

APPENDIX A – SUBMISSIONS REGISTER

The following table includes all 57 submissions received in total during the public exhibition of SSD-8706 for Night Racing at Royal Randwick Racecourse, exhibited between Wednesday 26 May 2021 to Tuesday 22 June 2021.

Group	Name/ topic/ submitter	Submission	Relevant Section of RTS report
Public Authorities (State or Commonwealth Agencies and Council)	Transport for NSW	The Greater Sydney Division of Transport for NSW (TfNSW) will provide a response for the above. Therefore, no submission will be provided for the DPIE's request via development@transport.nsw.gov.au in this instance.	Refer to Section 3.1, 4.2 and Appendix A
	Transport for NSW – Greater Sydney Division	<p>The documents prepared to support the development application acknowledge that the proposed night time race meetings would require a detailed Transport and Pedestrian Management Plan. The Plan would be required to manage general traffic and public transport operation and safety of pedestrians and cyclists accessing the subject site as well as in the vicinity of the Racecourse. Details are provided below:</p> <ul style="list-style-type: none"> The arrival of patrons for a weekday night race would coincide with the PM peak period. As indicated in the Transport Impact Assessment, traffic conditions in the area surrounding the site are operating at or near capacity. Therefore a weekday night race meeting would likely have a significant impact on general traffic and race goers accessing the site; The proposed night time race meetings would increase demand for bus and light rail services, which would already be servicing for commuters during the PM peak commuters, in addition to the arrival of patrons for a weekday night race; Due to the high levels of pedestrian movements, the pedestrian crossings across Alison Road at Darley Road need to be actively managed by the event operator during bump in/out periods; and Due to high volumes of patrons accessing the site by point to point transport services, adequate dedicated passenger pickup/drop-off facilities for point to point transport services need to be provided. <p>Recommendation</p> <p>It is requested that:</p> <ul style="list-style-type: none"> The applicant undertakes the following as part of the Response to Submissions; 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; Provides details of traffic management measures to ensure no impact on the light rail depot exit and entry of light rail vehicles; and Consult with TfNSW, the Sydney Light Operator and Sydney Trains to confirm that existing and future transport services would be able to accommodate the demand generated by the night time racing. The applicant be conditioned to prepare a detailed Transport and Pedestrian Management Plan in consultation with TfNSW and the Sydney Light Rail Operator and submit the final Plan for TfNSW endorsement, prior to the issue of the Construction Certificate. 	Refer to Section 3.1, 4.2 and 4.3.2
	Transport for NSW – Greater Sydney Division – Traffic and Parking	<p><u>Comment</u></p> <p>The documents prepared to support the development application acknowledge that the proposed night time race meetings would require a detailed Transport and Pedestrian Management Plan. The Plan would be required to manage general traffic and public transport operation and safety of pedestrians and cyclists accessing the subject site as well as in the vicinity of the Racecourse. Details are provided below:</p> <p>The arrival of patrons for a weekday night race would coincide with the PM peak period. As indicated in the Transport Impact Assessment, traffic conditions in the area surrounding the site are operating at or near capacity. Therefore a weekday night race meeting would likely have a significant impact on general traffic and race goers accessing the site;</p>	

