



Department of Planning, Industry & Environment  
GPO Box 39  
Sydney NSW 2001

01 July 2021

**Ref No:** F2021/00252

Attention: Rodger Roppolo

Application No: SSD-8706

Dear Rodger,

**Re: Randwick City Council submission on the State Significant Development SSD-8706 – Night Racing at Royal Randwick Racecourse (SSD-8706)**

I refer to the exhibition notice seeking comment on the State Significant development application (SSDA) lodged by the Australian Turf Club for night racing at the Royal Randwick Racecourse.

The proposal involves the use of the Royal Randwick Racecourse for 16 night racing events per year, held on Thursdays, Fridays, Saturdays and Public Holidays between 6pm and 10pm. Works associated with night racing events include:

- 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.

Council Officers have reviewed the application and provide the following in response. Council will provide comment on draft conditions following the Response to Submissions.

**This submission dated 1 July 2021 incorporates the Council resolution of the 29 June 2021 (attached) and supersedes the previous draft uploaded on to the portal on 21 June 2021.**

**Event numbers and scheduling**

1. The proposal has the potential to result in unacceptable amenity impacts to adjoining properties, including (but not limited to) traffic and parking impacts on the local road network, light spill to adjoining properties and noise and patron management. The submitted Environmental Impact Statement (EIS) and accompanying documentation is vague on event numbers and scheduling and does not adequately assess potential impacts. Where potential impacts are identified, Council is concerned that inadequate measures have been recommended to address these impacts.

2. Further information is required around the total number and scheduling of events. The EIS submitted states that the 16 proposed night racing events would not increase the net number of racing events held at the Racecourse per year (currently approximately 45 per year) as the proposal would see a number of existing day racing events converted to night racing. Council recommends conditions are included that limits the total number of race events a year to a maximum of 45 events per year.
3. Clarification is sought as to whether racing events will be held during the day time and night time on the same calendar day, and if so whether this day/night event would be included as one of the proposed 16 night racing events. A total number of day time, night time and combined day/night time race events should be provided.
4. If combined day/night racing events are proposed, further information is required as to how patron numbers are managed throughout the day and into the evening to ensure the maximum patron capacity limits are complied with.
5. Clarification is also sought regarding the scheduling of events. While it is understood that specific event dates are determined by Racing NSW, further information is required on the process of event scheduling, particularly in relation to the potential cumulative impact of multiple events being held at nearby venues including the Sydney Football Stadium and Sydney Cricket Ground.

### **Hours of operation**

#### Racing

6. Clarification is required in relation to the proposed extended hours of operation until 10.30pm in the event races are delayed. The EIS states that extended hours of operation would only be required in exceptional circumstances. Information is requested outlining how often the existing race schedule runs overtime to assess the proposed extended hours of operation and associated impacts.

#### Spectator Precinct

7. Proposed hours of operation for the Spectator Precinct are unclear and require further clarification. It is understood that the proposed hours of operation until 10pm relate to races. If races are scheduled to conclude by 10pm, how will patrons be managed beyond this period. For instance, will patrons be permitted to cash out or order drinks after the last race has concluded. Council recommends that races be scheduled to allow ample time for post-race activities such as cashing out. Further, food and beverage service should conclude 30 mins before the last race. Conditions should be recommended in this regard.
8. It is understood that bump-in/bump-out activities are proposed after the scheduled race hours of 6pm to 10pm. While some bump-in/bump-out activities such as cleaning are unlikely to result in unacceptable impacts to surrounding properties, other activities such as waste collection and dismantling of structures may result in unacceptable impacts and should not be carried out during night time hours. Conditions should be recommended in this regard.

### **Noise and patron management**

9. Concerns are raised regarding the operation of night racing and the potential to impact the amenity of the surrounding residential area. Potential impacts of most concern are noise emissions during the race events as well as patron behaviour when leaving the Racecourse at the conclusion of events. This is a particular concern during large events where the efficient and expedient egress of patrons requires careful security management, clear movement pathways and adequate pedestrian safety lighting, signage and adequate transport capacity.

