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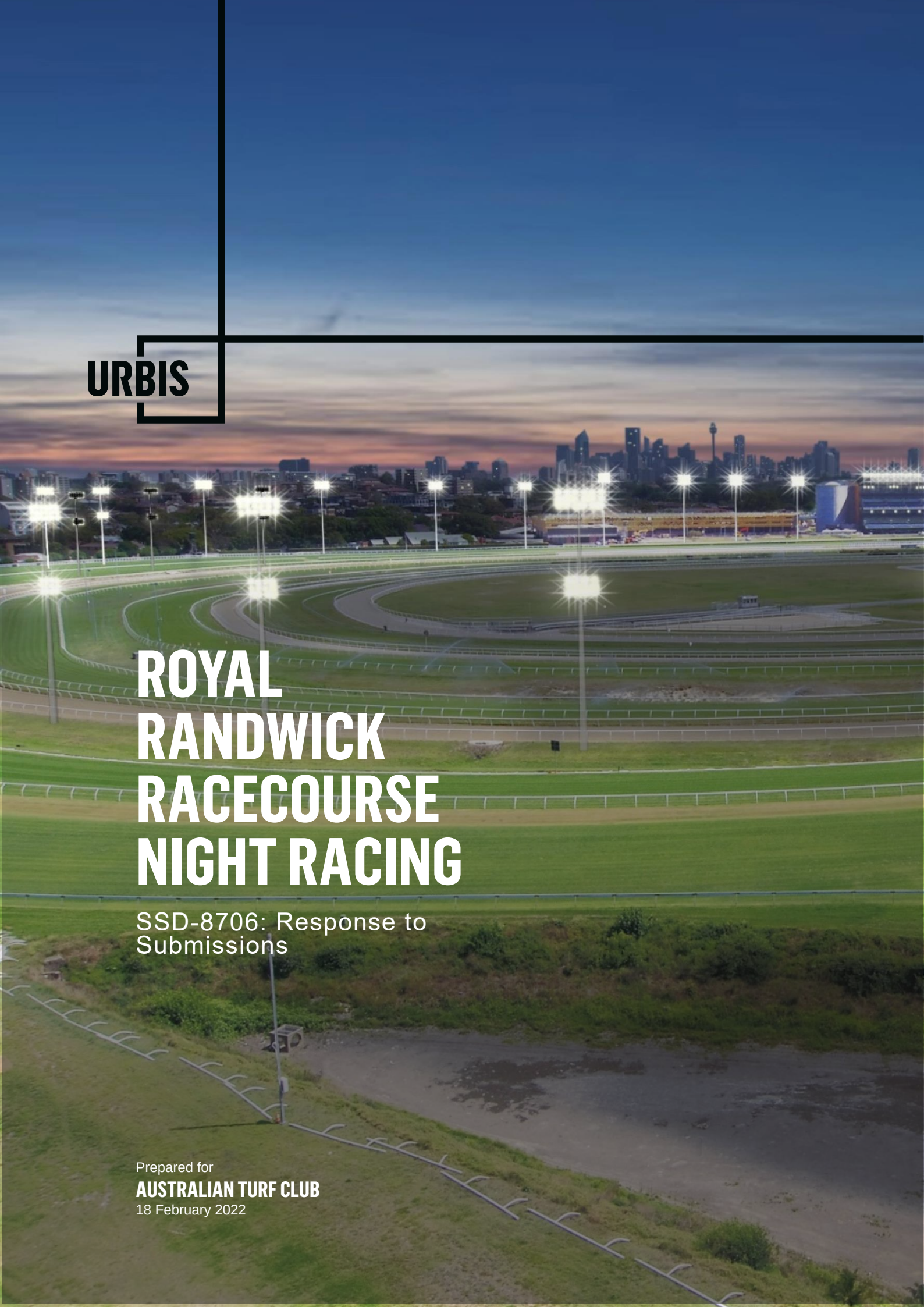

ROYAL RANDWICK RACECOURSE NIGHT RACING

SSD-8706: Response to Submissions

Prepared for

AUSTRALIAN TURF CLUB

18 February 2022

URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:

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Report Number	REVISED FINAL RTS – SSD 8706 – 18.02.2022

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EXECUTIVE SUMMARY

This Submissions Report has been prepared on behalf of the Australian Turf Club (**the Applicant**) to address the matters raised by government agencies, local Council, the community and relevant stakeholder groups during public exhibition of the proposed State Significant Development (**SSD**) application SSD-8706 for Night Racing at Royal Randwick Racecourse (**RRR**) (**the site**).

The State Significant Development Application (**SSDA**) was lodged with the Department of Planning and Environment (**DPE**) in accordance with the *Environmental Planning & Assessment Act 1979* (**EP&A Act**) and *State Environmental Planning Policy (State and Regional Development) 2011*.

DPE issued a letter to the Applicant on 23 June 2021 requesting a response to the issues raised during the public exhibition of the application. In addition to the submissions received during public exhibition, DPE requested additional information on 17 August 2021 for the following matters:

- Traffic and Parking
- Lighting
- Acoustic
- Patron Management
- Biodiversity Assessment
- Sustainability
- Architectural Plans
- Operational and construction jobs

In addition to the above, DPE has subsequently requested additional information as follows:

Table 1 RTS additional information requests

3 December 2021	**24 December 2021**
▪ Protection of significant trees ▪ Traffic and Parking ▪ Architectural Plans	▪ Protection of significant trees ▪ Architectural Plans

This Response to Submissions (**RTS**) Report outlines the clarifications and responds to all concerns raised within submissions.

Overview of Submissions

The SSDA was on public exhibition between Wednesday 26 May 2021 to Tuesday 22 June 2021. During exhibition submissions were received from NSW government agencies, Randwick City Council (**Council**) and other key public authorities. Submissions from the following public authorities were received:

- Heritage Council of Australia
- DPE – Biodiversity and Conservation Division
- Randwick City Council
- Transport for NSW (**TFNSW**)
- Centennial and Moore Park, Parramatta and Western Sydney Parklands Trust
- NSW Police

In addition, submissions were received from neighbouring property owners, residents and community organisations.

Overall, the project received a low number of public submissions during and after the public exhibition. DPE received 57 submissions in total. 45 of these submissions were from the public, five were from organisations and seven were from public authorities.

Of these submissions, whilst Randwick City Council (**Council**) and some government agencies provided comments on the application, none have formally 'objected' to the project.

A majority of residents and organisations (property strata committees) either raised concerns or objected to the proposal. Three objections were raised from residents outside of the local government area. Two residents indicated strong support.

The key matters raised in submissions from public authorities and public submissions include:

- Event size and operational management
- Noise management (from the event and patrons)
- Transport and parking
- Visual impact
- Heritage impact
- Lighting impact
- Ecological impact (Grey-headed flying-fox flight paths)

Overall, whilst the above submissions and objections have been received and identify valid concerns, the number of submissions is generally low for a project of this scale. This demonstrates a strong level of support for the project, albeit that some areas of the project have required further refinement following the public exhibition period.

Actions Taken Since Exhibition

Since the SSDA was publicly exhibited, the Applicant has undertaken further consultation with DPE, TFNSW and Council to discuss the issues raised within their submissions. This further consultation is summarised as follows:

- Further engagement with DPE has been undertaken through July to October 2021 to clarify key items related to traffic, noise and lighting assessment.
- Further engagement with DPE has been undertaken through July to November 2021 to clarify key items related to lighting. This includes meeting with DPE and its independent lighting consultant to clarify the lighting modelling undertaken by the Applicant to assess potential light spill and mitigation measures. Additional information has been provided directly to DPE and its nominated lighting consultant in October and November 2021 for clarification prior to the submission of this RTS.
- The Applicant consulted with TFNSW on 24 September 2021 to discuss its submission made during the exhibition period and confirm the appropriate methodology to satisfy TFNSW's requests. The Applicant proposed additional traffic management measures to help control the demand for transport and minimise impacts on traffic and transport operations within the Randwick Precinct.
- Subsequent to the meeting with TFNSW, a joint meeting was held with TFNSW, DPE and its independent traffic consultant to discuss mitigation measures to satisfy concerns related to traffic and pedestrian management on Alison Road and the intersection of Ascot Street/ Doncaster Avenue. A key outcome was the preparation of a Traffic Management Plan to clarify how mitigation measures will be implemented.
- Further to the meeting with DPE and TFNSW, the Applicant met with Council to discuss its submission. Key matters discussed related to operational hours, clarification on the number of events, lighting, traffic and transport management, and minimising impact on surrounding residents from lighting, noise and parking. Many of the items discussed have been considered and addressed within the revised draft Event Operational Management Plan.

Additional assessments have been prepared to respond to the issues raised within the submissions. These include:

- **Traffic Management Plan**
  - Prepared to inform the management of traffic and pedestrian access for the proposed night racing events.
- **Ecological Assessment**
  - Prepared to assess the potential impacts on the grey-headed flying foxes roosted at Centennial Park.
- **Arboricultural Assessment**
  - Prepared to assess the potential impacts of proposed light poles on existing significant trees within the site.

The findings and recommendation of the additional assessments and clarifications are discussed in detail within **Section 4** of this report.

Response to Submissions

The Applicant has retained the original proposed development description, however has provided additional information and clarification in response to the submissions and stakeholder consultation. The key issues addressed to provide clarification include:

- Additional consultation with DPE, TFNSW and Council has been undertaken to discuss mitigation measures and recommended methodologies to minimise impacts on the locality.
- Clarification on noise assessment and confirmation of proposed mitigation measures to minimise noise impacts during events.
- Clarification on traffic impact assessment, in consultation with DPE, TFNSW and Council to minimise impacts on traffic congestion, encourage use of public transport, and hours of operation. A Traffic and Transport Management Plan (**TTMP**) has been provided to clarify management measures.
- Clarification on lighting design, including confirmation that the proposed lighting is fully compliant with all Australian Standards and will cause no unacceptable light spill. Clarification is provided to confirm that proposed light poles will be galvanised steel to minimise visual impact and that the proposed use of diesel generators is an appropriate source of generating power due to the minimal usage proposed.
- Additional information has been provided through an Ecological Assessment to confirm that the Grey-headed Flying-fox camp at Centennial Park will not be adversely impacted by the proposal.
- Clarification on assessment of Aboriginal archaeology, European archaeology and Built heritage for the site.
- A revised Draft Events Operational Management Plan is provided, to further clarify mitigation measures related to noise, traffic and accessibility, residential amenity, safety and security, emergency provisions and service of alcohol.
- A new Site Plan is provided as requested by DPE. The plan contains indicative heights of proposed light poles across the site. It is noted that the Spectator Precinct lighting upgrade pertains only to the replacement of lamps on existing poles. There are no proposed changes to the existing light poles in height.
- An Arboricultural Assessment has been completed to identify the potential impacts of proposed light poles on existing significant trees within the site. Clarification is provided to demonstrate that the majority of light poles will cause no impact on significant trees. Three proposed light poles have been identified as being in close proximity to existing significant trees and the Arboricultural Assessment has recommend the minor relocation of these poles (relocation of less than 2 metres). The assessment also identifies the requirement for pruning of some trees to avoid conflict and also the removal of one tree that is unhealthy. It is noted that the proposed development description is to be revised to seek approval for removal of one tree and tree pruning as recommended by the Arboricultural Assessment.

Key clarifications

- The Applicant is seeking approval for 16 night racing events per year, concentrated between October and April (generally coinciding with NSW Daylight Savings).
- Night racing events would be scheduled to start at 6pm and end at 10pm.
- The number of total racing events at RRR will remain at approximately 45 publicly available races per year.
- The Applicant is **not** seeking approval for racing events that transition from day time to night time.
- Proposed night racing events will be structured as follows:
  - Up to 12 Minor events (Up to 10,000 patrons).
  - Up to 4 Medium events (10,001 to 15,000 patrons).
  - **No larger night racing events are proposed.**
- The proposal includes the installation of new trackside lighting (new light poles) and the upgrade to the existing Spectator Precinct lighting (new lamps will be mounted on existing poles to improve safety).
- The proposed night racing will **not** result in a net increase in the number of racing events per year at RRR. Night racing events will inevitably result in fewer larger scale day time racing events.
- The proposed night racing events are to be managed in accordance with the revised Draft Event Operational Management Plan (EOMP).
- A critical mitigation measure proposed to minimise traffic and noise impacts on Doncaster Avenue is for the Gate 18 (Ascot Street) exit to be closed to all pedestrians and most vehicles after 8pm for night racing events. Pedestrians, taxis and Ubers will be required to enter and exit via Gate 1 Gate 1 at Alison after 8pm.
- The proposed lighting design implements cutting edge technology to mitigate light spill. The highest level of light spill outside the racecourse is 21.48 lux, which is well below the maximum permitted of 110 lux for properties within 50 to 100 metres from the site.

Updated Justification and Evaluation

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 DPE. 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 and impacts on existing significant trees 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 revised Draft 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.
- The proposal will generate 191 construction jobs and 250 operational jobs at RRR.

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 relevant matters, there will be no additional environmental impacts as a result of the proposed refinements and clarifications. The refinements include additional measures to ensure any previously known and assessed impacts will be appropriately managed and mitigated where relevant. On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

1. INTRODUCTION

1.1. PURPOSE OF THIS REPORT

This Response to Submissions Report (**RTS**) has been prepared on behalf of Australian Turf Club (**ATC**) to address the matters raised by government agencies, the public and community organisation groups during the public exhibition of the proposed State Significant Development (**SSD**) application SSD-8706 for Night Racing at Royal Randwick Racecourse (**RRR**) (**the site**).

SSD-8706 was publicly exhibited by the Department of Planning, Industry and Environment (**DPE**) from Wednesday 26 May 2021 to Tuesday 22 June 2021.

Subsequently, DPE issued a letter to the applicant on 23 June 2021 requesting a response to the comments raised during the public exhibition period for SSD-8706. In addition, DPE issued a request for additional information on 17 August 2021, 3 December 2021 and 24 December 2021.

This RTS provides an initial analysis of the submissions received, outlines further consultation with stakeholders which have occurred following public exhibition, a formal response to submissions and an overview of further information provided to support the project, which final approval is sought for.

Ultimately, the original content of the proposal has been retained, with additional detail and clarified mitigation measures developed through further consultation with stakeholders including DPE, Randwick City Council (**Council**) and Transport for NSW (**TFNSW**). It is considered that this additional information can be used to finalise the assessment of SSD-8706.

1.2. EXHIBITED PROJECT

SSD-8706 seeks approval for night racing at RRR and works to prepare the site for its operation, as listed below:

- 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.

Upon receipt of submissions and consultation with key stakeholders, there are generally no changes required to the scope of the proposal. Notwithstanding, further information and changes to mitigation measures have been incorporated to respond to matters raised in submissions.

It is noted that subsequent to further information provided by the Arboricultural Assessment (**Appendix K**), the scope of proposed works is to be revised to seek approval for:

- the removal of one tree and tree pruning.

Justification for this change is provided in **Section 4.3.7.1**.

1.3. SUPPORTING DOCUMENTATION

This Submissions Report is supported by the following technical reports and documentation.