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		<p>The proposed night time race meetings would increase demand for bus and light rail services, which would already be servicing for commuters during the PM peak commuters, in addition to the arrival of patrons for a weekday night race;</p> <p>Due to the high levels of pedestrian movements, the pedestrian crossings across Alison Road at Darley Road need to be actively managed by the event operator during bump in/out periods; and</p> <p>Due to high volumes of patrons accessing the site by point to point transport services, adequate dedicated passenger pickup/drop-off facilities for point to point transport services need to be provided.</p> <p><u>Recommendation</u></p> <p>It is requested that:</p> <ul style="list-style-type: none"> ▪ The applicant undertakes the following as part of the Response to Submissions; ▪ 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; ▪ Provides details of traffic management measures to ensure no impact on the light rail depot exit and entry of light rail vehicles; and ▪ Consult with TfNSW, the Sydney Light Operator and Sydney Trains to confirm that existing and future transport services would be able to accommodate the demand generated by the night time racing. ▪ The applicant be conditioned to prepare a detailed Transport and Pedestrian Management Plan in consultation with TfNSW and the Sydney Light Rail Operator and submit the final Plan for TfNSW endorsement, prior to the issue of the Construction Certificate. <p><u>Comment</u></p> <p>The suitability of the pedestrian network to accommodate the forecast pedestrian demands, particularly at night needs to be assessed. Section 7.8 of the Transport Impact Assessment states the following:</p> <ul style="list-style-type: none"> ▪ Measures to improve pedestrian accessibility and reduce impacts include: ▪ Maintain a comprehensive site wayfinding approach, including maps, signage, and staff guidance" ▪ Wayfinding and Signage Strategy needs to be prepared to improve wayfinding and signage to the surrounding local areas and between public transport nodes and the development site, including lighting. <p><u>Recommendation</u></p> <p>It is requested that the applicant conditioned to prepare a Wayfinding and Signage Strategy in consultation with TfNSW and the Sydney Light Rail Operator to improve wayfinding and signage to the surrounding local areas and between public transport nodes and the development site and submit a copy of the final Strategy to TfNSW, prior to the issue of the Construction Certificate.</p> <p><u>Comment</u></p> <p>The adequacy of the proposed measures such as wayfinding and signage, lighting, etc. need to be assessed for key routes to the surrounding local areas and between public transport nodes and the development site for night time conditions. Access to the Royal Randwick Light Rail stop is on the northern side of Alison Road for patrons departing night racing should also be addressed.</p> <p><u>Recommendation</u></p> <p>It is requested that the applicant be conditioned to:</p> <ul style="list-style-type: none"> ▪ Prepare a Transport and Pedestrian Safety Plan in consultation with TfNSW and the Sydney Light Rail Operator and submit a copy of this Plan for TfNSW endorsement, prior to the issue of the Construction Certificate; and ▪ Undertake a Road Safety Audits for traffic, transport and pedestrian facilities / arrangements for the night time race meetings within and in the vicinity of the Randwick Racecourse, in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits. Based on the results of the road safety audit, the applicant shall implement safety measures as required. The audit shall be undertaken 	

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		<p>prior to the commencement of night time race meetings and three (3) months after the commencement of night time race meetings</p> <p><u>Comment</u></p> <p>It is advised that any construction activities associated with the night time racing should not have impact on general traffic and public transport operation as well as pedestrians and cyclists safety in the vicinity of the Randwick Racecourse.</p> <p><u>Recommendation</u></p> <p>It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW and the Sydney Light Rail Operator and submit a copy of the final plan for TfNSW endorsement.</p> <p><u>Travel Demand Management</u></p> <p>Prior to the issue of the Occupation Certificate, the applicant shall prepare a Travel Demand Management Strategy and Green Travel Plan in consultation TfNSW and other relevant stakeholders. The applicant shall submit a copy of the final plan via development.sco@transport.nsw.gov.au for TfNSW, prior to the issue of an occupation certificate.</p> <p>The GTP must be implemented and updated annually to ensure sustainable transport outcomes and achieve the overall strategic planning objectives in Future Transport 2056.</p> <p>The plan shall be reviewed and updated annually in consultation with the aforementioned stakeholders and provide an Implementation Strategy that commits to specific management actions, including operational procedures to be implemented along with timeframes.</p> <p>The plan (as reviewed and updated annually) shall be implemented by the applicant for the life of the development.</p> <p><u>Transport and Pedestrian Safety</u></p> <p>Prior to the issue of the Construction Certificate, the applicant shall prepare a Transport and Pedestrian Safety Plan in consultation with TfNSW and the Sydney Light Rail Operator and submit a copy of this Plan for TfNSW endorsement. The Safety Plan should include a detailed pedestrian route assessment of key routes to the surrounding local areas and between public transport nodes and the development site, including night time conditions.</p> <p>The applicant shall undertake a Road Safety Audits for traffic, transport and pedestrian facilities / arrangements for the night time race meetings within and in the vicinity of the Randwick Racecourse, in accordance with Austroads Guide to Road Safety Part 6: Managing Road Safety Audits and Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits by an independent TfNSW accredited road safety auditor. Based on the results of the road safety audit, the applicant shall implement safety measures as required. The audits shall be undertaken prior to the commencement of night time race meetings and three (3) months after the commencement of night time race meetings.</p> <p><u>Construction, Pedestrian and Traffic Management</u></p> <p>Prior to the issue of any construction certificate or any preparatory, demolition or excavation works, whichever is the earlier, the applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW and the Sydney Light Rail Operator. The applicant shall submit a copy of the final plan to development.sco@transport.nsw.gov.au for TfNSW endorsement.</p>	
	Event Capacity and Management	<p><u>Comment</u></p> <p>It is noted that an Event Operational Management Plan has been prepared for night racing as part of the development application. The largest events in the Moore Park precinct are held at night, at both the Sydney Cricket Ground and at the Sydney Football Stadium (which will be reopened in 2022). Additionally there is an established night entertainment precinct at the Entertainment Quarter and Centennial Parklands also operates as a night venue for concerts at times.</p> <p>It is advised that:</p> <ul style="list-style-type: none"> ▪ 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; ▪ In order to minimise the impact on the road network, event finish times must be scheduled to occur after the PM peak period; and 	Refer to Section 3.1, 4.2 and 4.3.10

