

Friday, 16 December 2022

Planning and Assessment Department of Planning and Environment, Locked Bag 5022, Parramatta NSW 2124

(Submitted electronically via NSW Planning Portal)

To whom it may concern,

# ATC – SUBMISSION SUMMARY ON PARRAMATTA LIGHT RAIL (PLR) – STAGE 2

Due to the significant landholding size and unique environmental characteristics of Rosehill Gardens Racecourse, the ATC considers itself to be a critical stakeholder in the planning process for Stage 2 of the PLR project. The ATC has been in discussions with Transport for NSW (TfNSW) and DPE for several years regarding the impacts of both the PLR – Stage 1 and the Sydney Metro West project on Rosehill Gardens Racecourse (RGR). The consultation to date has been undertaken with a great spirit of cooperation and transparency. ATC strongly support Stage 2 of the PLR, with respect of the rapid growing population in this region. To this point the ATC appreciates and looks forward to ongoing meaningful discussions in this regard.

The ATC is a not-for-profit organisation with all income reinvested for the benefit of its members and the thoroughbred racing industry. The ATC owns and operates a number of racecourses, thoroughbred racing events, training and stabling facilities across NSW. As you would be aware, the ATC are the owners and operators of RGR (also known as Rosehill Racecourse) with an extensive history within Australia's racing culture for over 130 years.

Theatrical entrepreneur John Bennett bought a large slice of Rosehill for a racecourse and recreation ground in 1882. The course opened in April 1885 and Bennett even built a private railway track connecting it to the main line at Clyde. In 1903, the Racecourse Railway station was built to service the racecourse, which increased patronage of the track. In fact the George Ryder Stakes was originally known as the Railway Stakes which begun in 1903.

In other words, the racecourse and the public transport access are intricately linked and this access must be maintained to preserve this history and maintain a safe and easy access to the site at all times.

RGR is considered one of Western Sydney's premier entertainment precincts and a major thoroughbred racing venue in Australia. RGR also offers 34 unique venues for non-race day events. ATC supports 2000 jobs, contributes \$250m in NSW taxes and Rosehill Gardens has an economic contribution of \$562.5m to the NSW economy with racing, events and conferences.

### PLR Stage 2 Alignment

The ATC is generally supportive of the preferred Stage 2 PLR alignment continuing along the Grand Avenue alignment heading East towards the stabling facility and North to Melrose Park. Importantly, the ATC wish to note that further consideration should be given to the staging of the works in



accordance with the proposed infrastructure required to enable the Camellia-Rosehill place strategy outcomes. Staging of the PLR Stage 2 works should not delay any of the required infrastructure to enable the Camellia-Rosehill precinct with the ATC eager to understand the coordination and cooperation TfNSW has established with the various planning authorities and Sydney Metro.

Additionally, a residual land management plan is required to be established **early in the design phase** and consultation with neighbouring business and landowners is key. ATC would be eager to understand what / if any residual land surrounding the ATC exists post design. ATC would be interested to discuss these land holdings in the interests of purchasing residual land or ownership transfers for consideration where relevant.

# Consultation - Design, Construction and Pre/Post Operation

ATC is a major landowner within the Camellia - Rosehill precinct. Rosehill Racecourse is an important asset to Greater Sydney and a key economic contributor. ATC requests that a regular, minuted forum be established between TfNSW and major businesses including the ATC to have its say during design and development, including operation of the PLR. Furthermore, and as a baseline, ATC requests that an engagement plan with businesses is established and executed ongoing as part of the broader PLR works.

### **Urban Design**

ATC is currently developing its Master Plan and urban design principles for its site at Rosehill Gardens racecourse. Based on experience with the Stage 1 PLR, the ATC believe it is paramount that early engagement and ongoing workshop opportunities are enabled with the TfNSW Urban Design team.

The urban design initiatives and requirements to be discussed further are as follows:

- 1. Visual and pedestrian connectivity from key ATC vantage points (i.e. site entries etc) to the proposed Sandown Boulevard are to be duly considered and established as a key principle.
- 2. Curation of the Sandown Boulevard to have a greater racing architectural design and detailing to establish a greater arrival experience, destination and relationship with the Racecourse site.
- 3. Minimise visual impacts in the precinct both during construction and operation of the light rail alignment.

#### Sandown Boulevard

ATC further notes an opportunity to engage with TfNSW to reconsider the naming of the Sandown Boulevard. In racing terms, the Sandown reference is synonymous with a Victorian based racetrack. ATC preference would be for this platform to have a greater racing focus and a naming convention reflective of the proximity to Rosehill Gardens Racecourse. ATC wishes to engage directly with TfNSW to rename Sandown Boulevard to ensure the location is synonymous with the Racecourse.