Table 2 Supporting Documentation

Appendix	Report	Prepared By
Appendix A	Submissions Register	Urbis
Appendix B	Updated Mitigation Measures	Urbis
Appendix C	Site Plan	Urbis
Appendix D	Noise Assessment – Response to Submissions	GHD
Appendix E	Traffic Assessment – Response to Submissions and Traffic Management Plan	PTC
Appendix F	Lighting Assessment – Response to Submissions	IGS
Appendix G	Biodiversity Impact Statement – Grey-headed Flying-fox	Cumberland Ecology
Appendix H	Revised Draft Event Operational Management Plan	ATC
Appendix I	Archaeology Assessment – Response to Submissions	Urbis
Appendix J	Built heritage Assessment – Response to Submissions	Urbis
Appendix K	Arboricultural Assessment	Bradshaw Tree Services
Appendix L	Typical trackside light pole Elevation Plan	Musco

2. ANALYSIS OF SUBMISSIONS

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

2.1. BREAKDOWN OF SUBMISSIONS

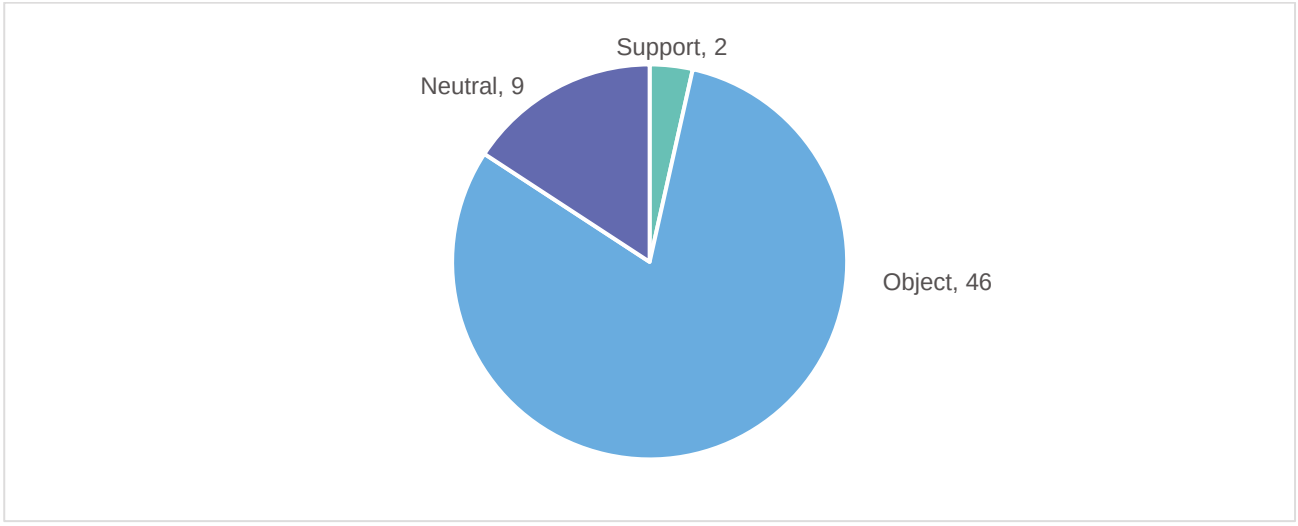
The SSDA was publicly exhibited between Wednesday 26 May 2021 until Tuesday 22 June 2021. In total, 57 submissions were received. 45 of these submissions were from the public, five were from organisations and seven were from public authorities.

All submissions were managed by DPE, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-8706).

A breakdown of the submissions made by group and issues raised is provided in **Table 2**. In addition, the submissions are presented in **Chart 1** and **Chart 2**.

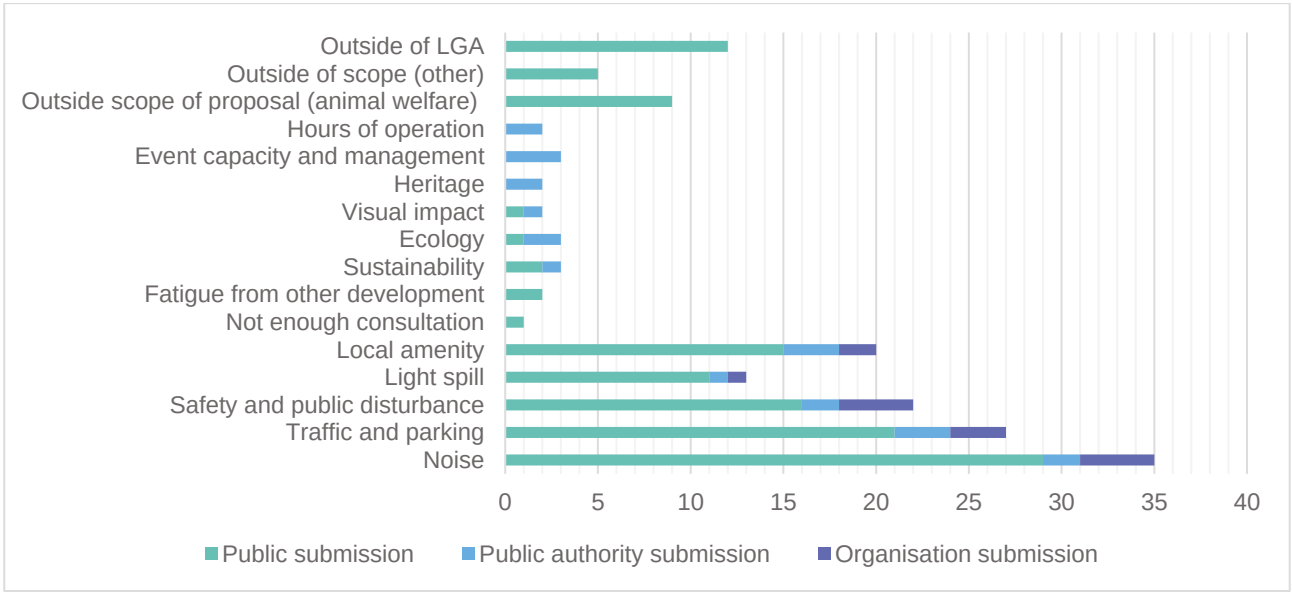
Overall, two submitters supported the project and 46 objected to the project based on the submissions received. Nine submitters (including public authorities) provided neutral comments.

Chart 1 Overview of submissions support



Source: Urbis

Chart 2 Overview of submissions



Source: Urbis

Table 3 Breakdown of Submissions Received

Submitter	**Category of Issues Raised**						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Public Authorities (State or Commonwealth Agencies and Council)							
TFNSW	1			1			
Heritage NSW				1			
DPE – Biodiversity and Conservation Division				1			
Centennial and Moore Park, Parramatta Park and Western Sydney Parklands Trust				1			
Randwick City Council	1	1	1	1	1		
Organisations							
Strata Committee SP 21408				1			
Keep Sydney Beautiful - Coogee				1			
Doncaster Avenue Residents Group				1			

Submitter	Category of Issues Raised						
	The Project	Procedural Matters	Impacts			Justification and Evaluation of the Project	Issues Beyond the Scope of the Project
			Economic	Environmental	Social		
Coogee Bay Precinct Members				1			
Strata Plan 55999				1			
Individuals – (Local <5km)	2	2		33	15	5	9
Individuals (Regional >5km)						2	12
TOTAL	4	3	1	43	16	7	21

2.2. CATEGORISING KEY ISSUES

In accordance with the DPE *State Significant Development Guidelines,* the issues raised in the submissions have been categorised in the following table, as outlined in **Table 2** and **Chart 2**.

Table 4 Categorising Issues Raised

Category of Issue		**Summary of Matters Raised**
The project	The site	Some submissions identified the site is located within a residential area and that the proposed development would create increased impacts on residents.
	The project area	N/A
	Physical layout and design	DPE requested further detail on the Site Plan and an Elevation Plan of a typical trackside light pole.
	Key uses and activities	Some submissions identified the existing use of the site for racing events creates land use conflicts and that the proposal would increase those impacts.
	Timing	Two submitters identified they are exhausted by disruption from development in the area, referencing construction and operational disruption from Sydney light rail and construction of new development in the area. They are concerned the night racing will cause further disruption.
Procedural matters	Level or quality of engagement	One submitter claims the level of public engagement was insufficient.
	Compliance with the SEARs	N/A
	Identification of relevant statutory requirements	N/A
Economic, Environmental and Social Impacts	Noise	Concerns of noise impacts was the most frequent issue raised in submissions. This included concerns related to noise from the running of events, such as from loudspeakers, music and general noise from patrons during races. Other concerns related to noise from patrons exiting the event at the end of a night and causing excessive noise (also referenced in public disturbance); and noise from proposed diesel generators.
	Traffic and parking	Concerns of traffic impacts was the second most frequently referenced issue in submissions. This related to impacts on traffic congestion in rush hour, patrons parking in residential streets and residents having nowhere to park, and disruption from traffic exiting the racecourse into the Doncaster Avenue Precinct (land located between RRR to the east and Anzac

Category of Issue		Summary of Matters Raised
		Parade to the west) late at night. Council's submission also raised concerns on potential operational limitations of the Ascot Street/ Doncaster Avenue intersection, which Council plans to soon upgrade with a cycle lane and signalised intersection. Other concerns raised by Council and TFNSW included operational management, requirement for wayfinding, Traffic Management Plan and mitigation measures to encourage patrons using public transport to minimise impacts on road network capacity.
	Safety and public disturbance	Closely linked to concerns of noise; safety and public disturbance was the third most frequently referenced issue in submissions. Residents raised concerns of anti-social behaviour from intoxicated people entering the Doncaster Avenue Precinct following events at RRR.
	Local amenity	Some submissions identified concerns that the proposal has potential to impact on residential amenity, quality of life and property values in the area.
	Event capacity and management	Some submissions from public, Council and TFNSW sought further information on the scale, frequency and management of night racing events. Council also requested clarification as to whether combined day and night time racing events are being proposed.
	Hours of operation	Council, TFNSW and NSW Police requested clarification on the hours of operation, including what time night racing events would end, what mitigation measures would be in place if the end of the event is extended due to racing delays in extenuating circumstances, and what management measures will be put in place to minimise the risk of all patrons leaving the site at one time.
	Lighting design (including light spill and visual impact)	Light spill was referenced in submissions from the public, public authorities and other organisations. Concerns were primarily related to potential impacts on adjoining residential properties. Some submissions suggested the proposed light poles may create visual impact. Council suggested the light poles be painted in a dark colour, rather than being galvanised steel.
	Sustainability	Some submissions were concerned about the proposed use of diesel generators to generate power for the lighting and suggested there should be investigation into lighting being connected to the energy grid. Council also suggested alternative renewable energy sources.

Category of Issue		Summary of Matters Raised
	Ecology	Council identified concerns that the proposed lighting may impact on the grey headed flying foxes that camp at Centennial Park. Council also requested additional information regarding the protection of trees and requested an Arboricultural Impact Assessment.
	Heritage	Further information related to Aboriginal archaeology, European archaeology and Built heritage was requested by Council and the Heritage NSW.
Justification and evaluation of the project	Consistency of project with Government plans, policies and guidelines	Some submissions claimed the project should not be a state significant development and is not in the public interest. Another submission claims that the proposed use of the site is inconsistent with the precinct objectives, being within a dense residential area and the Kensington and Kingsford corridor.
Issues beyond the scope of the project or not relevant to the project	Animal welfare	Nine public submissions were made related to concerns of animal welfare.
	Others	Five submissions referred to other matters outside of scope of the proposal, including religious beliefs, a development application for skydiving at RRR (approved), the racing industry, and over development in NSW.

In addition to the submissions received during public exhibition, it is acknowledged that DPE requested additional information on 17 August 2021 for the following matters:

Table 5 Summary of RFI requirements from DPE

Issue	Summary	Reference
Traffic and Parking	▪ Existing traffic flow ▪ Mode Share ▪ Traffic arrival period ▪ Site access ▪ Cyclist impacts ▪ Traffic impact ▪ Car parking ▪ Green travel plan	Refer to **Table 8** in **section 4.3.2** and **Appendix E**
Lighting	(a) Threshold increment calculations shall be carried out for all surrounding roads. (b) It is noted that the lighting modelling was carried out by the supplier/manufacturer with their proprietary software.	Refer to **section 4.3.4** and **Appendix F**

Issue	Summary	Reference
	Independent calculations shall be carried out by a third-party consultant using an industry standard software rather than the manufacturer's proprietary software. (c) A light spill impact assessment on the Grey Headed Flying Fox roosting colony located in Centennial Park shall be carried out.	
Acoustic	Clarification on acoustic assessment and noise monitoring.	Refer to **section 4.3.1** and **Appendix D**
Patron Management	Concerns are raised regarding the management of patrons arriving and departing the night racing events, including: ▪ pedestrian safety and increase in traffic delays from patrons crossing Alison Road, Ascot Street and Doncaster Avenue ▪ potential amenity impacts on the surrounding residential area, from patrons leaving the racecourse. The above concerns including those raised by Council, NSW Police and in public submissions regarding the management of patrons shall be addressed.	Refer to **section 4.3.3, section 4.3.5, section 4.3.10 and section 4.3.11** and **Appendix H**
Biodiversity Assessment	An assessment of the potential impacts of the proposal on flora and fauna, including any potential lighting impacts on nocturnal fauna in accordance with the Biodiversity Conservation Act 2016 must be provided.	Refer to **section 4.3.7** and **Appendix G**
Sustainability	Further consideration of ecological substantiable development initiatives shall be considered. In particular, concerns are raised about the use of diesel generators to power the trackside lighting. Trackside lighting should be powered by mains electricity and include energy efficient lighting.	Refer to **section 4.3.6** and **Appendix F**
Architectural Plans	Provide an architectural drawing package including site plan showing location of lighting columns and luminaires, and detailed drawings of lighting columns within the Spectator Precinct and Trackside.	Refer to **section 3.2.1** and **Appendix C**
Operational and construction jobs	Confirm the number of additional operational jobs and construction jobs that would be created by the proposal.	The proposal will generate 191 construction jobs and 250 operational jobs at RRR.
Protection of significant trees	As recommended by Council, the RTS shall include the submission of an Arboricultural Impact Assessment to ensure the proposal will not result in unacceptable impacts to Council's Register of Significant Trees.	Refer to **section 4.3.7.1** and **Appendix K**

3. ACTIONS TAKEN SINCE EXHIBITION

In response to the key issues raised within the submissions, minor refinements to mitigation measures and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised in public authority, organisation and public submissions outlined in **Section 2**.

3.1. FURTHER ENGAGEMENT

Since the public exhibition of the SSDA, the Applicant has undertaken further consultation with DPE, TFNSW and Council. This further consultation is summarised as follows:

- Further engagement with DPE has been undertaken through July to October 2021 to clarify key items related to traffic, noise and lighting assessment.
- Further engagement with DPE has been undertaken through July to November 2021 to clarify key items related to lighting. This includes meeting with DPE and its independent lighting consultant to clarify the lighting modelling undertaken by the Applicant to assess potential light spill and mitigation measures. Additional information has been provided directly to DPE in October and November 2021 for clarification prior to the submission of this RTS.
- The Applicant consulted with TFNSW on 24 September 2021 to discuss its submission made during the exhibition period and confirm the appropriate methodology to satisfy TFNSW's requests. The Applicant proposed additional traffic management measures to help control the demand for transport and minimise impacts on traffic and transport operations within the Randwick Precinct.
- Subsequent to the meeting with TFNSW, a joint meeting was held with TFNSW, DPE and its independent traffic consultant to discuss mitigation measures to satisfy concerns related to traffic and pedestrian management on Alison Road and the intersection of Ascot Street/ Doncaster Avenue. A key outcome was the preparation of a Traffic Management Plan to clarify how mitigation measures will be implemented. Refer to **Appendix E**. DPE, TFNSW and Council also accepted that the existing traffic modelling was acceptable for assessing traffic impacts of the proposal and no further traffic modelling was required.
- Further to the meeting with DPE and TFNSW, the Applicant met with Council to discuss its submission. Key matters discussed related to operational hours, clarification on the number of events, lighting, traffic and transport management, and minimising impact on surrounding residents from lighting, noise and parking. Many of the items discussed have been considered and addressed within the revised draft Event Operational Management Plan (**OEMP**).

3.2. REFINEMENTS TO THE PROJECT

The following table summarises the minor clarifications proposed since public exhibition and in response to submissions made, and as a result of further engagement with key stakeholders.

Importantly, these clarifications fit within the limits set by the project description. These refinements do not change what the application is seeking consent for, and therefore an amendment to the proposal is not required.