10. The implementation of robust noise controls and monitoring during night racing events and the effective security management of patrons, including sufficient transport options are key in minimising the impacts from noise during the event and when patrons are leaving the Racecourse.
11. The various management plans for the proposal, if implemented effectively and diligently, contain relevant measures to mitigate, but not eliminate the potential impacts of most concern.
12. Council recommends that an on-going stakeholder forum is established that is capable of reviewing and, if required, implementing any necessary changes to, or the provision of additional measures to mitigate issues that may arise as the night program is delivered. At a minimum this forum should include the relevant event management representatives from the ATC, their security provider and their acoustical and transport consultants, relevant Council staff, NSW Police, Transport for NSW and representatives and representatives from the community.
13. In addition to an on-going stakeholder forum, Council recommends the imposition of appropriate conditions to prompt for better communication with the surrounding neighbours at least 1 week prior to the event (i.e. letter drop with relevant event details including complaint hotline).
14. It is noted that at this stage, night racing events on Sundays are not proposed. Council supports this, as there is concern the level of amenity that is generally expected on Sunday evenings by surrounding residents would not be maintained. For this reason, Council does not support night racing events on Monday evenings in the event that Public Holidays fall on a Monday.

### **Transport and parking**

15. Concerns are raised with regard to the impact of private vehicle on the local street network. Council is aware that some patrons who drive to the RRR currently park in local streets and do not utilise the infield car park due to the time it takes to exit the car park at the conclusion of events. This leads to traffic and parking congestion in local streets surrounding the RRR. The submitted EIS and supporting documentation does not adequately address this issue. An assessment of parking impacts on the local road network should be undertaken to assess the impact of patrons parking in local streets.
16. The signposting and enforcement of parking restrictions for (seemingly) random night-time race events will be very challenging. Council's previous experience with parking restrictions on 'Race Days Only' produce significant issues, as most Sydney residents do not know when race day events are being held at RRR, nor should they be expected to. This has resulted in non-event motorists being issued with Parking Infringement Notices in the past.
17. If residents or their visitors are not aware of night racing events, they are likely to park in local streets, even if the street is signposted as '2P Residents Excepted, Race Days/Nights'. Additionally, Council considers night time parking restrictions imposed upon communities as an unacceptable burden, as it shifts the responsibility of parking management to individual residents and their visitors, rather than the venue operator. Further, the management of overflow night-time parking on local streets creates resourcing challenges for Council to manage night time restrictions.
18. There are strong concerns about the traffic impacts of the proposals. These concerns are supported by the SIDRA modelling contained within the submitted Traffic Impact Assessment. All of the key indicators arising from the modelling of Class 2 (up to 15,000 patrons) and Class 3 (up to 10,000 patrons) events under both operating scenarios result

in significant increases in each of the critical SIDRA indicators, including major increases in Delays, Degree of Saturation and 95th Percentile Back of Queue Distances.

19. Such major increases in these SIDRA indicators, in a neighbourhood where many of the existing intersections are currently performing with a Level of Service of F, is unacceptable. The overlay of the additional event traffic onto a neighbourhood with traffic flows currently performing poorly, will create major delays, congestion and subsequent frustration for the event and non-event community.
20. The acceptance within the Traffic Impact Assessment (page 37) that modelling shows extension to delays in the network around the majority of intersections surrounding the RRR is particularly concerning, especially within a local network already under traffic stress.
21. Additionally, it is noted that the Traffic Impact Assessment advises that high traffic activity is expected *'where arrivals will coincide with the evening commuter peak. These associated impacts particularly relate to Class 3 events which is anticipated to be sustained for 1-2 hours, up to 12 events per year.'* Such high traffic impacts for 1-2 hours is unacceptable for the local road system.
22. The preparation of Pedestrian, Transport and Traffic Management Plans, Traffic Control Plans, a taxi management study and consultation with MEOG are all supported. As is notifying residents and promoting public transport. It is noted that shifting taxis/ubers to Gate 1 appears to create traffic problems along Alison Road, which should be addressed. Measures such as staggering arrivals, promoting car-pooling, seeking to increase mode share of cyclists, supporting increased shuttle services between hotels are also supported. However, undertaking continued patron surveys and regularly updating the website seem to be of limited value regarding car travel mitigation.
23. To address the 1-2 hours of traffic impacts the Traffic Impact Assessment recommends that *'the available public transport options be promoted and encouraged as a means of reducing the number of patrons opting to drive to these events.'* The encouragement of public transport options is very much supported by Council, however, that approach will not address the traffic congestion problem.
24. A further concern, along Doncaster Avenue, is the interaction between bike riders on the soon to be constructed two-way cycleway and motorists, particularly at the Doncaster / Ascot Street intersection. The Traffic Impact Assessment rejects the need for traffic signals at the Doncaster/Ascot Street intersection, however Council recommends that signals should be installed. Signals will clarify for all road users, the priority at this intersection, which would be very important from a road safety perspective – especially during night time events.
25. In summary, Council has significant concerns about the indicated traffic and parking effects. It is recommended that all tickets to night time events must be pre-ordered and must include integrated ticketing. In other words, every ticket purchased must include free public transport to and from the venue. Additionally, a clearer explanation of how the traffic will be managed on surrounding streets, to reduce the indicated 1-2 hours of high traffic impacts during peak times, must be prepared and submitted to Transport for NSW and Council for assessment.