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		<ul style="list-style-type: none"> While police control is necessary, the number of vehicles that have been shown in the traffic modelling undertaken will not be able to be managed by police alone and thorough investigation should be conducted into self-regulating management devices that do not require excessive personnel management. <p><u>Recommendation</u></p> <p>It is requested that the applicant be conditioned to update the Event Operational Management Plan in consultation with TfNSW, the Sydney Light Rail Operator and the relevant stakeholders and submit the final Plan for TfNSW endorsement, prior to the issue of the Construction Certificate.</p> <p>Event Management</p> <p>Prior to the issue of the Construction Certificate, the applicant shall update the Event Operational Management Plan in consultation with Transport for NSW and the Sydney Light Rail Operator and submit the final Plan for TfNSW endorsement.</p>	
	Sustainability	<p><u>Comment</u></p> <p>Section 7.6.6 of the Transport Impact Assessment prepared to support the development application states the following</p> <p>Measures to reduce private vehicle trip generations include:</p> <ul style="list-style-type: none"> Establish event-specific sustainable travel plans in the lead up to events; Regularly update the website and wayfinding to incorporate changes in local travel infrastructure and timetables, and seek opportunities to promote them' It is advised that TfNSW supports the applicant's proposal to encourage the use of non-car transport options and requests that the applicant prepares a Travel Demand Management Strategy and Green Travel Plan for the proposed development in consultation with TfNSW and the relevant stakeholders. <p><u>Recommendation</u></p> <p>It is requested that the applicant be conditioned to prepare Travel Demand Management Strategy and Green Travel Plan, in consultation with TfNSW and the relevant stakeholders, with the intent of increasing the use of public and active transport modes for the development and submit a copy of the final plan for TfNSW endorsement, prior to the issue of the Occupation Certificate.</p>	Refer to Section 3.1, 4.2 and 4.3.6
	Wayfinding and signage Strategy	The applicant shall prepare a Wayfinding and Signage Strategy in consultation with TfNSW and the Sydney Light Rail Operator improve wayfinding and signage to the surrounding local areas and between public transport nodes and the development site and submit a copy of the final Strategy to TfNSW, prior to the issue of the Construction Certificate.	Refer to Section 3.1 and 4.2
	Draft Conditions of Consent	Draft Conditions of Consent are included in TAB B. It is advised that the final suggested Conditions of Consent be provided as part of the comments on the applicant's response to submissions.	Refer to Section 3.1 and 4.2
	Centennial and Moore Park, Parramatta Park and Western Sydney Parklands Trust	<p>Just for the record this is to confirm that the Parklands did consider the proposal and concluded that there were no major issues or potential adverse impacts on the Parklands that warranted a formal submission.</p> <p>Please though continue to inform us if there are any changes to the proposal</p>	
	EPA	<p>I refer to the exhibition notice seeking comment on the State Significant Development application (SSDA) lodged by the Australian Turf Club for night racing at the Royal Randwick Racecourse.</p> <p>The proposal involves the use of the Royal Randwick Racecourse for 16 night racing events per year, held on Thursdays, Fridays, Saturdays and Public Holidays between 6pm and 10pm. Works associated with night racing events include:</p> <ul style="list-style-type: none"> 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. 	
	Heritage Council of Australia – Heritage	The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further, the site does not contain any known historical archaeological relics.	Refer to Section 4.3.9