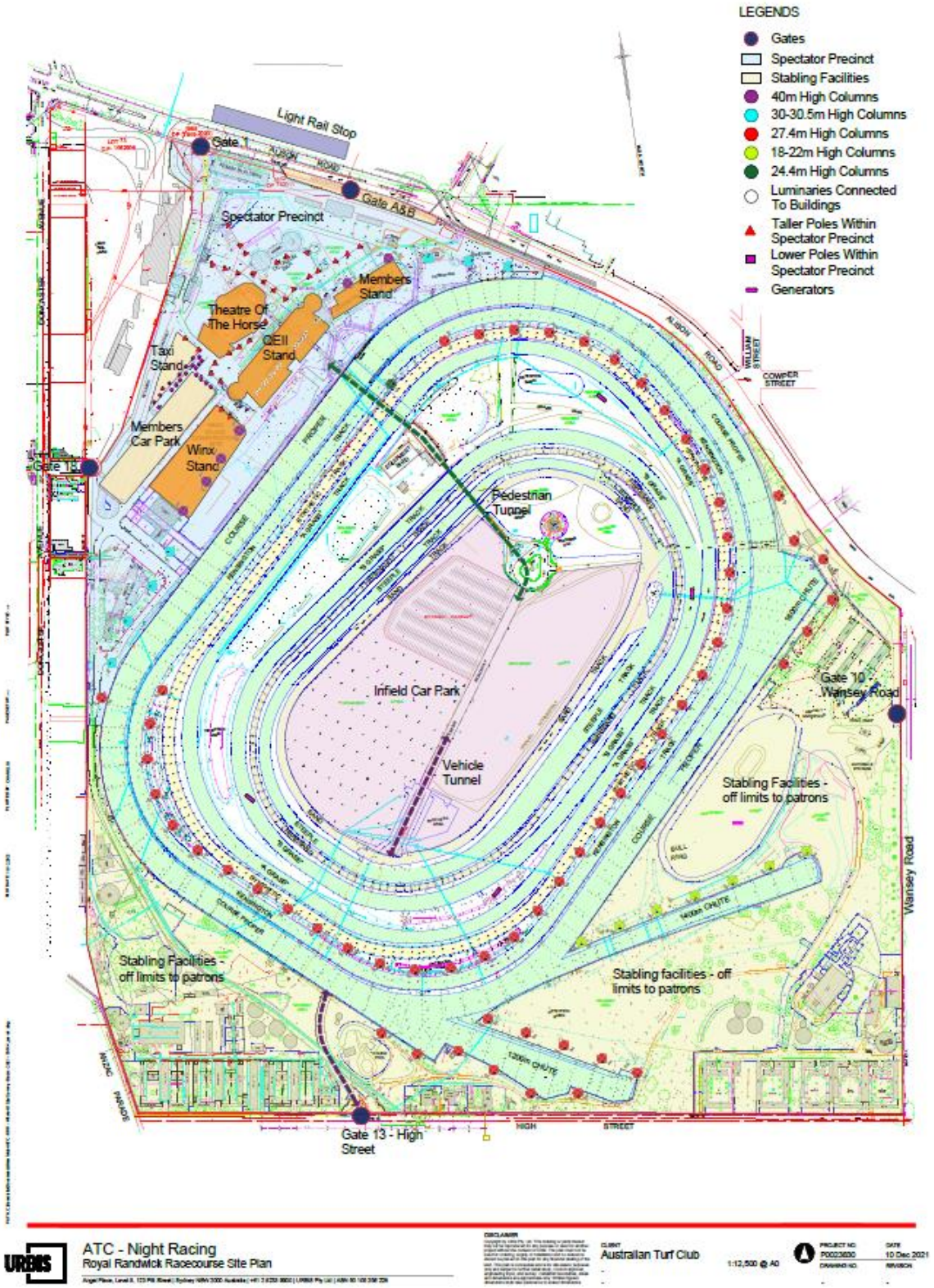
Table 6 Clarifications to the Proposed Development

Location	Clarifications
Noise	The proposed noise mitigation measures within the exhibited SSDA included the requirement for the Ascot Street/Doncaster Avenue entrance to be closed to pedestrians and taxis after 8pm during night racing events. It is clarified that this mitigation measure remains to manage amenity impacts on Doncaster Avenue. The acoustic consultant clarified that the noise modelling remains consistent with the required noise limits as based on LAeq, as opposed to LAmax. The recommended levels were –A-weighted sound pressure level at the nearest receiver –60 dBA (LAeq(5 minutes))–C-weighted maximum sound pressure level at the nearest receiver –80 dBC (LAeq(5 minutes). Based on a review of the latest information related to noise impacts from sporting events, GHD agrees that the above criteria are appropriate to minimise impacts to the surrounding community.
Traffic	TFNSW and Council accepted that the existing traffic modelling was acceptable for assessing traffic impacts of the proposal. It was also accepted that mitigation measures and traffic management is critical for the project. As such, a Traffic Management Plan is required to be formalised with TFNSW prior to the issue of a construction certificate. The traffic and pedestrian mitigation measures proposed within the exhibited SSDA included the requirement for the Ascot Street/Doncaster Avenue entrance to be closed to pedestrians and taxis after 8pm during night racing events. It is clarified that this mitigation measure remains to manage traffic impacts and other amenity impacts on Doncaster Avenue. Additional variable message signs are proposed to notify the public of upcoming night racing events and other traffic management operations/ wayfinding, as requested by TFNSW and Randwick City Council.
Lighting	The lighting assessment has been reviewed and additional modelling detail has been provided to DPE to clarify that the proposed lighting design will result in minimal light spill, at a level that is well within the acceptable limits of Australian Standards AS4282:2019. It is noted that the Spectator Precinct Lighting upgrade will not require new light poles to be installed. All lighting upgrades proposed within the Precinct will be subject to new lamps being installed on existing light poles and mounts. An ecological study has been undertaken to confirm that the proposed lighting will have no adverse impact on grey headed flying foxes that camp at Centennial Park and/or migrate in the area.
Heritage	Additional assessment has been undertaken to confirm that the proposed development will have no adverse impact on built heritage, Aboriginal cultural heritage, or archaeological heritage.
Trees	An Arboricultural Assessment has been undertaken to review the location of light poles and identify and potential conflict with existing trees. The assessment confirms there will be no adverse impacts on existing trees, although three trees are recommended for minor relocation (relocation of less than 2 metres) to minimise any impacts.

3.2.1. Revised Site Plan

Refer to the revised Site Plan (**Appendix C**) for further details on the layout of the site and proposed light poles. The Site Plan should be reviewed concurrently with the technical Lighting Plans provided as **Appendix F1** of the EIS.

Figure 1 Site Plan



Source: Urbis

The Site Plan identifies the following:

- Location of the Spectator Precinct.
- Stabling Facility areas that are for operational staff only. Patrons are prohibited from these areas.
- Location of the Infield Car Park and associated vehicle and pedestrian tunnels.
- Key structures within the Spectator Precinct including the Queen Elizabeth II (QEII) Grandstand, Members Stand, Winx Stand and the Members Car Park.
- Location of key access points at Gate 1; Gate A and B; Gate 13 High Street; and Gate 18 Ascot Street
- Location of proposed racetrack lighting and upgraded Spectator Precinct lighting, including height of poles for proposed racetrack lighting (refer to technical Lighting Plans provided as **Appendix F1** of the EIS). The specific design of each light pole for the proposed racetrack lighting will be finalised during detailed design stage post approval. As such, it is recommended that a condition of consent is applied that will require the dimensions and details of the light poles and associated works prior to issue of a construction certificate. This will include detailed documentation showing the precise location of each pole to satisfy mitigation measures related to the avoidance of tree protection zones and significant structures.
- It is noted that within the Site Plan, the Spectator Precinct is annotated with “Taller Poles” and “Lower Poles”. Notwithstanding, these are to indicate existing light poles that will be retained but upgraded with new lamps to improve lighting and safety after dusk. There are no new light poles proposed within the Spectator Precinct.
- Location of proposed generators within the infield. The specific design of the generators will be selected during detailed design stage post approval. As such, it is recommended that a condition of consent is applied that will require detailed documentation with the dimensions and details of the generators and associated acoustic screening prior to issue of a construction certificate.

In addition to the Site Plan, an Elevation Plan of a typical racetrack light pole (an extract of this plan was provided within the EIS) has been provided as **Appendix L**.

3.3. ADDITIONAL IMPACT ASSESSMENT

Additional assessments have been prepared to respond to the issues raised within the submissions. These include:

- **Traffic Management Plan**
  - Prepared to inform the management of traffic and pedestrian access for the proposed night racing events.
- **Ecological Assessment**
  - Prepared to assess the potential impacts on the grey-headed flying foxes roosted at Centennial Park.
- **Arboricultural Assessment**
  - Prepared to assess the potential impacts of proposed light poles on existing significant trees within the site.

The findings and recommendation of the additional assessments are discussed in detail within **Section 4** of this report.

4. RESPONSE TO SUBMISSIONS

This section provides a detailed summary of the Applicant's response to the issues raised in submissions. The response has been structured according to the categorisation of issues outlined in **Section 2**.

4.1. THE PROJECT

Key Issue:

Some submissions identified the site is located within a residential area and that the proposed development would create increased impacts on residents.

Response:

The proposed night racing utilises the existing Royal Randwick Racecourse, that has been used for horse racing for over 150 years. The site is the premier racing venue in NSW and a key part of the Applicant's business is aimed at fully utilising the Royal Randwick Racecourse site and facilities; and to provide the best venue and events for sustaining the sport in Sydney.

Notwithstanding, the Applicant respects the site is located adjacent to residential areas including the Doncaster Avenue Precinct, residential areas along Alison Road and Wansey Road, the nearby Kensington and Kingsford centres and UNSW. The Applicant also acknowledges the local community's fatigue from development in the area.

The Applicant has a long history of working closely with stakeholders, including Council, NSW Police, TFNSW and local residents to implement mitigation measures to minimise impacts from racing events on surrounding land uses. Community engagement is an important process that the Applicant implements to provide opportunity for the community to provide feedback or raise concerns. This includes community engagement completed in 2017 and 2021 to inform the preparation of SSD-8706 for proposed night racing. As part of the existing Event Operational Management Plan for day-time racing events, there are also measures available to report on concerns of disruption from events. The proposed draft Event Operational Management Plan (**EOMP**) proposes similar measures, along with additional monitoring of light, noise and patron management to maintain acceptable amenity for adjoining residential amenity.

Based on the above, the Applicant is committed to minimising its impacts on its neighbours during construction and operationally, and actively be a positive participant within the local community.

4.2. PROCEDURAL MATTERS

Key Issue:

The level of public engagement was insufficient.

Response:

The proposed night racing at Royal Randwick Racecourse has been in planning for over five years and the first round of community engagement was undertaken in October 2017. As detailed in section 5.2 of the EIS, this engagement included the following:

- **Stakeholder correspondence:** Written communication to key stakeholders in government and racing industry.
- **Letterbox drop to neighbours:** A notification and invitation to attend community drop-in events was distributed 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:** The FAQ sheet was distributed at drop-in events to provide answers to general questions about the proposal.
- **Community and stakeholder briefings:** Stakeholder briefings were undertaken in October 2017 to key stakeholder groups including the Randwick Precinct Committee (4 October 2017) and the Kensington and West Kingsford Precinct Committee (9 October 2017).
- **Community drop-in events:** Two community drop-in events (Wednesday 18 October 2017 and Saturday 22 October 2017) were held as a primary engagement activity to inform local residents and

other interested stakeholders about the proposed night racing and enable direct two-way communication with the project team.

- **Information and engagement collateral:** A PowerPoint presentation and project boards were produced and used during stakeholder events to provide an overview of the proposed night racing.
- **Alternative communication channels:** In addition to the above engagement methods, a project email address, telephone number and online portal was made available for the community to provide feedback when suitable.

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:

- **Stakeholder correspondence and briefings:** Written communication was sent to key stakeholders including Randwick City Council, UNSW, Prince of Wales Hospital, 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.

The Applicant notes that 21 people attended the two drop-in events in October 2017, seven feedback forms were completed and ten emails or calls were received. Attendees who attended the drop-in events that provided details were all from the Kensington and Randwick area.

The range of views from those who provided feedback was diverse and many issues were taken into consideration to inform proposed mitigation measures. 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. Refer to section 5.3 of the exhibited EIS for additional information. This public support should be taken into consideration when reviewing the submissions received during exhibition.

Many of the issues raised in public submissions were also raised by key stakeholders including DPE, TFNSW and Council. All key issues raised in submissions were addressed with the key stakeholders following receipt of submissions, to enable a holistic and balanced response that collectively represents public interest.

In addition to the required public exhibition undertaken by DPE in 2021 pursuant to the *Environmental Planning and Assessment Act 1979* (**EP&A Act**), the Applicant has taken all reasonable steps to engage with the community and provide opportunity to comment on the proposal.

4.3. ECONOMIC, ENVIRONMENTAL AND SOCIAL IMPACTS

4.3.1. Noise

Key Issue:

Concerns of noise impacts was the most frequent issue raised in submissions. This included concerns related to noise from the running of events, such as from loudspeakers, music and general noise from patrons during races. Other concerns related to noise from patrons exiting the event at the end of a night and causing excessive noise (also referenced in public disturbance); and noise from proposed diesel generators.

> ***Resident submission 12***
>
> *"Noise – from car & bus 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. It is NOT acceptable to have this noise until 10pm on weeknight from such a large scale complex".*

Resident submission 15

"The noise from the racecourse is a huge issue for local residents, irrespective of what kind of event is occurring. This noise travels throughout the local streets. It is only tolerable during the day because residents know that it will end at night. If night events are allowed to occur, residents will be impacted when they are resting and sleeping. Many houses along the border of the racecourse are owned by families with young children, many of which go to sleep early. How is it fair for local residents to have to compete with noise levels from the racecourse in these circumstances?".

Resident submission 25

"The noise from the diesel generators to run the trackside lighting will be a constant annoying disruption for local residents".

Response:

GHD who prepared the exhibited Acoustic Assessment report and Noise Management Plan was commissioned to review all submissions related to noise. Submissions received related to noise impacts can be categorised into the following common concerns, as addressed in **Appendix D** and summarised in the following Table.

Table 7 Response to submissions summary - Noise

Issue	Response
Noise from patrons exiting the venue	There is a general concern from the community that the behaviour of patrons exiting the venue after an event will cause a public disturbance, with one of the major issues being noise impacts. There is a particular concern given this may occur during the evening (6pm to 10pm) and night-time periods (after 10pm as people leave the venue). The locations of concern are particularly Doncaster Avenue and Ascot Street, Kensington. As identified in Section 4.4 of the exhibited Acoustic Assessment report, the impacts of patrons and vehicles exiting the site following night racing events. Based on a finishing time of 10pm, it is noted that patrons and vehicles exiting the site may extend beyond 10pm. As such, the assessment concluded that following entry/exit points are to be utilised by patrons exiting on foot after 8pm, to minimise impacts on the surrounding residential communities: ▪ Gate 1 (Alison Road) – pedestrians and vehicles (excluding vehicles exiting the members car park, which will exit via Ascot Street) ▪ Gate A and B (Alison Road) – pedestrians using buses. **MITIGATION MEASURES** To clarify, Table 5-1 of the exhibited Acoustic Assessment report recommended the following mitigation measures in order to reduce the noise impacts from patrons exiting on foot: ▪ 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 8 pm. ▪ Patrons exiting on Alison Road should be directed by security towards public transport and areas away from residential receivers. Staff should be directed to monitor noise levels and ensure that patrons are departing in a quiet manner as to not impact the residents in the vicinity of the racecourse.

