

## For Official Use Only

Department of Planning, Industry & Environment  
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**NSW Police Force**  
[www.police.nsw.gov.au](http://www.police.nsw.gov.au)

Attention: Rodger Roppolo

**Application Number: SSD - 8706**

### Venue Details

Royal Randwick Racecourse  
Alison Road, Randwick, NSW, 2031

### Application for:

*Proposal for up to 16 night racing events per annum at Royal Randwick Racecourse, facilitated by the installation of trackside lighting infrastructure, and the upgrade of Spectator Precinct lighting.*

NSW Police has a vital interest in ensuring the safety of members of the community and their property. By using recommendations contained within this document, any person who does so acknowledges that:

- *It is not possible to make areas evaluated by NSW Police absolutely safe for the community and their property.*
- *Recommendations are based upon information provided to, and observations made by NSW Police at the time the document was prepared.*
- *The evaluation/report is a confidential document and is for use by the person/organisation referred to on page one.*
- *The contents of this evaluation/report are not to be copied or circulated otherwise than for the purposes of the person/organisation referred to on page one.*

Police have assessed the documentation provided as part of this State Significant Development Application for up to 16 night racing events per year at the Royal Randwick Racecourse and the upgrading of infrastructure within the site.

While there is apparent interest in the inclusion of night-time Thoroughbred racing into the racing calendar, the current proposal is not in the best public interest particularly for the local residents or the safety of the general public. Further explanation is required to satisfy the concerns raised.

Police have safety concerns regarding this application which are outlined below regarding the access and egress for the proposed events. Further, Police believe that the local amenities of the areas surrounding the venue will be negatively affected.

It should be noted that author of this response, along with relevant stakeholders in the events area at Eastern Beaches PAC were not aware of this application prior to the submission of this Development Assessment, despite the Secretary's Environmental Assessment Requirements (SEARs). This application was not raised at any meeting that Eastern Beaches PAC have had

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with the management of the Australian Turf Club over the past two years. It would appear that if any consultation has taken place it was not been within the last 2 years.

### **Hours of Operation**

The application seeks to hold races between the hours of 6pm to 10pm on Thursday, Friday, Saturday or Public Holiday nights. However, within the Environmental Impact Statement, the applicant is seeking provisions for the racing and the lights to be operational in exceptional circumstances. Further clarification is needed outlining what these exceptional circumstances are, how this will affect the management of the PA system, lighting, egress, transport as well as the sale and supply of liquor to patrons.

Further, the application does not provide any information in relation to a night race meet forming an extended part of a standard day fixture potentially allowing for a race day to run from 10am until 10pm. The venue has previously had issues with intoxicated patrons on a standard race day. This raises serious concerns as to how the venue is intending on managing the level of intoxication of the patrons should they extend their operation by a further 4 hours. This additional 4 hours will have an undue impact on the local community and the local amenities of the neighbourhood in both venue operational noise, traffic congestion and patron noise during the egress.

The application is very non-committal in relation to what will be occurring after 10pm on the race nights. The application refers to the conclusion of races at 10pm (or 10:30pm in exceptional circumstances) however it does not conclusively state how the patrons will be managed at the conclusion of this last race, nor does it express when the sale and supply of alcohol will conclude (It is noted however that in the Alcohol Management Operations Register from 2019 that bars will close “approximately” ½ hour to an hour after the conclusion of the last race).

### **Race Days**

The application calls for 16 night races per year and would increase the already “approximately” 45 races available for patrons could attend. As raised previously, should they combine day races with night races, would this count as one race day or two? Further clarification is required to this end.

The Application is also silent in relation to the possibility of race meets being held on consecutive days. Should the race calendar be produced for multiple race days in a row, this will cause undue stress on the local community though repeated days of race day activities including noise, traffic congestion issues and neighbourhood amenity issues associated with potentially intoxicated persons in the local residential streets.

The proposal continually refers to predominately being held between October and April each year. Within the Environmental Impact Statement, the scheduling of the races is deferred to Racing NSW and leaves the application open for vast changes as to when these night races will occur. This ambiguity within the schedule will leave the local residents, Randwick Council, Transport for NSW and the Police uncertain as to when to be planning for these night races and the organisation of their resources.

### **Intoxicated persons**

Intoxicated persons both within the Royal Randwick Racecourse and the surrounding areas are of a great concern to Police. Police observe on a regular basis a large number of patrons being

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excluded from the venue due to their level of intoxication. This is further highlighted by the 2019 infringement which was issued by Liquor & Gaming NSW for the offence of 'licensee/employee sell/supply liquor to intoxicated person' under section 73(2) of the Liquor Act. While steps have been made by the Australian Turf Club to address intoxication issues within the venue, the issue of intoxicated patrons still remains, and will continue to remain while alcohol service is available. Within the applicants own Environmental Impact Statement, they have stated multiple times that they are expecting the night races to have a heavier focus on consumption of alcohol than day races. This raises concerns with Police as it raises the risk of patrons consuming more alcohol and increasing their level of intoxication.

