedestrian routes and areas within the racecourse and surrounding area.</p>
<p><b><u>Perimeter Security</u></b></p>		
<p>Impact on event security through fence and gate breached due to vulnerable locations along fence lines and damaged fence.</p> <p>Impact on event security through unauthorized persons using climbable gates to gain access to the racecourse.</p>	<p><i>Management Measure</i></p> <p>A risk management plan will be developed and implemented.</p> <p>A lighting plan will be developed and implemented.</p> <p><i>Mitigation Measure</i></p> <p>Rectification work to damaged fence line.</p> <p>Strong lighting at vulnerable fence lined areas.</p> <p>Regular security patrols along fence line.</p>	<p>Strong perimeter fencing minimising the potential for unauthorised and undetected entry.</p>

	<p>Deployment of CCTV monitored and viewed in the Security Control Room.</p> <p>Implementation of non-climbable fences.</p>	
<b><u>Staff Training</u></b>		
<p>Impact to staff and patron safety if safety and response training is insufficient.</p> <p>Impact to staff and patron safety if emergency response and emergency evacuation is not trained and exercised in a regular basis.</p>	<p><i>Management Measure</i></p> <p>A Security Management Plan will be implemented and developed.</p> <p>A training plan for staff covering security procedures, safety procedures and emergency procedures including emergency evacuation.</p> <p>Implementation of specific procedures in relation to emergency management and response.</p> <p><i>Mitigation measures</i></p> <p>Regular staff exercises and drills to be conducted on Emergency Management and evacuation to assist staff in understanding their response and role in an emergency incident.</p>	<p>Well trained and knowledgeable staff on emergency and evacuation procedures with a clear understanding of their role and responsibilities minimising the potential impacts to staff and patrons.</p>
<b><u>Covid-19 Transmission Control</u></b>		
<p>Impact to staff, patron and community health and safety in the event of a COVID-19 outbreak resulting in large-scale infection transmission</p>	<p><i>Management Measure</i></p> <p>Implementation of a COVID Safe Plan for Royal Randwick.</p> <p>A training plan for staff covering COVIDSafe protocols, procedures and reporting consistent with NSW Public Health guidelines</p> <p>A comprehensive communications framework in place to advise patrons of COVIDSafe protocols and conditions of entry.</p> <p><i>Mitigation measures</i></p> <p>Medical services onsite with rapid response plan in the event a patron becomes unwell.</p> <p>Additional Security resources to perform COVID Safe protocols effectively.</p> <p>Implementation of trained COVID Marshalls to monitor and manage COVID safe practices such as physical distancing, contact tracing registration, minimal crowd movement etc.</p>	<p>Strong infection control measures in place to minimise the potential for transmission on a large scale.</p>

Source: SCG

## 6.9.5. Summary

The key risk and impacts arising from the proposed night racing are access control, crowd management particularly on egress, security screening and security lighting of the precinct. The security management plan provides a number of recommend mitigation measures to augment existing process and to address the identified vulnerabilities. With these mitigation measures incorporated, the level of impact arising from the proposed night racing in relation to security is considered to be appropriate and the proposal is acceptable for approval in consideration of safety and security.

## 6.10. ECONOMIC IMPACTS IN THE LOCALITY

RRR directly employs approximately 100 permanent employees and fluctuates to approximately 1,500 temporary staff, across a variety of business, commercial and industrial sectors related to horse racing, and creates many more indirect jobs.

Night racing events will sustain these existing jobs and likely create more employment opportunities in hospitality and retail on site and the surrounding area. In addition, night racing is likely to create a new window of activity in the area, meaning an increased opportunity for retail and restaurants in the locality.

Bellringer Group and Place Narrative and Research were engaged by ATC to undertake a review of the potential social and economic benefits of the proposed night racing events. The Australian Turf Club Night Racing Opportunities for Enhancing Randwick and Sydney report (the Opportunities Report) forms part of this EIS and is included in **Appendix Q**.

The Opportunities Report notes that research undertaken by IER on behalf of the Office of Liquor, Gaming and Racing indicated that patrons of Thoroughbred Race Meetings spend on average \$232 per person on a race day. However, as the proposed events relate to night time racing, there is an anticipated 10% expenditure uplift, amounting to a race day spend of \$255 per patron.

The Opportunities Report identifies that this spend is not wholly at the racing event, but rather for every dollar in on track expenditure, there is anticipated to be a further \$1.50 spent within the community. This expenditure is largely for accommodation, meals and entertainment, transport and retail. The economic benefits will be within the local community and surrounding businesses, as well as the Sydney CBD where tourism activities and accommodation are located for before and after event activities.

### Example of recent investment in night racing in QLD

As addressed in this EIS, night racing events have grown in popularity as it fits changing interests in recreation and lifestyle, and provides a new spectacle for patrons. This has positive effects in boosting contributions towards the tourism and leisure industry and will assist NSW in its recovery from the Covid pandemic.