Issue	Response
	▪ Signage should be erected to inform the patrons to leave in a quiet and orderly manner and to consider the residential neighbours. The signage should also direct patrons to the correct exits. The exhibited Noise Management Plan has the following measures for site supervision following completion of the event: *At the completion of the event, security staff should ensure that all patrons are directed towards either the member's car park, the infield car park, or the exit gates on Alison Road. Security staff are to ensure that no patrons on foot exit the site via Ascot Street and Doncaster Avenue.* *Patrons exiting on foot should be directed towards the taxi rank or public transport. Should the patrons leave the area on foot, security or staff should be directing them to be doing so in a quiet and orderly manner. Should the patrons ignore the requests of security, and there is a high likelihood that residents will be impacted by the noise from the patrons, the police should be called to attend to the issue if security deem the noise from the patrons is significant.* *Security and staff shall also monitor the exit points of the member's and infield car park to ensure that all vehicles are leaving in an orderly manner.* **SUMMARY** Based on the clarification of information from GHD, including mitigation measures requiring patrons exiting on foot and most vehicles, including taxis to enter and exit via Gate 1 and Gate A and B on Alison Road, there are suitable measures proposed to minimise impacts on adjoining residents in the Doncaster Precinct from noise generated by patrons exiting the venue. As such, this issue raised in submissions has been responded to and is acceptable for approval.
Overall noise impacts from the operation of the venue	Many of the responses were concerned with the overall noise impact from the operation of the venue for proposed night racing events. The following sources of noise were raised as concerns: ▪ Amplified sound from the loudspeaker system ▪ Generators ▪ Staged events **NOISE FROM AMPLIFIED SOUND SYSTEMS** The Acoustic Assessment report addressed noise from two potential amplified sound systems: ▪ Permanent equipment located on site, mainly used for commentary of races and music between races. Speakers are located on the Queen Elizabeth II Grandstand facing the racecourse (south-west) and throughout spectator lawn areas ▪ Temporary equipment located in other areas of the site, such as the Theatre of the Horses at the rear of the Queen Elizabeth II Grandstand, used for post event music. To determine appropriate maximum noise limits for amplified commentary and music from the night racing events, a review of management plans for other inner-city

Issue	Response
	venues was undertaken. Based on the review, the following maximum noise limits were determined: – A-weighted maximum sound pressure level at the nearest receiver – 65 dBA – C-weighted maximum sound pressure level at the nearest receiver – 80 dBC ▪ Following an independent review undertaken on behalf of DPE, DPE suggested appropriate noise limits should be based on LAeq, as opposed to LAmax. The recommended levels were – A-weighted sound pressure level at the nearest receiver – 60 dBA (LAeq (5 minutes)) – C-weighted maximum sound pressure level at the nearest receiver – 80 dBC (LAeq (5 minutes)) ▪ Based on a review of the latest information related to noise impacts from sporting events, GHD agrees that the above criteria are appropriate to minimise impacts to the surrounding community. ***Permanent sound amplification equipment*** ▪ Noise monitoring of the permanent sound amplification equipment was undertaken during a representative Class 2 event (Colgate Optic White Stakes Day) on 16 September 2017, with an attendance of approximately 12,000 patrons. Based on this noise monitoring, and subsequent noise modelling, it was determined that the permanent sound amplification system could achieve the required noise limits. ***Temporary sound amplification equipment*** ▪ In addition to the permanent sound amplification equipment, amplified music in other areas of the racecourse was considered, which may include live music or DJ performances following completion of the races, in areas such as the Theatre of the Horses. These events would also be required to achieve the noise limits detailed above. ▪ Given the location of these events, it is highly unlikely that the noise limits would be achieved, and as such live music or DJ performances should not be held following completion of races at night racing events. ***DPE recommendation – permanent real time noise monitoring system*** ▪ GHD recommended a noise monitoring procedure to monitor noise from the night racing events to check compliance with the recommended noise limits, as detailed in the Noise Management Plan. This consisted of a reference measurement location in conjunction with roaming attended noise measurements. ▪ Subsequent to this recommendation, DPE's independent review suggested that a permanent real time noise monitoring system be set up to continually monitor and control front of house noise levels, and identify any potential noise exceedances without requiring an acoustic engineer on site. ▪ Implementation of a permanent real time noise monitoring system would add an additional level of confidence to the community that the noise limits are being achieved at the nearest sensitive receivers, and therefore minimise the impacts on the

Issue	Response
	surrounding community. GHD agrees that this system should be installed prior to the commencement of night racing, and details of the system are to be included in the Noise Management Plan. **SUMMARY** Based on the above, GHD has adopted the preferred noise limits under LAeq. These limits have been used to reassess the performance of permanent and temporary sound amplification equipment. It was determined that permanent sound amplification equipment achieves the required levels and is acceptable for use. However, temporary amplification equipment for live music or DJ performances following completion of races cannot achieve the required levels and should not be used following night racing events. GHD and the Applicant accepts DPE's recommendation to install permanent real time noise monitoring. It is acknowledged this will assist in maintaining compliance with noise levels for this proposal, and other existing operations on site.
	NOISE FROM GENERATORS The public and Council have raised concerns regarding the use of diesel generators for lighting towers. As discussed in Section 4.1.2 of the Acoustic Assessment Report, additional generators will be required to power the lighting for the night racing events. Council has raised concerns that the diesel generators are proposed within close proximity to residential properties. Based on the information provided to GHD, the nearest distance from one of the diesel generators and a residential receiver is approximately 110 metres. **MITIGATION MEASURE** To clarify, at the time of preparation of the acoustic assessment, the exact make and model of generator has not been selected. However, 800 to 1,200 kVA generators have been nominated. To be conservative and minimise the impacts on the community, the noise from the generators was assessed against the requirements of the Noise Policy for Industry (**NPI**). In lieu of background noise monitoring for the project, a conservative criteria of LAeq, 15 min 35 dBA was selected, which is the minimum criteria for the night-time period for an assessment against the requirements of the NPI. To achieve a resultant noise level of 35 dBA or less, a generator enclosed in a sound attenuated enclosure should be selected, with a maximum sound power level of 98 dBA. **SUMMARY** Based on the above assessment and implementation of the recommended use of sound attenuated enclosures, the installation of generators will not cause adverse impact on nearby sensitive receivers and is acceptable for approval.
	STAGED EVENTS As discussed above, amplified music in other areas of the racecourse was considered, which may include staged events, such as live music or DJ performances, following completion of the races.

Issue	Response
	Based on the assessment, it was determined that staged events should not be held during or after night racing events as there is a high likelihood that noise limits will be exceeded. **SUMMARY** Based on the above, the proposed development does not seek approval for staged events, live music or DJ performances following the completion of racing events. As such, this issue is entirely mitigated and the proposal is acceptable for approval.
Increase noise impacts from traffic	The community has raised concerns that the proposal will result in increased noise impacts from traffic as vehicles exit the site at the end of an event. There is particular concern given this may occur during the evening (6 pm to 10 pm) and night-time periods (after 10 pm as patron depart the venue) when residents may expect to experience peace and quiet. **MITIGATION MEASURES** To clarify, the exhibited Acoustic Assessment report recommended the following mitigation measures in order to reduce the noise impacts from vehicles: ▪ Vehicles (including taxis and ubers) will use the following exit points (as shown in the below figure): – Gate 18 (Ascot Street) – vehicle access to members car park – Gate 13 (High Street) – vehicle access to infield car park – Gate 1 (Alison Road) – vehicle access for taxi/uber ▪ In response to submissions and further reduce impacts on the surrounding community, in particular those on Doncaster Avenue and Ascot Street, Kensington, the following mitigation measures have been recommended: – Staggered entry times (staggered exit strategies are also proposed in the draft EOMP) – Promotion of car pooling – Police presence at major intersections, in particular Doncaster Avenue and Ascot Street – Discourage parking on local streets – Undertake a taxi arrangement study to review alternative access arrangements and management measures to significantly reduce impacts along Doncaster Avenue – Adopt a pedestrian, transport and traffic management plan – Posting of police at intersection of Ascot Street/ Doncaster Avenue during Class 2 events – 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 – 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

Issue	Response
	– Security should be located at Gate 13 to monitor the movement of traffic exiting the car park. Speed signs should be located throughout with a maximum speed of 10 km/h **SUMMARY** Based on the above, the proposed mitigation measures to direct most traffic through to Alison Road, rather than Ascot Street. Only vehicles exiting from the Members Car Park will be able to exit via Ascot Street. To mitigate noise disturbance from these vehicles, additional traffic management measures are recommended to minimise traffic impacts on sensitive receivers in the Doncaster Avenue Precinct. With the implementation of the recommended mitigation measures, potential impacts related to traffic noise are acceptable for approval.
Bump-in, bump-out activities	Randwick City Council has raised concerns regarding bump-in/bump-out noise impacts, in particular noisy activities such as waste collection and dismantling of structures occurring after completion of the event after 10 pm. GHD recommends that noise generating activities which have the potential to lead impacts on the community be reviewed prior to commencement of night racing. Should it be determined that these noise generating activities result in noise impacts on the community, it is recommended that these be delayed until the following day.

4.3.2. Traffic and parking

Key Issue:

Concerns of traffic impacts was the second most frequently referenced issue in submissions. This related to impacts on traffic congestion in rush hour, patrons parking in residential streets and residents having nowhere to park, and disruption from traffic exiting the racecourse into the Doncaster Precinct late at night. Council's submission also raised concerns on potential operational limitations of the Ascot Street/Doncaster Avenue intersection, which is shortly to be upgraded with a cycle lane and signalised intersection. Other concerns raised by Council and TFNSW included operational management, requirement for wayfinding, Traffic Management Plan and mitigation measures to encourage patrons using public transport to minimise impacts on road network capacity.

Resident submission 2

"Firstly, traffic congestion along Doncaster Ave and Alison Rd during the evening peak hour is already very heavy. With the addition of extra cars and commuters attending the racecourse, this would add greater strain to an already busy road network."

Resident submission 45

"The traffic conditions on roads nearby are already extremely congested. I occasionally commute for work via car from Kensington to Sydney's north western suburbs and know from first-hand experience that Kensington and Randwick roads are significantly more congested than the average across Sydney. Hosting night races at Randwick Racecourse would worsen the traffic conditions around Kensington and Randwick which are already highly problematic roads during peak hour and major events at the SCG."

Resident submission 30

"The lack of parking in the area is already an issue, with bike lanes, speed humps and landscaping reducing the number of spots available for locals."

Council submission

"Concerns are raised regarding the impact of private vehicle usage 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."

Response:

PTC who prepared the exhibited Traffic Impact Assessment report, was commissioned to review all submissions related to traffic. Submissions received related to traffic impacts can be categorised into the following common concerns, as addressed in **Appendix E** and summarised in the following Table.

Table 8 Response to submissions summary – Traffic and parking

Issue	Response
1. "Increased traffic" added to existing congestion	There is a general concern from the community that the current level of congestion on the local road network is frustrating and that additional traffic from the event will exacerbate the problem. "Issue 19, 20, 21 and 22" of Council's submission identifies concerns that the SIDRA modelling indicates that night racing events will 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. The Traffic Impact Assessment and SIDRA modelling prepared by PTC supports concerns that the current level of congestion is high. However, PTC confirms that the SIDRA modelling does not support concerns about the traffic impacts of the proposal. The current background traffic exceeds capacity when there are no events on at RRR, suggesting that the network is already exceeding capacity at some intersections (identified as LoS "F"), due to non-racecourse related traffic. Whilst the management of background traffic levels is universally considered the responsibility of the local authorities to upgrade the road network, PTC proposes specific traffic control/ management and/or the management of the mode share through the provision of additional transport options to minimise adverse impacts on the road network performance during night racing events. As addressed in section 3 of this report, the Applicant has met with TFNSW and Council to discuss appropriate mitigation measures. Proposed traffic mitigation measures and preparation of a Traffic Management Plan has been accepted by TFNSW and Council as the appropriate solution to this concern. A Traffic Management Plan is provided in **Appendix E**.

Location	LoS	Delay (sec) [1]	Highest DoS	Highest Q95% (Veh) [2]
Anzac Parade / Alison Road / Dacey Avenue	F	110.5	1.804	81.5
Alison Road / Doncaster Avenue	F	81.2	1.210	62.6
Alison Road / Racecourse, Gate 1	F	116.9	1.190	58.1
Alison Road / Darley Road	F	213.6	1.882	82.9
High Street / Racecourse, Gate 13 – UNSW	B	24.2	0.911	11.5
Anzac Parade / High Street	B	15.4	0.704	15.4
Anzac Parade / Doncaster Avenue	E	64.0	1.041	104.8
Doncaster Avenue / Ascot Street	D	48.5	0.4	1.0

[1] Council advised that removal of the roundabout at Doncaster Avenue / Ascot Street will be completed in 2021. Therefore, the new geometry has been used as the existing base for the intersection modelling.

[2] Resulting 95th percentile queue reported for the approach exhibiting the greatest vehicle queuing.

Issue	Response
	SUMMARY Based on the analysis by PTC and evidence provided, this demonstrates that the proposed development is not the root cause of some intersections operating beyond capacity and that through appropriate mitigation measures, potential impacts on traffic congestion can be managed.
2. Exacerbate existing lack of parking in local streets	Public submissions are referencing concerns related to shortage of on-street parking in residential areas surrounding RRR. However, comments received are comparing events and situations that are not related or comparable to the proposal. For example, existing parking issues are identified outside of event hours or with reference to weekend events, or loss of parking due to installation of cycle paths and landscaping – all of which are unrelated to the proposed development. "Issue 16, 17 and 18" of Council's submission also identifies concerns related to on-street parking shortages. Council claims the following: ***Issue 16*** *Concerns are raised regarding the impact of private vehicle usage 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.* ***Issue 17*** *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' produced significant issues, as most Sydney residents do not know when race 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.* ***Issue 18*** *If residents or their visitors are not aware of night race 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.* PTC confirms that an assessment of the parking provisions to support the proposed development was undertaken to support the exhibited Traffic Impact Assessment and confirms that the parking demand of 1,876 spaces can be adequately accommodated by the combined on-site parking provisions of 4,074 spaces (inclusive of the Members Car Park and Infield Car Park). PTC are unable to verify Council's concerns of patrons

Issue	Response
	parking on local streets. Notwithstanding, it is recommended that the issue be managed through enforcement of existing residential parking permits, particularly KN1, KN2, RA1, RA2, RA3, RA4 and RA5. **MITIGATION MEASURES** PTC confirms that all racing events (including daytime events and future night time events) are planned a year in advance through consultation with Racing NSW. As such, proposed night racing events will be planned with time for appropriate notification through several channels. To clarify, further mitigation measures are proposed to be implemented to reduce private vehicle trip generation, including: ▪ Establishing event-specific sustainable (green) travel plans in the lead up to events. ▪ Staggering arrivals by promoting early-bird parking prior to 5:00pm. Incentives may include premium parking, discounts on drinks, food or future tickets, etc. ▪ Promotion of car-pooling, with Premium parking for vehicles with 3+ passengers. ▪ Seeking to increase mode share of cyclists, providing improved on-site cyclist parking facilities, including bike-share facilities. ▪ Supporting increased shuttle services between hotels. ▪ Monitoring via patron surveys, to track travel trends and identify barriers and opportunities in public and active travel access. ▪ Regularly updating the website and wayfinding to incorporate changes in local travel infrastructure and timetables and seek opportunities to promote them. ▪ Continue organising additional event bus services and light rails services, to be coordinated within the MEOG. ▪ Provide notification to local residents prior to events, with details of the events, and contact details for enquiries.
3. Existing congestion along Doncaster Avenue during peaks	The Traffic Impact Assessment and SIDRA modelling prepared by PTC supports concerns that the current level of congestion is high along Doncaster Avenue during peak hours, including when there are no events on at RRR, suggesting that the network is already exceeding capacity at some intersections (identified as LoS “F”), due to non-racecourse related traffic. It is outside of the Applicant’s capacity to overcome this existing traffic constraints. Notwithstanding, the aforementioned active and public transport initiatives and travel demand management through the Traffic and Transport Management Plan (**TTMP**).
4. Congestion along Doncaster Avenue on race days	A public submission references concerns related to traffic congestion along Doncaster Avenue and surrounding streets during race events, caused by Ubers, taxis and private vehicles, making it difficult for local residents to leave or return home without encountering heavy traffic. From site observations by PTC during an Everest day-time event, it was noted that current performance at the Doncaster Avenue and Ascot Street intersection experiences

Issue	Response
	congestion due to taxis queuing through the intersection during the peak arrival time, which coincides with Saturday's peak midday network peak. It is expected that these conditions will be improved significantly during night racing events due to the comparative reduction of patrons from maximum 35,000 for day time events, to a maximum of 15,000 patrons for night racing events. Nevertheless, high traffic activity is expected where arrivals will coincide with the evening commuter peak if unmitigated. These associated potential impacts particularly relate to Class 3 events (<10,000 people), which is anticipated to be sustained for 1-2 hours, up to 12 events per year. **MITIGATION MEASURES** To clarify, the exhibited Traffic Impact Assessment report identified measures to mitigate congestion within the road network. It is recommended 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. This issue is recognised and the Applicant currently implements a Traffic and Transport Management Plan (TTMP) associated with day time events. A revised, draft version has been developed as part of this response and is provided in **Appendix E**. The provision of a draft TTMP satisfies TFNSW and Council's requirements for details of traffic management measures to minimise impact on traffic and transport operations within the Randwick Precinct. The draft TTMP will require consultation with TFNSW and the Sydney Light Rail Operation and be endorsed by TFNSW, prior to the issue of a relevant Construction Certificate. It is also noted that the impacts of the Class 3 and Class 2 events on the upgraded priority intersection of Doncaster Avenue / Ascot Street are significant with worse delays and queues. This is particularly due to the high flow of vehicles along Ascot Street during the events and the vehicles entering the Racecourse 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. As such, the proposed mitigation measure to only allow taxis/uber to enter and exit the site via Gate 1 (Scenario 2) will improve the performance of the intersection significantly. **SUMMARY** Mitigation measures are proposed to redistribute vehicle movement associated with night racing events away from Doncaster Avenue/ Ascot Street intersection, and for taxis, Ubers and most other vehicles to enter and exit the site from Gate 1 after 8pm during night racing events. Public transport is also to be promoted to reduce reliance on private vehicles and pressure on the road network during peak hours. These mitigation measures are detailed in the exhibited Traffic Impact Assessment report and the TTMP. It should also be noted that the proposed night racing events will not result in an increase in number of race days per year. This inadvertently means that some day time events that can be up to 35,000 patrons, will be scaled down to a night racing event with 10,000 to 15,000 patrons, resulting in a net reduction in traffic impacts associated with the racecourse. Based on the above clarifications, concerns related to congestion along Doncaster Avenue on race days is eased and subject to the proposed traffic mitigation measures being implemented, the proposal is acceptable for approval.
5. Increased pedestrian	There is a general concern from the community that the increased pedestrian activity arriving and leaving the event will cause a public disturbance. There is particular concern