### **Mechanical noise**

26. A number of the proposed four diesel generators are located within close proximity to residential properties. An acoustic assessment of the generators should be undertaken to assess potential noise impacts on nearby residents.

### **Protection of significant trees**

27. Concerns are raised over the potential impact of the proposed lighting column locations on existing significant trees. The Visual and Landscape Impact Report prepared by Sturt Nobel and Associates identifies three lighting columns in close proximity to exceptionally significant trees and three columns located in close proximity to existing trees of high significance. Potential impacts have been identified including damage to tree roots and incursion into Tree Protection Zones (TPZ). The Report recommends that physical assessment should be re-reviewed in consultation with an arborist at detailed design stage. Further, the EIS states that the exact final location of columns may vary up to 10% due to arborists advice during detailed design.
28. Council does not support the removal or substantial pruning of trees listed as significant under the Randwick Register of Significant Trees. As such, Council recommends that an Arboricultural Impact Assessment be undertaken as part of the SSD assessment and prior to the detailed design stage to ensure the proposal will not result in unacceptable impacts to Council's Register of Significant Trees.

### **Visual Impact on heritage items and conservation area**

29. The number, distribution and bulk of the proposed lighting columns will have a high degree of visibility from surrounding streets, from heritage items internal and external to the site and from the adjacent Randwick Racecourse heritage conservation area.
30. The Visual and Landscape Impact Report recommends new tree planting to provide screening along Allison Road and the boundary to the Racecourse adjacent to impacted residences, however no details of tree planting including exact location, species or timing of planting have been provided. Given the high degree of visibility of the proposed lighting, Council recommends details of the proposed tree planting be included in the SSD proposal to ensure appropriate mitigation of the visual impact.
31. Details of the finish of the lighting columns is not clear and further detail should be provided for clarification. For instance, the Visual Impact Assessment Report recommends the use of light coloured or galvanised columns and fittings to reduce visual impact from the poles, however the Mitigation Measures contained within the EIS suggests painting the columns in a dark colour so they recede in visual significance. Council recommends details of the finishes of the poles be provided for assessment. A dark recessive colour should be considered.
32. No detail of the size or appearance of the generators has been provided, and it is unclear whether the generators will be housed within some sort of enclosure. The submitted Heritage Impact Statement recommends appropriate screening of the generators is provided in the form of a timber or perforated metal enclosure or fence. However, depending on the appearance of the generators, and whether they will be enclosed, further screening could add to the bulk of the installation. Council recommends details of the generators and proposed screening are provided for assessment.
33. Notwithstanding the size and appearance of the generators, Council recommends that the generators not be used and alternative power sources be provided for trackside lighting.

### **Sustainability**

34. Clarification is required as to why the trackside lighting cannot be powered by mains electricity. Further, investigation should be made into the potential to provide green energy power in the form of photovoltaics on existing rooftops and/or battery storage to power the trackside lighting.