This economic benefit has recently been demonstrated in QLD, with the recent development approval to transform the Gold Coast Turf Club (**GCTC**) venue into an international night racing venue. This \$38 million transformation was significantly supported by the QLD State Government through a \$31.5 million grant to redevelop the venue. This investment was part of the Government's COVID-19 economic recovery plan to "create jobs for local construction workers and rebuild the economy on the Gold coast".

Figure 47 Example of recent investment in night racing in QLD



Source: GCTC

In a similar outcome to the approved night racing at GCTC, it is envisaged that the introduction of night racing at RRR will further utilise the existing assets on site, continue to attract new interest in horse racing, present opportunities for boosting entertainment and tourism in Sydney and ensure that horse racing remains at RRR for the foreseeable future.

Accordingly, the proposed night racing will provide positive economic and employment benefits, creating local construction jobs and stimulating economic activity at RRR as well as the surrounding local and citywide economy, all of which are significantly valuable in contributing to NSW's recovery from the Covid pandemic.

## **6.11. SUITABILITY OF THE SITE**

RRR benefits from its existing profile as NSW's premier thoroughbred horse racing venue. The site is already used for large scale thoroughbred racing events and the proposed works to install light columns to facilitate night racing, are generally minor works with minimal disturbance to the site.

RRR benefits close proximity to Sydney CBD and existing public transport and is located within a major open space, recreation and entertainment precinct that includes Moore Park Golf Course, the Moore Park Sport Precinct (including Sydney Cricket Ground and Allianz Stadium), the Entertainment Quarter and Centennial Park.

There are no known site conditions which would prevent the development. Where there are environmental impacts, these can be suitably managed through mitigation measures and design outcomes.

The impacts on surroundings during construction will be not significant and will be managed during operation through the Event Operational Management Plan (modified for night racing events), which has been successfully implemented by the proponent for day time racing events.

The site is therefore considered suitable for the proposed development.

## **6.12. PUBLIC INTEREST**

The impacts of the proposed development have been evaluated within this EIS. This assessment finds that the impacts of the proposed development will provide significant benefits to the public. Any adverse impacts have been mitigated with measures already incorporated into the design of the proposal.

The benefits of the proposed development include:

- Provide new amenity through alternative night time activities
- Support continued direct and indirect employment opportunities for the local community.
- Opportunities to grow employment opportunities on site and in the surrounding area associated with new night time activities.
- Support NSW's economic recovery from the Covid pandemic.
- Continue to strengthen RRR as a significant tourism and leisure venue, which contributes (direct and indirect) over \$1.88 billion per annum to the NSW economy.

It can be concluded that on balance, the benefits of the development outweigh any adverse impacts and as such, the development is in the public interest.

## 7. EVALUATION OF THE PROJECT

The proposed development has been assessed with regard to the matters for consideration under section 4.15 of the EP&A Act and the SEARs issued by the Secretary of DPIE. We conclude that the proposed development can be supported for the following reasons:

- The land is zoned RE1 – Public Recreation under the RLEP 2012. The proposed development (being a major recreational facility) is permissible with consent and consistent with the land uses objectives of the RE1 zoning.
- There are no significant environmental constraints limiting the proposal.
- The proposal is consistent with the established use of the site as a thoroughbred racing venue and will not impact on the approved uses on the site, or increase its maximum patron capacity for race day events.
- The proposed development has been managed in size to reduce traffic impacts and can be managed through the Traffic Management Plan and Events Operational Management Plan for the site.
- The proposal has been prepared having regard to Council's planning policies and generally complies with the aims and objectives of the controls for the site.
- RRR benefits from its existing profile as NSW's premier thoroughbred horse racing venue, close proximity to Sydney CBD and existing public transport.
- Potential environmental impacts including light spill, visual impact, acoustic impacts as identified in this EIS have been assessed and appropriate mitigation measures have been incorporated at the design stage, or can be managed in the provided Events Operational Management Plan.

The proposal is in the public interest for the following reasons:

- The proposal for night racing at RRR has been in planning for a long time. Night racing at RRR will enhance the spectator experience and secure RRR's long term future as the 'jewel in the crown' of Sydney racing. This will strengthen the ATC's position and ongoing operation of the racecourse into the future.
- Night racing is becoming a popular tourism attraction in Australia and internationally. It also fits with changing expectations on entertainment, recreation and lifestyle in Australia and providing new opportunities to enhance Sydney's night time economy.
- Night racing at RRR is important for NSW to remain competitive with national and international thoroughbred racing venues and continue to contribute to NSW's economy.
- The site is well serviced by public transport – including the Sydney Light Rail – and various walking and cycling routes, and the road network. Night racing events will maximise an efficient and economic use of Sydney's infrastructure network, including the recently constructed light rail.

Given the site is already demonstrated as suitable for racing events, and the proposed night racing is in the public interest, this application should be approved for the following reasons:

- The proposal satisfies the applicable local and State planning policies.
- The proposal is highly suitable for the site.
- The proposal is in the public's best interest.
- The proposal appropriately addresses each item within the SEARs.

Having considered all the relevant matters, we conclude that the proposed development has significant merit and should be approved.

## 8. DISCLAIMER

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

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**SEARS RESPONSE TABLE**

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# **LIGHTING IMPACT ASSESSMENT**

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