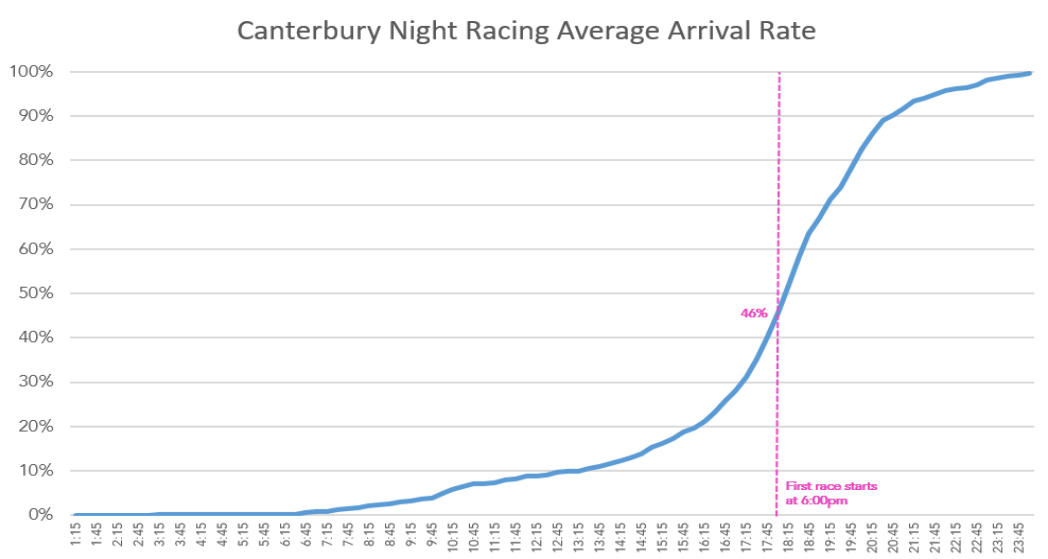
Issue	Response
activity during events/ public disturbance	given this may occur during the evening (6pm to 10pm) and night-time periods (after 10pm as people leave the venue). The main locations of concern are Doncaster Avenue and Ascot Street, Kensington. The impacts of patrons and vehicles exiting the site following night racing events at the site is addressed in the proposed operational management of the events and is included in the TTMP. Based on a finishing time of 10pm, it is noted that patrons and vehicles exiting the site may extend beyond 10pm. As such, it was determined that the following entry/exit points were to be utilised by patrons exiting on foot to minimise impacts on the surrounding community: ▪ Gate 1 (Alison Road)– pedestrians and vehicles ▪ Gate A and B (Alison Road) – pedestrians using buses These entry/exit points are shown in the below figure.  **MITIGATION MEASURES** Based on submissions, the following proposed measures to improve conditions and reduce public disturbance are clarified, including: ▪ 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). ▪ Undertaking a taxi management study to review alternative access arrangements and management measures to significantly reduce impacts along Doncaster Avenue.

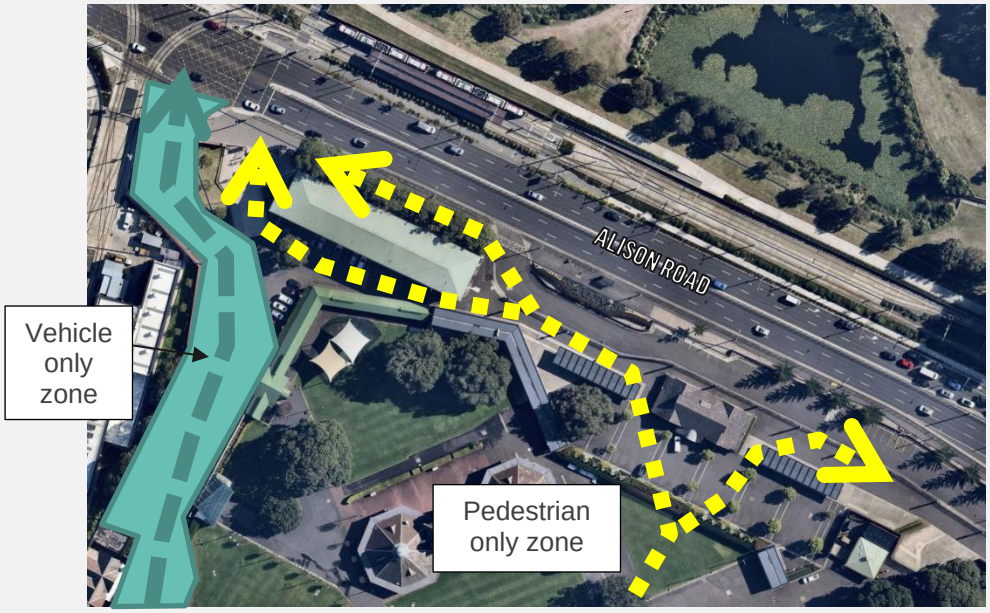
Issue	Response
	▪ Provide point duty police at the Ascot Street/ Doncaster Avenue intersection, to release queued traffic when required as part of event management and discourage illegal driver behaviour. **SUMMARY** Based on the above clarifications, concerns related to pedestrian activity and public disturbance along Doncaster Avenue on race days is eased and subject to the proposed traffic mitigation measures being implemented, the proposal is acceptable for approval.
6. Public transport capacity/ frequency	The comment received specifically related to service (bus) frequency. However, a review of the existing public transport infrastructure services and frequency indicates that the Racecourse is readily accessible in terms of public transport with regular bus services and the South East Light Rail (CSELR) providing a regular connection between the CBD and the Racecourse. Further, it is understood that RRR and TfNSW monitor patronage to determine if additional services are required to accommodate increased event patronage and react accordingly.
7. Authority comments	Comments from TFNSW and Council have been incorporated into the above. Responses to authority comments are addressed separately in further detail in **Appendix E**.

Further to the above response to submissions, the following **Table 8** provides clarification in response to Schedule 1, Item 1 of DPE's Request for Additional Information dated 17 August 2021.

Table 9 Response to DPE's Request for Additional Information – Schedule 1 (Traffic and Parking)

Item	Response
a) Existing traffic flow	DPE requested that updated traffic counts from early to mid-2021 should be sourced from TFNSW to confirm the suitability of the adopted traffic flows along Alison Road and Doncaster Avenue. As identified in **section 3**, the Applicant met with DPE, TFNSW and Council to discuss the requirement for additional modelling. During post submission consultation, DPE, TFNSW and Council accepted that no further traffic modelling is required as new modelling is unlikely to provide any new information than already understood regarding existing or projected traffic flows. Based on the above, no further action is required to satisfy this request for additional information.
b) Mode share	Based on the above, no additional modelling has been undertaken. To clarify, the mode share analysis is based on travel mode data collected through patron surveys undertaken at racing events of various scales in 2017. Section 7.2 of the exhibited Traffic Impact Assessment report prepared by PTC advises that the mode share used for the assessment of the proposal is derived from an average over multiple events of varying scale throughout the 2017 Autumn racing season. The Traffic Impact Assessment report acknowledges that the Everest event (35,000 patrons) is not representative of the scale of proposed night racing events (up to 15,000

Item	Response
	patrons). This comparison was made to identify the 'worst case scenario' impacts on the road network due to the higher capacity. Notwithstanding, PTC made comparison between the mode share for the Everest event (where private travel was approximately 25%) and the **average** across the surveys taken over the whole Autumn season (where private travel was approximately 32%). Based on the above, the traffic assessment has not used the Everest event as an accurate representation for travel behaviours for small evening events. Rather, PTC has utilised an existing mode share comparison to test its anticipated mode share surveys and then applied assumptions to project the mode share for night racing events (refer to section 7.3 of the exhibited Traffic Impact Assessment report). As part of its assumption, PTC identified a modal shift towards use of light rail. This assumption is justified since the light rail service became operational in 2020 and was unavailable during the surveys undertaken in 2017, and the light rail provides a direct service from Central and the CBD, to a light rail stop located opposite the entrance to Royal Randwick Racecourse. As indicated in mitigation measures for traffic and transport, the Applicant will be implementing strategies to encourage a higher proportion of night racing patrons to utilise public transport, including the light rail.
c) Traffic arrival period	DPE has requested clarification on the assumptions related to assessing the likely traffic arrival period for proposed night racing events. In section 7.4.1 of the exhibited Traffic Impact Assessment report, PTC undertook an assessment of traffic count and car occupancy survey during the Everest event held in October 2017. The data identified the travel patterns for vehicle movement throughout the event are tidal, indicating the greatest volume of traffic reached 700 vehicles over the hour leading up to the first race (11am – 12pm). This volume is not sustained for long with the quantity of vehicles movements falling sharply following the first race starting at 12pm. PTC notes that the data was for an event approaching 35,000 people and the new proposal for night racing will accommodate a maximum of 15,000 people during a Class 2 event. Notwithstanding, as demonstrated in item B, the mode share is anticipated to remain relative regardless of scale of event. 

Item	Response
	PTC's assumptions on peak traffic arrival in the hour leading up to the first scheduled race at a night racing event is supported by additional traffic surveys undertaken by PTC over three night racing events at Canterbury Racecourse in 2018 and 2019 (refer to chart *Canterbury Night Racing Average Arrival* Rate on previous page). This data was used to aggregate arrival rates and parking occupancies for night racing events and it identifies that 46 per cent of vehicles arrive before the first race. The graph also shows that the arrival begins early due to staff arrivals and patrons arriving in advance. The additional data from Night Racing at Canterbury supports PTCs assumptions that the travel arrival period for proposed night racing at Royal Randwick Racecourse will be concentrated in the hour leading up to the first race. This will minimise the impact on traffic during the peak rush hour period. As identified in the EIS, mitigation measures are proposed to encourage greater public transport mode share and early arrivals to further minimise impacts on traffic.
d) Site access	i. A Traffic and Transport Management Plan (**TTMP**) and revised Event Operational Management Plan (**EOMP**) have been prepared and submitted with this RTS, which provides guidance on how the ATC must consult with the NSW Police, TFNSW and Council to manage vehicle movements and pedestrian movement exiting onto Alison Road at Gate 1. The TTMP can deploy various measures including police and security management of vehicle and pedestrian movement to maintain safety and efficiency in the same or similar manner to TTMP used for day time events. It is noted that Gate 1 comprises of a vehicle accessway onto the signalised intersection with Alison Road, with a separate pedestrian exit onto the pedestrian crossing of the same signalised intersection. Patrons on foot will be directed through Gate 1 and A and B onto Alison Road in accordance with safety measures required in the TTMP.  ii. As required by the EOMP and mitigation measures identified in the Traffic Impact Assessment report, all taxis and ride-share vehicles will not be permitted to access the Ascot Street entrance and will be diverted to the Gate 1 entrance after

Item	Response
	8pm. Taxis and ride-share vehicles will still be permitted to access the Ascot Street entrance prior to 8pm, therefore minimising the impacts on Alison Road during peak hour traffic. iii. The signalised intersection at Gate 1 permits vehicles to turn right into the racecourse. As addressed under Item A in this table, the existing traffic modelling has been accepted and no further modelling is required. The Traffic Impact Assessment prepared by PTC uses the traffic modelling to indicates that the intersection of Alison Road and Gate 1 will experience marginal change in performance during Class 2 or Class 3 night racing events compared to existing traffic. As such, through the implementation of recommended traffic and pedestrian management measures through the TTMP, PTC considers the permitting of right turns into Gate 1 will have no significant adverse impact on the current level of service (LoS) of F on the Gate 1 intersection or broader road network.
e) Cyclist impacts	Section 7.6.2 of the Traffic Impact Assessment report prepared by PTC considered the impacts of the upgrade to the Doncaster Avenue and Ascot Street intersection from a roundabout configuration to a signalised intersection with a separated cycling lane. The analysis by PTC identifies concerns that the signalisation of the intersection is unwarranted and will impact on intersection performance with greater delays and queues. Notwithstanding, the upgrade of the intersection and installation of a cycle lane along Doncaster Avenue is outside of the Applicants control, the Applicant will utilise the recommended management practices proposed in the Traffic and Transport Management Plan (**TTMP**) and revised Event Operational Management Plan (**EOMP**) that have been prepared and submitted with this RTS. These Plans provide guidance on how the ATC must consult with the NSW Police, TFNSW and Council to manage vehicle movements and pedestrian movement at the Ascot Street entrance. The TTMP can deploy various measures including police and security management of vehicle and pedestrian movement to maintain safety and efficiency in the same or similar manner to TTMP used for day time events – and will utilise alternative traffic management measures after 8pm, to prohibit vehicles entering the site via Ascot Street. Through these traffic safety measures, potential risk of impact to cyclists travelling along Doncaster Avenue will be minimised.
f) Traffic impact	The traffic mitigation measures identified by DPE in Schedule 1 have been considered by the Applicant, however all are unfeasible. Particularly: ▪ The members car park contains only 574 car spaces and is unlikely to be used at capacity for night racing events. ▪ The recommendation to prohibit vehicles accessing the members car park and taxi/ride share rank prior to 6.30pm will unnecessarily concentrate traffic to Gate 1. The capability for vehicles to enter via Ascot Street will provide greater equal distribution across the road network. ▪ General admission patrons arriving via private vehicle will typically be required to park in the infield car park, accessed via High Street. ▪ Starting night racing events earlier (5pm) or later (7pm) are unfeasible. Racing events are required to be a minimum of four hours by Racing NSW, and therefore starting at

Item	Response
	7pm will require racing events to end at 11pm, which is considered unacceptable for maintaining residential amenity at night. Notwithstanding, following consultation with DPE, TFNSW and Council, a Traffic and Transport Management Plan (TTMP) has been prepared to clarify mitigation measures and required management protocols. Key mitigation measures proposed to be implemented to reduce private vehicle trip generation include: ▪ Establishing event-specific sustainable (green) travel plans in the lead up to events. ▪ Staggering arrivals by promoting early-bird parking prior to 5:00pm. Incentives may include premium parking, discounts on drinks, food or future tickets, etc. ▪ Promotion of car-pooling, with Premium parking for vehicles with 3+ passengers. ▪ Seeking to increase mode share of cyclists, providing improved on-site cyclist parking facilities, including bike-share facilities. ▪ Supporting increased shuttle services between hotels. ▪ Monitoring via patron surveys, to track travel trends and identify barriers and opportunities in public and active travel access. ▪ Regularly updating the website and wayfinding to incorporate changes in local travel infrastructure and timetables and seek opportunities to promote them. ▪ Continue organising additional event bus services and light rails services, to be coordinated within the MEOG. ▪ Provide notification to local residents prior to events, with details of the events, and contact details for enquiries.
g) Car parking	PTC confirms that an assessment of the parking provisions to support the proposed development was undertaken to support the exhibited Traffic Impact Assessment and confirms that the parking demand of 1,876 spaces can be adequately accommodated by the combined on-site parking provisions of 4,074 spaces (inclusive of the Members Car Park and Infield Car Park). PTC are unable to verify Council's concerns of patrons parking on local streets. Notwithstanding, it is recommended that the issue be managed through enforcement of existing residential parking permits, particularly KN1, KN2, RA1, RA2, RA3, RA4 and RA5. Notwithstanding, the Applicant will utilise aforementioned mitigation measures to encourage patrons to either utilise public transport or on-site parking.
h) Green travel plan	A Green Travel Plan for the site exists for the entire Royal Randwick Racecourse to satisfy a condition of consent for SSD-10285. It is recommended that any further information can be provided as a condition of consent for SSD-8706.