Police can also see a risk of transferal intoxication to other licensed venues, as well as within the surrounding neighbourhood. This occurs when a person consumes large amounts of alcohol at one venue and before the affects of intoxication occur the patron moves to another venue (or to a public place) where these affects take hold and become the responsibility of another person. Police regularly see patrons of the Randwick Racecourse in surrounding areas including Randwick, Coogee, Clovelly, Newtown and the CBD arriving in an intoxicated state attempting to enter licensed premises. Police can see this potential issue being exacerbated on a Friday or Saturday night with groups of people making the Royal Randwick Racecourse the beginning of their night before moving off into other areas resulting in an increase in patronage in venues already being at near capacity.

The Royal Randwick Racecourse also has a history of alcohol related violence with the venue being notified of reviews under the former Violent Venue Scheme managed by the Liquor Act prior to the scheme's revocation. While the venue was exempt due to its status as a sporting facility, the history of violent incidents within the venue (and away from) the venue needs to be raised.

With the Randwick Racecourse being surrounded by residential neighbourhoods, Police foresee a large number of intoxicated patrons transgressing thought these areas to attend other venues, light rail stations, obtain taxis or other rideshare transport. These intoxicated patrons will affect the quiet good order and nature of these surrounding residential neighbourhoods to the detriment of the local communities.

### **Transport & Pedestrian Management Plan**

Police note that the Transport & Pedestrian Management which references Traffic Management (appendix A) provided with this application is dated for the Spring Carnival in 2019. This plan is not relevant to the application as it stands. The event times in this are incorrect, it does not incorporate the Light Rail network, Public Transport Timings are not relevant, it does not include Ride Share vehicle drop off/pick up, etc. It is also noted that there are references User Charges Police on egress for "major events". This has not been negotiated and further consultation would be required given the lower patron numbers as proposed.

The primary risk in relation to traffic and transport will be the egress of patrons at the conclusion of the event with possible intoxication crossing Alison Road, Ascot Street & Doncaster Avenue.

### **Pedestrian Access and Egress**

Pedestrian access and egress from Royal Randwick Racecourse is always a concern. With the plan for public transport being heavily focussed on the Light Rail Network, if this plan is to go ahead, there will be up to 450 patrons attempting to cross Alison Road, per service during peak hour traffic driving along Alison Road (more on egress). With this number of people attempting to

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cross Alison Road it will result in an increase in traffic delays and the risk to pedestrian safety. These pedestrian safety risks will increase should they attempt to cross against the red traffic control signals.

The plan to shut gate 18 for pedestrian egress from 8pm will reduce the patrons noise affecting the neighbourhood amenity on Ascot Street and Doncaster Avenue, this will just direct potentially 15,000 patrons onto Alison Road at the conclusion of the night. This plan creates the greatest possible risk for pedestrian safety with the sheer number of patrons being moved in this direction, with many of them intoxicated. At this time of night, there will be diminished visibility due to the night time hours and glare from other road users. This will become particularly hazardous for the pedestrians as they attempt to cross Alison Road to access the Light Rail network.

### **Traffic**

During a standard race day Police regularly observe extended traffic issues along Alison Road, Ascot Street and Doncaster Avenue. These traffic issues occur throughout the racing fixtures, however, are most noticeable during the egress at the end of the fixture. Given the proposed timing of these night races, these traffic issues will commence during the evening peak hour and then again become a significant issue around 10pm. This increase in traffic this late at night will cause undue harm to the local neighbourhood.

There will be significant traffic issues along Alison Road as pedestrians attempt to cross the road from the Light Rail station. The delays caused by pedestrians crossing Alison Road will result in a bank up of traffic both East and West bound.

The proposal to utilise gate 'A' for all Taxis and Rideshare vehicles, will also see and increase in queuing along Alison road for vehicles looking to gain access to the pickup point.

The applications own Traffic Impact Statement advises that high traffic activity is to be 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". This impact is concerning given that there is already a heavy load of traffic on many of these streets. This additional congestion *will* impact Emergency Services ability to respond to incidents.

### **Transport**

As mentioned previously, the Transport & Pedestrian Management Plan is dated 2019, with much of the information provided within it being irrelevant. The Spring Carnival in 2019 was held on Saturdays during the daytime and was to cater for crowds of up to 40,000 patrons. An updated Transport & Pedestrian Management Plan will need to be provided specific for the night races and allowing for the varying aspects including class of event and the night of the week it is held.

#### ***Light Rail***

The Transport & Pedestrian Management Plan document as provided does not include the use of the Light Rail network which has been operational since 2020. While this was factored into the Transport Impact statement, it has not been included in any management plan, nor is there any information as to how they are going to manage the patrons crossing Alison Road or potentially several thousand patrons on the platform of the Light Rail.