#### **Transport and Traffic**

ATC wish to work more closely with TfNSW on the traffic and transport initiatives, issues, opportunities and constraints to ensure seamless transition from alignment design, construction and through to operations. ATC consider the minimisation of transport and traffic access and egress issues as key to its ongoing operation of the racecourse into perpetuity.

The ATC seek to make the following comments in relation to traffic and transport, as follows:

1. ATC support for 24 Hour light rail operation for certain special events including on New Years Eve.



- 2. Further consideration to additional shelters and feature lighting to be provided at the Sandown Boulevard.
- 3. Consideration for a larger platform at the Sandown Boulevarde platform to support the Racecourse.
- 4. Further consideration given to the inclusion of embedded tracks and additional finishes (i.e. Pavers) to the Sandown Boulevarde to ensure a premium platform outcome is achieved.
- 5. ATC supports the inclusion of a platform at Sandown and the Camellia East.

Additionally, any planned realignment of Grand Avenue or any other road(s) that may impact ATC should be done in consultation with the Racecourse. Once available, ATC requests access to traffic modelling for review and consideration by its own traffic engineers to make comment for TfNSW consideration during design development.

ATC notes the reference to the *Active Transport Link* enablement pathway running South from the PLR Stage 1 network into Rosehill Gardens, and through PLR Stage 2 via Sandown Station. To date, the ATC has achieved minimal clarity from the NSW Government on the specific details of this link. The ATC wishes to engage further with TfNSW to determine the use, design, delivery and programme of the Active Transport Link with a view of working collaboratively with all levels of Government as we develop our precinct Master Plan.

# **Flood Management**

ATC wishes to confirm that the PLR Stage 2 alignment traverses through flood prone land. Confirmation is required from TfNSW on the following:

- 1. That as a result of the light rail, flood levels across to the Camellia do not change.
- 2. That due to both construction and operation of the PLR that works will not impact existing flood levels on ATC land.
- 3. That the most current and up to date survey data has been utilised to inform the flood assessment.

Furthermore, ATC request TfNSW make available flood models to major landowners to undertake a review as required.

# **Property and Access**

ATC has generally reviewed the property and access provisions within the EIS documentation. ATC wish to confirm with TfNSW whether it proposes any temporary or permanent impacts to access and egress from the ATC land as a result of either construction or final operation of the PLR Stage 2 alignment.

Additionally, and as stated above, free and unobstructed access from the light rail into ATC land is paramount with a clear line of sight into the racecourse to be established early in the design process.

Finally, ATC is engaged to consider the opportunities for safe property, cyclist and pedestrian access during all stages of the PLR Stage 2 lifecycle.

# **Special Events Management**

ATC requests that TfNSW engage frequently with landowners to identify any special events that are likely to be disrupted by light rail works or operations. ATC would require minimum notice periods to be agreed and a replacement services plan established to ensure continuity of operations and patron safety.

# **Operational Noise and Vibration**

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Upon confirming the approach to operational noise mitigation as part of the design process, ATC requests TfNSW engagement to discuss impacts from PLR works on the ATC site. An established process for noise exceedances is required in consultation with ATC given the sensitivity of its operations to noise and vibration.

### Impacts on Businesses

ATC welcomes the establishment of a Business Management and Activation plan. Prior to the finalisation of this Plan, ATC requests meaningful consultation with TfNSW to ensure minimal disruption to ATC operations.

#### Soils and Site Contamination

In relation to Soils and Site contamination, ATC wishes to make the following points:

- 1. That the Light Rail works minimise any disruption to contaminated soils and any existing remediation systems currently installed throughout the precinct.
- 2. TfNSW to ensure that adequate and ongoing ground water monitoring (incl. establishing baselines) is implemented for the precinct.
- 3. That any ground water tests are continually assessed to ensure soil disturbances / ground water contamination / leakage as a result of the works can be identified and rectified immediately.

#### **Next Steps**

The ATC, strongly support Stage 2 of the PLR which we see as a great means of linking the entertainment and sporting precincts of Parramatta, Rosehill and Homebush. ATC appreciates the ongoing consultation with TfNSW and DPE, and would be grateful if we can continue open discussions on this exciting project.

ATC would propose to meet with TfNSW in January / February 2023 to discuss the comments within this submission. ATC looks forward to establishing a regime of regular dialogue and consultation with TfNSW particular as it nears major milestones on the project from design through to operation.

Yours sincerely

#### AUSTRALIAN TURF CLUB LIMITED

Steve McMahon General Manager Corporate Affairs & Government Relations