4.3.3. Safety and public disturbance

Key Issue:

Closely related to noise, safety and public disturbance was the third most frequently referenced issue in submissions. Residents raised concerns of anti-social behaviour from intoxicated people entering the Doncaster Precinct (land located between RRR to the east and Anzac Parade to the west) following events at RRR.

> ***Resident submission 15***
>
> *"On race days, member racegoers leave the course inebriated. They spill out onto the local streets and make a large amount of noise. As mentioned above, they also congregate in the side streets. For example, many racegoers congregate in the local dog park on Ascot Street. They do this to continue drinking, or whilst they wait around for their transport. In these circumstances, they make an incredible amount of noise. If this were to happen at night, it would adversely impact local residents trying to sleep and relax."*
>
> ***Resident submission 25***
>
> *"After the day time races patrons stagger past our homes drunk, abusive & vomiting in our gardens. This behaviour is bad enough during daylight hours, we should not have to tolerate it at night. The congregation of intoxicated patrons in the surrounding streets at the conclusion of the event is a safety issue with them staggering onto the roads in front vehicles trying to attract taxi's & Ubers. This will be exaggerated in the darkness & an innocent motorist may not be able to avoid a collision."*
>
> ***Council submission***
>
> *"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."*

Response:

The Applicant takes concerns of safety and public disturbance extremely seriously and works closely with NSW Police to minimise the impacts of patrons as they leave the venue. The Applicant is experienced in the management of the site during racing events and non-racing events ranging from 5,000 patrons to 52,000 patrons for signature carnival events. Each of these events, irrespective of size and category, require considerable resources to ensure they run smoothly, both internally and externally, whilst minimising impact and disruption to the surrounding areas.

Following receipt of submissions, the exhibited draft EOMP has been revised to provide additional information and clarification, particularly in regard to submissions on safety and public disturbance. The draft EOMP has been revised to provide greater detail on mitigation measures related to safety and public disturbance, and overlap with other matters discussed in section 4.3 of this report, including:

- Noise (**section 4.3.1**)
- Pedestrian, traffic and access management (**section 4.3.2)**
- Event capacity and management (**section 4.3.10**)
- Hours of operation (**section 4.3.11**)
- Revised Draft EOMP (**Appendix H**)

4.3.4. Lighting design

Key Issue:

Light spill was referenced in submissions from the public, public authorities and other organisations. Concerns were primarily related to potential impacts on adjoining residential properties.

Resident submission 15

"Having night events would create a large amount of light pollution for neighbouring properties. This would adversely affect the ability of locals to rest or sleep, and would also have impacts on local wildlife. Most other venues that have night lights and night events do not have residential properties immediately backing onto the racecourse, and have a buffer. This is not the case for local Kensington residents."

Resident submission 38

"The proposed light poles to be installed to allow night racing also represent an unacceptable level of light pollution. The suburb is already heavily light polluted after hours, and this will make things worse. Kensington is meant to be a suburban area, not an all night entertainment precinct like Kings Cross or Darling Harbour."

Resident submission 40

"This is a residential area and the "spill" light described will have a direct and significant impact on our living and sleeping spaces."

Council submission

"Consideration should be given to the potential impact on the nearby properties from the proposed upgrade of Spectator Precinct lighting."

Response:

IGS who prepared the exhibited Lighting Impact Assessment report was commissioned to review all submissions related to lighting. Submissions received related to lighting impacts can be categorised into the following common concerns, as addressed in **Appendix F** and summarised in the following Table.

Table 10 Response to submissions summary – Lighting design

Issue	Response
Light spill to neighbouring properties	There is a general concern from the community that there will be excessive light spill on adjoining residential properties, which will create adverse impacts on sleeping and relaxation. IGS clarifies that the Australian standard *AS/NZ 4282:2019 Control of obtrusive light effects of outdoor lighting*, was updated in 2019. The earlier version (1997) did not include lighting for television broadcasting. In consultation with professional bodies such as The Lighting Societies of Australia & NZ, Astronomical Society of Australia, planning bodies, local government & road controlling authorities, sets of limits were established. The standard now states acceptable limits for residential areas within the vicinity of sporting venues being illuminated for TV coverage. The proposed lighting installation at Randwick Racecourse meets those criteria as discussed in the following section. **MITIGATION MEASURES** As proposed in the exhibited EIS and supporting documents, additional mitigation measures are incorporated into the design to manage any perceived light spill or glare: ▪ Baffles, visors & shields fitted to luminaires

Issue	Response
	▪ Dimming between races ▪ Event notification In response to engagement with DPE and Council, an additional mitigation measure is proposed to monitor light levels. Included in the overall night racing lighting control system, light sensors will be placed inside the boundary of the racecourse at selected locations to rear of the Doncaster Ave & along Alison Rd. Lux levels would be taken prior to each event and data collected at each event to confirm the calculated levels have not been exceeded. The system will be designed in line with Australian Standards *AS/NZ 4282:2019* and *AS3827 Lighting system performance – Accuracies & tolerances*. **SUMMARY** Based on the analysis by IGS and evidence provided, the proposed development utilises cutting edge lighting technology and mitigation solutions to achieve minimal light spill onto adjoining properties well below levels required by Australian standards. As such, public concerns are noted, however, the proposed is considered acceptable for approval.
Light pollution, environmental effects and times of operation	As a continuation of the above concern, IGS clarifies the assessment standards for outdoor lighting under *AS4282:2019 Obtrusive effects of outdoor lighting*. To facilitate the assessment process and this RTS, IGS considered the worst case scenario by assuming if RRR were simply being evaluated for obtrusive light effects of a general lighting installation, **not** TV broadcasting. Based on this assumption, according to AS4282:2019 the site would be assessed as a high brightness district Zone A4 due to the ambient light conditions and regular levels of night-time activity in the area (refer to following table with red box), which comprises of R2 and R3 residential zones and B2 commercial zone. **ENVIRONMENTAL ZONES** **Zones** / **Description** / **Examples** A0 / Intrinsically dark / UNESCO Starlight Reserve. IDA Dark Sky Parks. Major optical observatories. No road lighting -unless specifically required by the road controlling authority A1 / Dark / Relatively uninhabited rural areas. No road lighting - unless specifically required by the road controlling authority A2 / Low district brightness / Sparsely inhabited rural and semi-rural areas A3 / Medium district brightness / Suburban areas in towns and cities A4 / High district brightness / Town and city centres and other commercial areas. Residential areas abutting commercial areas To verify the ambient lighting conditions in the area, lux readings were taken by an independent assessor at existing property frontages on Alison Road, High Street, Wansey Road, and Doncaster Avenue.

Issue	Response

Alison Road - Northern Properties Boundary

Vertical Illuminance (Lux) readings taken at residential property boundary													
1	2	3	4	5	6	7	8	9	10	11	12	Avg	Max
11.10	9.50	13.70	9.20	8.70	16.80	17.20	12.24	8.50	12.40	16.07	22.40	13.15	22.40

High Street - Southern Properties Boundary

Vertical Illuminance (Lux) readings taken at residential property boundary													
1	2	3	4	5	6	7	8	9	10	11	12	Avg	Max
6.64	3.88	4.97	0.94	2.57	2.19	1.92	2.24	1.68	4.41	2.72	7.39	3.46	7.39

Wansey Road - Eastern Properties Boundary

Vertical Illuminance (Lux) readings taken at residential property boundary													
1	2	3	4	5	6	7	8	9	10	11	12	Avg	Max
3.14	0.43	2.70	0.30	2.10	1.15	1.04	3.15	3.90	1.70	0.90	2.30	1.90	3.90

Doncaster Avenue - Western Properties Boundary

Vertical Illuminance (Lux) readings taken at residential property boundary													
1	2	3	4	5	6	7	8	9	10	11	12	Avg	Max
1.15	0.20	3.10	3.82	1.48	0.92	0.66	2.30	0.84	1.20	0.67	1.54	1.49	3.82

In summary of IGS advice in **Appendix F**, the following criteria are important to understand assessment of potential lighting impacts:

- The applicable column illuminance (i.e. correlates with human perception of light) is to designed to 1000-1400 lux.
- The closest sensitive receivers such as residential properties is located in a zone less than 100 metres from proposed lighting. This zone is referred to as TV1 (refer to following images).
- Based on the proposed design with an illuminance of 1000-1400 lux, the maximum lux permitted within TV1 zones for sports venues illuminated without time restriction is 110 lux.

MAXIMUM VERTICAL ILLUMINANCE NON-CURFEW LIMITS FOR SPORTS VENUES ILLUMINATED FOR TV COVERAGE

Zone	*D* m	Initial camera illuminance (E_c), lx							
		≤500	>500 ≤700	>700 ≤1000	>1000 ≤1400	>1400 ≤1900	>1900 ≤2500	>2500 ≤3200	>3200
TV1	>50 ≤100	40	55	80	110	150	200	260	330
TV2	>100 ≤200	8	10	15	20	25	35	45	55
TV3	>200 ≤300	3	4	6	8	10	14	18	22
TV4	>300	1.5	2	3	4	5	7	9	11

LEGEND:
E_c = initial (MF = 1) average illuminance to the camera
D = distance from the nearest part of the TPA (refer to AS 2560.1)

Issue	Response
	 ▪ The lighting modelling prepared by IGS and verified by DPE's independent lighting consultant indicates the highest level of 21.48 lux is found at the rear of the property of 124 Doncaster Avenue, which is closest to the racecourse boundary. This level is significantly less that the maximum 110 lux permitted in the TV1 zone. The lux levels continue to drop and diminish to imperceivable within 200 metres along Doncaster Avenue. ▪ IGS notes that topography, trees, fences and buildings were not including in the modelling. Therefore, these figures are the worst-case scenario as the path of light modelled is not obstructed. It is likely that the modelled lighting levels will have lessor impact in reality. ▪ IGS has also taken into consideration the 16 events per year will be held exclusively in the summer season when daylight saving is in place in NSW. Night racing meetings will be scheduled between 6pm & 10pm. This equates to 64 hours per season. However, as the lights will not be noticeable until dusk, between 7.20pm & 8.30pm as the season changes, the amount of time that the lights will be noticeable is approximately 34 hours per season. Races will be every 30 minutes for 5 to 7 minutes. As proposed in the exhibited EIS, the lights will be slowly dimmed over 5 minutes to 20% between races so the full brightness will be for only for 20 minutes per hour or 11.5 hours per season annually. As such, this further minimises potential lighting impacts on adjoining sensitive receivers. **SUMMARY** Based on the analysis by IGS and evidence provided, the proposed lighting complies with the most stringent AS4282:2019 requirements for sporting venue outdoor lighting.

Issue	Response
	Proposed mitigation measures as outlined previously, will further minimise any potential light spill impacts on adjoining sensitive receivers. As such, public concerns are noted, however, the proposed is considered acceptable for approval.
Pole size	Council's submission requested clarification on the proposed light poles design. IGS confirms that the poles will be made from galvanised steel, chosen as it is a recyclable material. The poles will be unpainted and will naturally dull over time through exposure. This will facilitate the poles receding in visual significance compared to painted poles. Pole heights are selected to enable the required illumination for television coverage of the horse racing events. The design has been carefully optimised to require the least number of poles, this provides the following benefits: ▪ Taller poles mean less poles are required as the luminaires (the part that emits light) can be aimed more downwards rather than horizontally. ▪ Less poles means the visual impact is reduced. ▪ Less poles also means less infrastructure and cabling is required throughout the site. The position of light poles has also been carefully optimised to avoid tree protection zones and conflicts with sensitive existing structures. The site is bounded by many mature trees around the site perimeter. These trees substantially reduce the view of the poles from around the site. In addition to Council's submission, DPE has requested clarity on the design of the light poles in the Spectator Precinct. As outlined earlier in this report, the Spectator Precinct Lighting upgrade will not require new light poles to be installed. All lighting upgrades proposed within the Precinct will be subject to new lamps being installed on existing light poles and mounts. The existing light poles that will be upgraded with new lamps are identified on the Site Plan as "Taller Poles" and "Lower Poles". **SUMMARY** The design and positioning of the proposed light poles has been carefully considered to optimise the minimum number of columns required, whilst balancing use of resources and minimising visual impact. As such, Council's concerns are noted, however, the proposed is considered acceptable for approval. It is considered that the above clarification satisfies DPE's concerns on the upgrade to light poles in the Spectator Precinct.
Sustainability	Public submissions and comments from Council has raised concerns over the use of diesel generators as an unsustainable solution. It is suggested that alternative means of generating power is investigated. The potential source of energy for the proposed lighting was considered by IGS during the design phase of the project. Whilst mains electricity would be preferred to diesel generation of energy in relation to sustainability, IGS confirms that an assessment of grid capacity demonstrated that there was a lack of available mains power capacity to the site.

Issue	Response
	IGS considered the inclusion of additional kiosk substations to the mains grid network. Should the Applicant wish to power the proposed lighting via mains grid network, a new high voltage feeder would be required from the zone substation, which would require intrusive and destructive works for cable laying relatively long distances. This would create undue disruption to the local community. In addition, the diesel generator solution would save the embedded carbon footprint associated with new cables, conduits, cable insulation as noise associated with any new high voltage infrastructure. IGS clarifies the diesel generators were also selected due to the low amount of use required, their low visual impact and to avoid impact on the local mains grid network at peak evening periods of energy demand (in summer evenings). Based on the above considerations, and that the lights are proposed to be used 16 events per year and that each event will require minimal operational hours per year, diesel generators were considered the most viable solution. **SUMMARY** In summary, the proposed use of diesel generators to power the proposed lighting was considered the most balanced outcome overall, as it represents the most suitable solution for the proposed use, without the disadvantages of a new high voltage feeder works. As such, concerns are noted, however, the proposed is considered acceptable for approval.

4.3.5. Local amenity

Key Issue:

Some submissions identified concerns that the proposal has potential to impact on residential amenity, quality of life and property values in the area.

> ***Resident submission 35***
>
> *"There will be deleterious impacts on the amenity of local residents if night racing is introduced - high wattage lighting and increased traffic will impact the local area."*
>
> ***Resident submission 38***
>
> *"Residents have the right to reasonable expectations of neighbourhood amenity. Turning our residential street into an entertainment precinct will severely affect the desirability, attractiveness and 'liveability' of Kensington."*

Response:

Comments from submissions on impacts of local amenity generally relate to potential impacts from traffic, lighting and public disturbance. These concerns overlap with other matters discussed in section 4.3 of this report, including:

- Noise (**section 4.3.1**)
- Pedestrian, traffic and access management (**section 4.3.2)**
- Event capacity and management (**section 4.3.10**)
- Hours of operation (**section 4.3.11**)
- Revised Draft EOMP (**Appendix H**)

4.3.6. Sustainability

Key Issue:

Some submissions were concerned about the proposed use of diesel generators to generate power for the lighting and suggested there should be investigation into lighting being connected to the energy grid. Council also suggested alternative energy sources, either via grid.

Resident submission 10

"The installation of a massive lighting system that relies on diesel generators is environmentally unsound. With the current concerns surrounding carbon emissions, it is amazing to see a proposal to install diesel generators in Sydney. It demonstrates that the proponent is not concerned about the environment, just profit."

Resident submission 38

"I have also read that the Australian turf club propose using diesel engines for power source for lighting. This is extremely selfish, inconsiderate and careless of them as diesel engines produce many harmful pollutants that increase the possibility of people getting cancer later on in life."

Resident submission 40

"This is a residential area and the "spill" light described will have a direct and significant impact on our living and sleeping spaces."

Council submission

"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."

Response:

Comments from submissions related to sustainability and the use of diesel generators is addressed in section 4.3.4. In addition, DPE has requested clarification on the use of efficient lighting. As exhibited, the proposed lighting luminaires will incorporate cutting edge, highly efficient LED technology to minimise energy consumption. As such, concerns are noted, however, the proposed is considered acceptable for approval.

4.3.7. Ecology

Key Issue:

Council identified concerns that the proposed lighting may impact on the grey headed flying foxes that camp at Centennial Park.

Council submission

"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."

"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."

"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."

Response:

4.3.7.1. Arboricultural assessment

The Applicant acknowledges Council's concerns regarding potential for proposed lighting columns impacting on existing significant trees and recommendation for an Arboricultural Impact Assessment to be undertaken as part of the SSD assessment and prior to the detailed design stage.

The EIS and supporting Visual and Landscape Impact Report prepared by Sturt Noble identified three lighting 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 Visual and Landscape Impact 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. For clarity, it is the Applicant's intention to avoid impacts on the identified significant trees and it was understood that this could be reasonably accommodated during the detailed design stage in coordination with a qualified Arborist.