#### ***Buses***

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While the application states that Royal Randwick Racecourse intend on utilising the Bus stand that is incorporated with the racecourse, the information contained within the Transport & Traffic Management Plan is out of date and does not cover the new proposed event time.

### **Taxis**

The Plan calls for taxis to enter and egress via gate A from 8pm. This will create queuing issues along Alison Road in both Easterly and Westerly Directions. There is no information as to how this is going to be managed. Likewise, with the hire vehicles that are utilised by patrons.

### **Ride Share**

There is no mention within the plan as to how the Royal Randwick Racecourse plans on managing patrons who arrive or depart through the use of Ride Share operators. There is no information as to negotiations with the operators of the Ride Share companies to make designated drop. Further, operators of Ride Share vehicles (and private vehicles) dropping off and picking up in unauthorised areas (e.g. the 'No Stopping' area on Alison Road) will cause additional safety issues to pedestrians and other road users as well. Further consultation and information is required as to how the Royal Randwick Racecourse is planning on managing this method of transport.

Police are also concerned about the patrons who attend Royal Randwick Racecourse in their own private vehicle and utilise the parking in the surrounding neighbourhood streets. The Environmental Impact Statement submitted does not adequately cover this occurrence and defers any potential impact to the Randwick City Council to provide solutions including introductions of additional parking restrictions.

### **Neighbourhood Amenity**

Due to the large number of people attending the event from outside the area and potentially lengthy delays for transport, the applicant has not factored in toilet facilities or other amenities once the patrons have left the venue. With no toilet facilities within the area, Police are concerned that this will result in intoxicated persons urinating in public streets of a residential neighbourhood, in particular under the cover of darkness. Police are also concerned about the level of noise pollution associated with the number of potentially intoxicated persons leaving the site. This is a particular concern due to the expected wait times for transport to leave the area.

### **Noise**

Police foresee an increase in noise issues affecting the Neighbourhood amenity. This noise includes patron noise, vehicle noise, PA announcements and mechanical noise. With lack of clarity surrounding post-race events these noise issues running later at night, this will cause undue stress to the local neighbourhood.

### **Security**

Again, the Security & Risk Reference book relates to the Spring carnival in 2019 which was a daytime event. While much of this is transferable to a night race meet, much of the timings are incorrect and does not address many of the concerns that have been raised.

Should the Minister grant the proposal, Police are willing to work with the applicant to ensure a safe and successful event however, re-iterate their concerns regarding the event due to the safety issues and the neighbourhood amenity within the vicinity.



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Should the Minister grant consent for this application to go ahead, Police, without prejudice, seek conditioning specific to the safety and security of the patrons, staff, emergency personnel and the general public including;

1. Night races are to be held between the hours of 6pm and 10pm. The final race must be concluded by 10pm.
- Should the minister seek to allow for the races to be run until 10:30pm, “Exceptional Circumstances” need to be defined.
2. The maximum number of night races is to be limited to 12 race meets per year.
3. The maximum number of Class 2 race nights per year is 4.
4. The maximum number of Class 3 race nights per year is 8.
5. The total number of races to be accessible by patrons is 45 per year.
6. Class 2 race nights are to have a maximum capacity of 15,000 patrons.
7. Class 3 race nights are to have a maximum capacity of 10,000 patrons.
8. Race day events and Night Race events are not to be held on the same calendar day.
9. Night race events are not to be held on consecutive calendar days.
10. A maximum of one (1) night race event is to be held per calendar month.
11. Night race fixtures are to be limited to between the months of October and April.
12. The Australian Turf Club must, in writing, provide a minimum of 28 days’ notice to the Local Police Commander, General Manager of the Randwick City Council, Transport for NSW and local residents of any night racing fixtures to be held at Royal Randwick Racecourse.
13. Prior to the commencement of the final race, a broadcast is to be made via the venues Public Announcement System that it is the final race and all patrons are to vacate the venue in a quiet and orderly manner.
14. All sale and supply of food and beverages must conclude 30 minutes prior to the final race.

This submission has been made to ensure that this development is of a good design and amenity to the local environment and that the Royal Randwick Racecourse is operated in such a manner to ensure that the quiet and good order of the neighbourhood is maintained and the safety of the public is considered. The Royal Randwick Racecourse must not unduly disturb the neighbourhood because of the manner in which the business is being conducted or because of the behaviour of persons attending the racecourse.

Further, there is a need regulate and control the sale, supply and consumption of liquor in a way that is consistent with the expectations, needs and aspirations of the community and to facilitate the balanced development, in the public interest, of the liquor industry. This is achieved through a flexible and practical regulatory system with minimal formality and technicality. However, these needs are to be balanced to minimise harm associated with the misuse and abuse of liquor (including harm arising from violence and other anti-social behaviour), and the need to ensure that

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the sale, supply and consumption of liquor contributes to, and does not detract from, the amenity of community life.

If there are any further questions regarding Eastern Beaches Police Licensing Unit's submission, please do not hesitate to contact this office on (02) 9349-9299.



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