### **Aboriginal archaeology**

35. The Aboriginal Heritage Due Diligence letter prepared by McCardle Cultural Heritage includes a number of recommendations for the protection and management of protected sites and places of significance. The recommendations make reference to site 45-5-3968, however the site number is not discussed elsewhere in the Due Diligence letter or EIS. Clarification is required in this regard.
36. The assessment of Aboriginal archaeology is sufficient to meet statutory requirements, and the recommendations of the Due Diligence letter should be included as consent conditions, subject to clarification of the site number which has been quoted.

### **European archaeology**

37. The Heritage Impact Statement prepared by Urbis includes the Potential Historical Archaeological Significance mapping from the 2006 Godden Mackay Logan Conservation and Management Plan for the site which identifies areas on the site having Moderate Significance and Low Significance in relation to historical archaeological sensitivity. No assessment of the proposal in relation to this mapping has been provided however, and the SSD submission is deficient in this regard.
38. The Potential Historical Archaeological Significance mapping identifies a number of sites within the Spectator Precinct and the ARF Laboratory Area, associated with previous structures, as being of Moderate significance and it is unclear whether excavation for the footings of the proposed light columns will impact on these archaeological values.

### **Impact of light spill on nearby properties**

39. Consideration should be given to the potential impact on the nearby properties from the proposed upgrade of Spectator Precinct lighting. The layout of the proposed lighting is missing in submitted Lighting Assessment and the extract in the EIS is illegible.
40. Council recommends a condition of consent requiring post installation adjustment of trackside and Spectator precinct lighting, to address any unacceptable light spill be found to adjoining properties.
41. It is understood that trackside lighting levels have been designed to enable televised racing. However on occasions where racing is not televised, a lower level of lighting should be required to reduce unnecessary light spill impacts. Conditions should be recommended in this regard.
42. The submitted EIS states that events will be concentrated between October and April to coincide with day light savings, reducing the hours required for lighting and therefore reducing the overall light spill impacts to adjoining properties. However, the EIS also states that flexibility is required to hold events outside of these months. Council recommends events be limited to between October and April to reduce the impacts of light spill to adjoining properties.

### **Impact of light spill on the local environment**

43. Concerns are raised regarding the night-time impacts of proposed lighting on the grey headed flying fox roosting colony located in Centennial Park. The grey headed flying fox *Pteropus poliocephalus* is listed as vulnerable under the NSW *Biodiversity Conservation Act 2016* and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.
44. The new Commonwealth National Light Pollution Guidelines for Wildlife (January 2020) state that the indirect effects of artificial light can be detrimental to threatened species. The guidelines recommend that where there is important habitat for listed species that are known to be affected by artificial light within 20 km of a project, species specific impacts

should be considered through an Environmental Impact Assessment (EIA) process. The Lighting Impact Assessment provided at Appendix A of the EIS states that there would be minimal impact on local flora or fauna. However, it does not appear that an assessment of the potential impacts on the grey headed flying fox colony has been undertaken.

45. Council recommends that an assessment of the potential impacts on the Centennial Park colony of grey headed flying fox be undertaken in accordance with Commonwealth guidelines.

I trust that Council's comments will be taken into consideration for this proposal. Should you have any questions regarding the submission, please contact Natasha Ridler, Coordinator Strategic Planning, on 9093 6961.

Yours sincerely,



**Stella Agagiotis**

Manager Strategic Planning

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# FOR ACTION

ORDINARY COUNCIL

29/06/2021

TO: Manager Strategic Planning (Agagiotis, Stella)

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**Subject:** Council submission - Night Racing at Royal Randwick Racecourse  
**Target Date:** 13/07/2021  
**Notes:**  
**Document No.:** D04228452  
**Report Type:** Report  
**Item Number:** CP41/21

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**RESOLUTION: (Roberts/Stavrinou)** that Council:

- a) endorse the submission on the proposed SSD-8706 for night racing at the Royal Randwick Racecourse;
- b) authorise the Director City Planning to make minor editing and formatting changes to the submission prior to its finalisation; and
- c) removes the reference to a three-year trial and also removes its preferences specifying the nights of the week for meetings from the Council's submission.

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