Notwithstanding, to satisfy Council's request, Bradshaw Consulting Arborists (**BCA**) were commissioned to prepare an Arboricultural Assessment to inspect trees within the site that may have any potential impacts from the installation of light poles for the proposed night racing. Of the proposed 79 light poles, eleven light poles numbered A1, A11, A12, A13, C1, C4, C5, C6, C20, C23 and C24 are identified within proximity of existing trees. As such, only 20 trees identified where a proposed light pole transects with a TPZ were inspected and assessed to determine the health and condition of the trees and any potential impacts.

Light pole locations have been assessed by BCA based on the position shown on the Site Plan, noting that the location can be altered by 10% or 2 metres at detailed design stage. The following **Table 11** provides a summary of the assessment in **Appendix K**.

Table 11 Summary of arborist assessment

Tree/ light post	Assessment	Impact
Tree 1 Light Post A11	The position of the light post is approximately 8 metres from this tree. The light post is within the (Tree Protection Zone) TPZ of 15 metres and outside the SRZ(Structural Root Zone). The estimated impact to this tree is less than 10% and this conforms to the Australian Standard 4970-2009. As this is an assumption, exploratory excavation should be undertaken prior to construction to ensure that no major tree roots are severed for this project. Pruning of the canopy will be required to install the light post. It is likely less pruning will be undertaken, however the removal of the large limb pictured below will clear all vegetation from the light post position. The amount of foliage to be pruned is less than 4% of the canopy.	Low and acceptable impact. Minor pruning required.
Tree 2 Light Post A12	The position of the light post is approximately 12 metres from this tree. The light post is within the (Tree Protection Zone) TPZ of 15 metres and outside the SRZ (Structural Root Zone). The estimated impact to this tree is less than 10% and this conforms to the Australian Standard 4970-2009. As works are at the periphery of the TPZ, prior excavation to locate tree roots is not necessary.	Minimal and acceptable impact.
Tree 3 Light post A13	The position of the light post is approximately 16 metres from this tree. The light post is outside the (Tree Protection Zone) TPZ of 15 metres and outside the SRZ (Structural Root	No impact

Tree/ light post	Assessment	Impact
	Zone). There is likely to be no impact to this tree. As works are outside the TPZ, prior excavation to locate tree roots is not necessary.	
Trees 4 and 5 Light post C1	The position of the light post is approximately 17 metres from tree 4 and 14 metres from tree 5. The light post is outside the TPZ of tree 4 and at the periphery of tree 5. There will not be any impact to tree 4 and unlikely to be any impact to tree 5. As works are outside the TPZ or at its periphery, prior excavation to locate tree roots is not necessary. Tree 5 will require canopy pruning to accommodate the light structure.	No impact to tree 4. Minor pruning required for tree 5. Low and acceptable impact.
Tree 6 Light post C4	The position of the light post is approximately 4 metres from tree 6. The light post is within the TPZ of tree 6, yet outside the SRZ of this tree. This tree species is tolerant of tree root disturbance and the estimated incursion of a 2 metre hole 4 metres from the tree. The incursion is less than 10% and complies with Australian Standard 4970-2009. As tree root growth is unpredictable a tree root survey should be undertaken to identify any roots. Any proposed works must be outside the SRZ. Tree 6 will require canopy pruning to accommodate the light structure.	Low and acceptable impact.
Trees 7, 8 and 9 Light post C5	The position of the light post is approximately 5 metres from trees 7 and 8 and 12 metres from tree 9. The light post is within the TPZ of tree 7 and 8, yet outside the TPZ of the 9. There is unlikely to be any affect to tree 9 as works are outside the TPZ. This tree species (Trees 7 and 8) is tolerant of tree root disturbance and the estimated incursion is less than 10% this complies with Australian Standard 4970-2009. As tree root growth is unpredictable a tree root survey should be undertaken to identify any roots. Any proposed works must be outside the SRZ. Trees 7 and 8 will require canopy pruning to accommodate the light structure.	Minor pruning required for trees 7 and 8. Low and acceptable impact. No impact to tree 9.
Trees 10 and 11, light post C6	The position of the light post is approximately 6 metres from tree 10 and 5 metres from tree 11. There is unlikely to be any affect to tree 10 as works are outside the TPZ. This tree however, is in very poor health and removal should be considered. The light post is within the TPZ of tree 11 and outside the SRZ, yet within the TPZ. The incursion is less than 10% and complies with Australian Standard 4970-2009. As tree root growth is unpredictable a tree root survey should be undertaken to identify any roots. Any proposed works must be outside the SRZ. Tree 11 may require minor pruning to accommodate the light structure.	Removal of tree 10 is recommended due to poor health. Reasonable and acceptable impact. Minor pruning required for Tree 11. Low and acceptable impact.
Trees 12, 13 and 14	The position of the light post is approximately 12 metres from tree 13 and 14 and 17 metres from tree 12. There is unlikely to any affect to tree 12 as works are outside the TPZ. The	No impact to tree 12.

Tree/ light post	Assessment	Impact
Light post	light post is within the periphery of TPZ of tree 13 and 14, it is unlikely these trees will be affected by the installation of the light post. A tree root survey is not required. The further the structure is from the tree the less the impact. Trees 13 and 14 will require minor pruning to accommodate the light tower. It is anticipated 2 x 120mm branches should be pruned from tree 13 and 3 80mm branches from tree 14.	Minor pruning required for trees 13 and 14. Low and acceptable impact.
Trees 15 and 16 Light post C23	The position of the light post is approximately 8 metres from tree 15 and 4.5 metres from tree 16. There is unlikely to any affect to tree 15 as works are outside the TPZ. The light post is within the TPZ of tree 16 yet at the periphery, it is unlikely these trees will be affected by the installation of the light post. A tree root survey is not required. The further the structure is from the tree the less the impact. No pruning is required.	No impact to tree 15. Low and acceptable impact to tree 16.
Trees 17 and 18 Light post C24	The proposed light post is within the TPZ of trees 17 and 18, it is also within the SRZ of tree 17. The expected impact to these trees will be minimal as only a minor portion of the TPZ is being affected. To confirm the effects a tree root survey should be undertaken to determine the exact impact.	Minimal and acceptable impact.
Trees 19, and 20 Light post D1	The proposed light post location is between trees 19 and 20. This is at the periphery of the TPZ for both trees. The impact to these trees is expected to be minimal as the percentage of the TPZ affected is low and these trees are young and can tolerate a greater level of tree root disturbance. A tree root survey is not required.	No impact

Mitigation Measures

The Arboricultural Assessment identifies the following mitigation measures to minimise impacts on existing significant trees:

- Retain trees 1-20, consider removal of tree 10 due to poor health.
- Appoint project arborist. Minimum AQF Level 5 with 5 years' experience.
- Survey light post locations and size of excavation required. Re-assess the potential impact to any surrounding trees.
- Minor relocation of light posts C4, C5 and C6 to minimise impacts to trees may be required.
- Requirements prior to issuing a construction certificate
  - Request work method statement regarding the requirements to construct the light poles and tunnel boring. Items that must be addressed are;
    - (a) locations of open pits and depth of tunnel boring, ensuring this method is used throughout the project. Reassessment will be required if this method cannot be adopted.
    - (b) Size of excavation hole required for each light post addressed in this report. At present a 2 metre diameter hole has been assumed.
    - (c) Positions of machinery to undertake excavation and machinery to erect light posts.

(d) Amount and exact pruning requirements when positioning the light posts.

– Develop tree protection plan. Plan must be prepared to AS4970-2009 include but not limited to; Parts a and b must be done prior to construction certificate to determine tree roots potentially impacted.

(a) Excavation of the top 600mm of soil using tree sensitive techniques that include hand excavation, air spade or high-pressure water and the use of a vacuum truck.

(b) Contingency plan if tree roots greater than 60mm are to be severed.

(c) Locations of machinery and the use of ground protection and tree protection fencing where required.

(d) Documented tree pruning requirements.

(e) AQF level 5 Arborist supervision during any excavation within the TPZ of existing trees.

(f) AQF level 5 pruning supervision.

- All trees must be retained and protected in accordance with Australian Standard 4970-2009. A tree protection plan has not been provided until further information regarding method of construction and tree root surveys are carried out. Section 10 Appendix G (of Arboricultural Assessment) contains generic specifications for these tree protection measures.

Summary:

As concluded by the Arboricultural Assessment, the proposed installation of light poles for night racing will have minimal to minor impact on existing trees on the site, and that all trees can be retained (apart from one tree recommended to be removed due to poor health). Recommended mitigation measures have identified management measures including a tree protection plan and monitoring to mitigate trees. In addition, a minor relocation of light poles C4, C5 and C6 are recommended to minimise impacts on trees. This recommendation can be incorporated into the detailed design phase prior to issue of a construction certificate, as originally recommended within the Visual and Landscape Assessment prepared by Sturt Noble Architects.

Subject to the above mitigation measures being implemented, Council's concerns are addressed and the proposal is considered acceptable for approval.

4.3.7.2. Grey Headed Flying Fox assessment

Cumberland Ecology was commissioned to undertake a Biodiversity Impact Statement (**BIS**) (**Appendix G**) in response to Council's request for assessment of potential impacts on the Centennial Park colony of grey headed flying foxes, in accordance with Commonwealth guidelines.

The Grey-headed Flying-fox (*Pteropus poliocephalus*) is listed as Vulnerable under both the *NSW Biodiversity Conservation Act 2016* (**BC Act**) and *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**). This environmental impact assessment has been undertaken in accordance with the Commonwealth National Light Pollution Guidelines for Wildlife, which were published in January 2020.

Cumberland Ecology confirmed the flying-fox colony in Centennial Park is based in a camp within Lachlan's Swamp, in the southern portion of Centennial Park as shown in **Figure 2**. The camp covers an area of approximately 6.5 ha and was established in 2010. The average population count since January 2012 is approximately 21,000 individuals, with the largest number of flying-foxes recorded to date being 95,442 in February 2020. The camp is an important annual maternity roost within central Sydney.

As shown in **Figure 2**, the Centennial Park flying-fox camp is located approximately 800 m north of the subject.

Figure 2 Location of the Centennial Park Grey-headed Flying-fox camp

Source: Cumberland Ecology

Cumberland Ecology undertook a desktop assessment and site inspection on 22 September 2021 to determine potential movement patters of the flying foxes on a specific date when they leave the Centennial Park camp at dusk.

When assessing the importance of the habitat to the species, it is recognised that the Centennial Park Grey-headed Flying-fox camp is a nationally important camp under the EPBC Act and considered as an important annual maternity roost within central Sydney. However, the project is not expected to result in any direct impacts on the actual camp. Furthermore, based on the National Flying-fox Monitoring Viewer, there are a number of other known camps within Sydney that meet the criteria for being nationally important in the Greater Sydney area (including Wolli Creek, Gordon and Parramatta Park). Therefore, although the Centennial Park camp is an important camp for the species, it is not the only camp site found in the Sydney area.

Although the project will not directly impact the camp, based on the known behaviour of the flying-fox and the proximity of the subject site to the Centennial Park camp, the main impact that may arise from the increased lighting associated with the project is considered to be changes to the species movement patterns at fly-out from the camp at dusk.

However, when determining the risk of an impact to the species movement patterns, it is important to consider the extent of the additional light impacts. The night race events will take place over 16 nights spread out over the season between October and April. Based on the light impact assessment by IGS, this will result in approximately 11.5 hours of lights at full intensity per racing season. With the implementation of design features such as baffles and shields, the light spill during these 11.5 hours will be minimised.

Figure 3 Photos from Flying-fox site visit

Source: Cumberland Ecology

Although the lighting will be increased for a relatively short period of time during each of the night racing events, it will occur within an environment that has a high existing ambient light level within a highly urbanised area and therefore will mainly contribute to existing sky glow as opposed to creation of a new visible light source. As a result, the Flying-foxes are likely to already be relatively accustomed to the light environment at night.

Based on the information above, it is considered unlikely that the artificial lighting associated with the project will significantly impact on the movement patterns of the Grey-headed Flying-fox.

Mitigation Measures:

A number of mitigation measures to deal with light spill will be implemented for the project, as outlined in detail within the Light Impact Assessment by IGS. Key mitigation measures that relate to minimising impacts on Flying-foxes include the limited number of night racing events, dimming of lighting between races and design of lights to minimise light spill.

In addition, to the monitoring and auditing proposed in the Lighting Impact Assessment by IGS, in which the actual lighting is continuously measured and audited, it is recommended as part of this environmental impact assessment that an ecological monitoring program is implemented to monitor any potential adverse impacts on the Grey-headed Flying-fox colony and to inform the Adaptive Management Strategy.

It is recommended that a Grey-headed Flying-fox Monitoring Plan (Monitoring Plan) is prepared and implemented by a qualified Ecologist as part of the Development Consent Conditions for the project. The Monitoring Plan should include a detailed design of the ecological monitoring program and associated reporting requirements.

The monitoring program should include baseline monitoring of the Flying-fox camp fly-out at dusk prior to the first night racing event, over a minimum of three-five days. The monitoring should then be repeated during the first night racing event. It is recommended that this monitoring sequence is repeated for the first five nights of racing events, with due consideration to seasonal changes in foraging behaviour and movement patterns of the Flying-foxes. If no significant changes in the Flying-fox colony's fly-out movement patterns or behaviours are recorded following the monitoring of the first five nights of racing events, then it is recommended that no further monitoring is required. However, if a significant difference in the Flying-foxes behaviour or movement patterns is recorded in associated with the usage of lights at the night racing events, the Adaptive Management Strategy will be triggered.

In the unlikely event that the monitoring results indicate a shift in the movement patterns or behaviour of the Grey-headed Flying-fox colony at fly-out from the camp, due to the lights used during the night racing events, it is recommended that the following measures are implemented as part of an Adaptive Management Strategy:

- Continuation of the Grey-headed Flying-fox monitoring program for the remainder of the night racing season, as per the Monitoring Plan.

- Preparation and implementation of an Artificial Light Management Plan, in accordance with the Guidelines.
- Further review of the lighting used for the night racing events, and the potential for additional mitigation measures to be implemented.

Additionally, the Monitoring Plan should be revised as required in response to the findings of the ongoing monitoring.

Summary:

When considering the suite of mitigation measures proposed for the project, including a recommended ecological monitoring program and adaptive management strategy, in combination with the limited number of events proposed, it is considered unlikely that the artificial lighting associated with the project will significantly impact on the movement patterns of the Grey-headed Flying-foxes at Centennial Park. As such, Council's concerns are noted, however, the proposed is considered acceptable for approval subject to mitigation measures being implemented.

4.3.8. Visual impact

Key Issue:

Council suggested the light poles be painted in a dark colour, rather than being galvanised steel.

> ***Council submission***
>
> *"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."*
>
> *"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."*

Response:

As confirmed by IGS, the proposed light poles will be made of galvanised steel (**Appendix F**). The poles will be unpainted and will naturally dull over time through exposure. This will facilitate the poles receding in visual significance compared to painted poles. This is consistent with the visual mitigation measures recommended by Sturt Noble in the exhibited Visual Impact Statement and confirmed as acceptable by Urbis in **Appendix I**, in regard to mitigating impacts on the heritage significance of the site.

Sturt Noble's recommendation for tree planting as a visual mitigation measure is acknowledged, however there is no additional tree planting proposed for this application. The Applicant considers this acceptable for the following reasons:

- There is a substantial amount of large tree planting around the perimeter of the racecourse, including along Alison Road, Wansey Road and High Street.
- Existing gaps in tree screening is primarily along the frontage to Alison Road between the intersection of Darley Road and Cowper Street, as shown in **Figure 3**. This gap is approximately 80 metres long when considering the construction of the future Hotel approved under SSD-5002. This gap is opposite primarily commercial land uses and so impacts on sensitive receivers is minimised. Some tree planting has already occurred to fill gaps along this frontage as shown in **Figure 4**, extracted from the Visual Impact Assessment prepared by Sturt Noble. These trees will grow over time to fill in existing gaps.
- Additional tree planting has potential to conflict with the Sydney Light Rail infrastructure along this frontage due to its proximity to the boundary of the racecourse and an existing service road inside the racecourse boundary prevents additional planting within the racecourse.

- It is noted that existing street tree planting on the northern side of Alison Road already provides additional tree screening for residential properties opposite the racecourse.
- A secondary gap in planting is identified behind the Wansey Road Light Rail stop, located on the corner of Alison Road and Wansey Road. However, tree planting has already occurred in this location and this gap will be filled once the trees have grown to maturity.

Figure 4 Analysis of tree screening and visual impacts on Alison Road

Source: Urbis

In addition to minimising visual impact of proposed light poles, Urbis has also considered the potential mitigation measures to minimise visual impact on the heritage conservation area from the proposed generators in **Appendix J**. Urbis confirms that the proposed generators will be screened behind an enclosure, which has a natural timber finish (refer to **Figure 5**) as an example.

Urbis has also recommended that vegetation screening also be applied commensurate with the landscaped character of the site, to soften the visual impacts of these elements. Given the nature of operations across the site and use of mechanical facilities across the site, the proposed generators are not considered incompatible with the use of the site and the proposed screening measures will assist in reducing their visual appearance. It is recommended that the final details of screening and planting be provided prior to issue of a construction certificate.

Figure 5 Example screening for generators

Source: Covrit

Summary:

Based on the above, the Applicant has already undertaken all possible mitigation measures for tree planting as part of previous development, that will minimise visual impact from the proposed lighting infrastructure as part of this proposal.

Mitigation measures are also proposed to minimise the visual impact of generators located on the infield of the racecourse. Notwithstanding, the generators are not inconsistent with the use of the site or its operational nature.

As such, Council's concerns are noted, however, the proposed is considered acceptable for approval.

4.3.9. Heritage

Key Issue:

Whilst Heritage NSW advised that the site was not State heritage listed and therefore no comments were required, Council requested further information related to European archaeology.

> ***Council submission***
>
> *"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."*

Response:

Urbis was commissioned to review existing advice on European Archaeology and provide a response to submissions received from Council and Heritage NSW – Aboriginal Cultural Heritage Regulation – South Heritage NSW, relating to Historical and Aboriginal Archaeology. Refer to **Appendix I** and summarised responses in **Table 9**.

Table 12 Response to submissions summary - Heritage

Issue	Response
Aboriginal Archaeology (Heritage NSW – Aboriginal Cultural Heritage Regulation – South Heritage NSW)	Urbis notes that the SEARS for this assessment did not include a requirement for an ACHA. McCardle made the decision not to undertake an ACHA on the basis of the high levels of disturbance at the subject site. Response to this comment is included in detail in the Addendum Aboriginal Due Diligence (**ADD**) Letter, provided in **Appendix I**. Urbis has previously undertaken an ACHA for a site at the Royal Randwick Racecourse, being the Leger Lawn. Details of this consultation are included in the ADD Letter provided. The existing ADD prepared by McCardle was prepared prior to the extensive excavations within the surrounding area, which have provided further clarification on the archaeological sensitivity of the former sand dunes within the Royal Randwick Racecourse area. These excavations have been considered in the addendum letter. Further discussion of ancillary works has been included in the addendum letter, including discussion of their potential impact to potential resources. **SUMMARY** Based on the addendum ADD and further assessment undertaken, it is confirmed that there the proposed development will have no impact on Aboriginal Archaeology, and subject to implementation of mitigation measures recommended by Heritage NSW, including Aboriginal cultural heritage awareness inductions and an unexpected finds protocol for Aboriginal objects, the proposed is acceptable for approval.
Aboriginal Archaeology (Randwick City Council)	Urbis has prepared an ADD for the subject site, which clarifies the location and discussion of AHIMS ID #45-5-3968. This site is not registered within or in proximity to the subject site and was referenced in error. **SUMMARY** No further assessment is required.
European Archaeology (Randwick City Council)	Urbis has prepared an addendum Historical Archaeological Impact Assessment (**HAIA**) letter. This letter considers the archaeological potential and significance of the subject site (in accordance with the Heritage Act 1977, as amended 2009). This has necessitated updates to the 2006 GML CMP grading of archaeological significance which does not meet the requirements of the legislative changes which came into effect in 2009. This assessment has considered the impacts of the proposal against the 2006 archaeological zoning plan prepared by GML for the CMP. The addendum HAIA letter has considered the impacts of the proposed works against areas of identified potential and significance as identified by GML in 2006 and updated by Urbis in 2021. This is provided in **Appendix I**. The addendum HAIA has concluded the structures will not impact on the archaeological resources associated with the Spectator Precinct and ARF Laboratory area, with the 12 light columns proposed in areas outside of identified significance. **SUMMARY** Based on the addendum HAIA and further assessment undertaken, it is confirmed that the proposed development will not impact on European Archaeology and is therefore acceptable for approval.

4.3.10. Event capacity and management

Key Issue:

Some submissions from public, Council and TFNSW sought further information on the scale, frequency and management of night racing events. Council also requested clarification as to whether super racing events (combined day and night time event) is being proposed.

> ***Council submission***
>
> *"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, with a reduction in the number of proposed night racing events."*
>
> *"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."*
>
> *"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."*
>
> ***TFNSW submission***
>
> *"The Event Management Plan should take into consideration other major events being held in the Moore Park precinct, Night race meetings should be co-ordinated with the major event entertainment precinct to minimise impacts on the local transport network and land uses"*

Response:

The following clarifications are provided in response to submissions received related to event capacity and management. The following is consistent with details proposed in the exhibited EIS:

- The Applicant is seeking approval for 16 night racing events per year, concentrated between October and April (generally coinciding with NSW Daylight Savings).
- Night racing events would be scheduled to start at 6pm and end at 10pm. Refer to **section 4.3.11** for further detail on hours of operation.
- The number of total racing events at RRR will remain at approximately 45 publicly available races per year, as scheduled by Racing NSW at the beginning of each year. This scheduling occurs in advance of scheduling for all other events in the Moore Park precinct. As such, the Applicant has no control over potential clashes with other events in the area. Notwithstanding, the Applicant regularly meets with DPE, Council, NSW Police, TFNSW and Moore Park Event Operations Group (**MEOG**) to discuss management of events in the Moore Park and Randwick Precincts to minimise impacts on the area.
- The Applicant notes that Racing NSW may occasionally schedule a racing event outside of this typical period by exception. It is recommended that a condition of consent is applied that requires consultation with key stakeholders, including DPE, Council, NSW Police, TFNSW and MEOG prior to night racing events being scheduled outside of the proposed October and April period. It is also recommended that local residents be notified when all night racing events are scheduled.
- The Applicant is **not** seeking approval for racing events that transition from day time to night time. Events on a given day will either be a day time event as currently operates, or a night time event as proposed.
- Proposed night racing events will be structured as follows:
  - Up to 12 Minor events (Up to 10,000 patrons).
  - Up to 4 Medium events (10,001 to 15,000 patrons).
  - **No larger night racing events are proposed.**

- The Applicant notes that as there is no proposed net increase in the number of racing events per year at RRR, night racing events will inevitably result in fewer larger scale day time racing events. This will have a net positive outcome for local residents as the scale of events and associated impacts will reduce.
- The proposed night racing events are to be managed in accordance with the revised Draft Event Operational Management Plan (**EOMP**), in **Appendix H**.

4.3.11. Hours of operation

Key Issue:

Council and NSW Police requested clarification on the hours of operation, including what time night racing events would end, what mitigation measures would be in place if the end of the event is extended due to racing delays in extenuating circumstances, and what management measures will be put in place to minimise the risk of all patrons leaving the site at one time.

Council submission

"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"

"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."

"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 nigh time hours. Conditions should be recommended in this regard."

TFNSW submission

"Investigate the need delay commencement of race meetings outside of afternoon peak period (e.g commence from 7pm) on weekdays to help manage transport demand and to minimise the impact on traffic and transport operations within the Randwick Precinct;"

Response:

The following clarifications are provided in response to submissions received related to hours of operation. This clarification is based on information provided in the revised Draft Event Operational Management (**Appendix H**), including measures to control how patrons enter and exit the venue. These are consistent with details proposed in the exhibited EIS:

- Night racing events are proposed to be scheduled between 6pm to 10pm on a variation of Thursday, Friday, Saturday or Public Holidays. The final race will typically be scheduled to commence no later than 9.45pm to provide adequate time for completion of the race before 10pm.
- The Applicant is unable to delay the commencement of the event to 7pm as a four hour schedule is the shortest period possible to meet racing obligations with Racing NSW. As such, delaying the commencement to 7pm would either require the extension of the event to 11pm, or undermine the feasibility of the proposed night racing. As such, commencing the events at 6pm is considered the optimal proposal.
- All on-site activities including commentary and music should conclude at or before 10pm.
- 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.

- Patrons will be permitted to enter the site from 5pm. Entrance to the site before races commence at 6pm will be encouraged as a mitigation measure to minimise traffic impacts from patrons arriving during peak commuting periods. This mitigation measure was agreed with TFNSW and Council during post submission consultation. The sale of liquor on site will also commence at 5pm.
- The Applicant recognises that a considered approach is required to encourage patrons to exit the venue at the end of events in an orderly, safe and minimal disruptive manner. As such, a staggered approach is proposed as detailed in the draft EOMP, summarised as follows:
  - The Applicant acknowledges through monitoring of other day time and night time events across its portfolio of racing venues, that a proportion of patrons will typically begin to leave the venue before the final race. This will induce a staggered approach to patrons exiting the site.
  - The sale of liquor on site is to be closed in a staged manner in an effort to manage the number of patrons vacating the premises at one time:
    - Stage 1 – 2 drink limit in public bars 2 hours prior to scheduled last race.
    - Stage 2 – Public bar closure commencing from 1 hour prior to last race.
    - Stage 3 – Members close at start of last scheduled Sydney race.

Summary:

Based on the above, the Applicant has taken all reasonable measures to propose hours of operation for night racing events are controlled to minimise impacts on surrounding land uses, balancing the needs of minimising impacts on traffic and the amenity of residents. The Draft EOMP also proposes measures to encourage the staggered approach to patrons exiting the site and minimise disturbance of the local area past 10pm. As such, all concerns are noted, however, the proposed is considered acceptable for approval.

4.4. PROJECT EVALUATION

Key Issue:

Some submissions claimed the project should not be a state significant development and is not in the public interest. Another submission claims that the proposed use of the site is inconsistent with the precinct objectives, being within a dense residential area and the Kensington and Kingsford corridor.

Response:

Concerns raised in submissions are noted. Royal Randwick Racecourse has operated as a racing venue on site for over 150 years and is leased to the Australian Turf Club for the purpose of horse racing as its primary purpose.

The use of the site is consistent with the objectives of *A Metropolis of Three Cities*, the *Eastern City District Plan 2018*, and is identified as being part of the Randwick Collaboration Area in the *Randwick Local Strategic Planning Statement* (**LSPS**). The racecourse is identified in the LSPS as an iconic cultural and recreational landmark and contributes to Randwick's (and the State's) economy.

Royal Randwick Racecourse is also identified as being a site State Significant Development under the *State Environmental Planning Policy (State and Regional Development) 2011* and the proposed use is permitted with consent as a major recreational facility, and consistent with the land use objectives of the RE1 zoning.

Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* 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. 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.

Based on the above, the site is of state significance and its current use, and proposed use are consistent with Government plans, policies and guidelines. As such, all concerns are noted, however, the proposed is considered acceptable for approval.

4.5. ISSUES BEYOND PROJECT SCOPE OR NOT RELEVANT

Key Issue:

Nine public submissions were made related to concerns of animal welfare.

Five submissions referred to other matters outside of scope of the proposal, including religious beliefs, a development application for skydiving at RRR (approved), the racing industry, over development in NSW.

Response:

Concerns raised in submissions are noted. However, these matters are outside the scope of the proposal. As such, all concerns are noted, however, the proposed is considered acceptable for approval.

5. UPDATED PROJECT JUSTIFICATION

This section provides an updated justification and evaluation of the project as a whole.

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 DPE. 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 revised Draft Events Operational Management Plan.

In response to submissions received during public exhibition, the following has been undertaken and provided:

- Additional consultation with DPE, TFNSW and Council has been undertaken to discuss mitigation measures and recommended methodologies to minimise impacts on the locality.
- Clarification on noise assessment and confirmation of proposed mitigation measures to minimise noise impacts during events (including commentary and music), and noise disturbance from vehicles and patrons exiting the venue, and potential noise from proposed diesel generators.
- Clarification on traffic impact assessment, in consultation with DPE, TFNSW and Council to minimise impacts on traffic congestion, encourage use of public transport, and hours of operation. A Traffic and Transport Management Plan (TTMP) has been provided to clarify management measures.
- Clarification on lighting design, including confirmation that the proposed lighting is fully compliant with all Australian Standards and will cause no unacceptable light spill. Clarification is provided to confirm that proposed light poles will be galvanised steel to minimise visual impact and that the proposed use of diesel generators is an appropriate source of generating power due to the minimal usage proposed.
- Additional information has been provided through an Ecological Assessment to confirm that the Grey-headed Flying-fox camp at Centennial Park will not be adversely impacted by the proposal.
- Additional information has been provided through an Arboricultural Assessment to confirm that there will be no adverse impacts to existing trees located on the site. One tree is proposed to be removed due to poor health.
- Clarification on assessment of Aboriginal archaeology, European archaeology and Built heritage for the site.
- A revised Draft Events Operational Management Plan is provided, to further clarify mitigation measures related to noise, traffic and accessibility, residential amenity, safety and security, emergency provisions and service of alcohol.
- A new Site Plan is provided as requested by DPE.

Key clarifications

- The Applicant is seeking approval for 16 night racing events per year, concentrated between October and April (generally coinciding with NSW Daylight Savings).
- Night racing events would be scheduled to start at 6pm and end at 10pm.
- The number of total racing events at RRR will remain at approximately 45 publicly available races per year.
- The Applicant is **not** seeking approval for racing events that transition from day time to night time.
- Proposed night racing events will be structured as follows:
  - Up to 12 Minor events (Up to 10,000 patrons).
  - Up to 4 Medium events (10,001 to 15,000 patrons).
  - **No larger night racing events are proposed.**
- The proposal includes the installation of new trackside lighting (new light poles) and the upgrade to the existing Spectator Precinct lighting (new lamps will be mounted on existing poles to improve safety).
- The proposed night racing will **not** result in a net increase in the number of racing events per year at RRR. Night racing events will inevitably result in fewer larger scale day time racing events.
- The proposed night racing events are to be managed in accordance with the revised Draft Event Operational Management Plan (EOMP).
- A critical mitigation measure proposed to minimise traffic and noise impacts on Doncaster Avenue is for the Gate 18 (Ascot Street) exit to be closed to all pedestrians and most vehicles after 8pm for night racing events. Pedestrians, taxis and Ubers will be required to enter and exit via Gate 1 Gate 1 at Alison after 8pm.
- The proposed lighting design implements cutting edge technology to mitigate light spill. The highest level of light spill outside the racecourse is 21.48 lux, which is well below the maximum permitted of 110 lux for properties within 50 to 100 metres from the site.

- 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.
  - 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 relevant matters, there will be no additional environmental impacts as a result of the proposed refinements and clarifications. The refinements include additional measures to ensure any previously known and assessed impacts will be appropriately managed and mitigated where relevant. On this basis, the proposed development is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

6. DISCLAIMER

This report is dated 30 November 2021 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd **(Urbis)** opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of AUSTRALIAN TURF CLUB **(Instructing Party)** for the purpose of SSDA - Response to Submissions **(Purpose)** and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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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.

APPENDIX A SUBMISSIONS REGISTER

APPENDIX B UPDATED MITIGATION MEASURES

APPENDIX C SITE PLAN

APPENDIX D NOISE ASSESSMENT – RESPONSE TO SUBMISSIONS

APPENDIX E TRAFFIC ASSESSMENT – RESPONSE TO SUBMISSIONS AND TRAFFIC MANAGEMENT PLAN

APPENDIX F LIGHTING ASSESSMENT – RESPONSE TO SUBMISSIONS

APPENDIX G BIODIVERSITY IMPACT STATEMENT – GREY-HEADED FLYING-FOX

APPENDIX H REVISED DRAFT EVENT OPERATIONAL MANAGEMENT PLAN

APPENDIX I ARCHAEOLOGY ASSESSMENT – RESPONSE TO SUBMISSIONS

APPENDIX J BUILT HERITAGE ASSESSMENT – RESPONSE TO SUBMISSIONS

APPENDIX K ARBORICULTURAL ASSESSMENT

APPENDIX L TYPICAL TRACKSIDE LIGHT POLE ELEVATION PLAN

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