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		Therefore, no further heritage comments are required. The Department does not need to refer subsequent stages of this proposal to the Heritage Council of NSW.	
	DPIE – Biodiversity and conservation Division – Ecology	<p>EES has no biodiversity comments on the proposal.</p> <p>The spectator precinct of the racecourse appears to become a high flood island during extreme flood events, with flooding in both access corridors of Alison Road and Members Drive highly hazardous. Similarly, surrounding roads of Ascot Street, Doncaster Avenue and Anzac Parade also experience high hazard flooding. Therefore, consideration should be given to flood emergency management. The proposed change to allow night racing introduces additional factors for consideration in emergency management.</p>	Refer to Section 4.3.7
Council	Event management	<ol style="list-style-type: none"> 1. The proposal has the potential to result in unacceptable amenity impacts to adjoining properties, including (but not limited to) traffic and parking impacts on the local road and network, light spill to adjoining properties and noise patron management. The submitted Environmental Impact Statement (EIS) and accompanying documentation is vague on event numbers and scheduling and does not adequately assess potential impacts. Where potential impacts are identified, Council is concerned that inadequate measures have been recommended to address these impacts. As such, Council recommends that the number of proposed night racing events per year be reduced. 2. In addition to a reduction in number of events, Council also recommends a time limited consent for night racing for a period of 3 years. A time limited consent will allow the Department and Council to assess the ongoing management performance of a venue and its impacts on neighbourhood amenity. The time limited consent will also allow for the flexibility to review conditions of consent and amend accordingly. 3. 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. 4. 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. 5. 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. 6. Clarification is also sought regarding the scheduling of events. While it is understood that specific event dates are determined by Racing NSW, further information is required on the process of event scheduling, particularly in relation to the potential cumulative impact of multiple events being held at nearby venues including the Sydney Football Stadium and Sydney Cricket Ground. 	Refer to Section 3.1, 4.2 and Appendix A
	Hours of Operation	<ol style="list-style-type: none"> 7. 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. 8. 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. 9. It is understood that bump-in/bump-out activities are proposed after the scheduled race hours of 6pm to 10pm. While some bump-in/bump-out activities such as cleaning are unlikely to result in unacceptable impacts to surrounding properties, other activities such as waste collection and dismantling of structures may result in unacceptable impacts and should not be carried out during night time hours. Conditions should be recommended in this regard. 	Refer to Section 4.3.11
	Noise, Safety and Public Disturbance	<ol style="list-style-type: none"> 10. 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 	Refer to Section 4.3.1 and 4.3.3

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		<p>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.</p> <p>11. The implementation of robust noise controls and monitoring during night racing events and the effective security management of patrons, including sufficient transport options are key in minimising the impacts from noise during the event and when patrons are leaving the Racecourse.</p> <p>12. The various management plans for the proposal, if implemented effectively and diligently, contain relevant measures to mitigate, but not eliminate the potential impacts of most concern. As such, Council recommends a reduction in number of events and a time limited consent, should the proposal be supported by the Department (see points 1 and 2 above).</p> <p>13. Council recommends that an on-going stakeholder forum is established that is capable of reviewing and, if required, implementing any necessary changes to, or the provision of additional measures to mitigate issues that may arise as the night program is delivered. At a minimum this forum should include the relevant event management representatives from the ATC, their security provider and their acoustical and transport consultants, relevant Council staff, NSW Police, Transport for NSW and representatives and representatives from the community.</p> <p>14. In addition to an on-going stakeholder forum, Council recommends the imposition of appropriate conditions to prompt for better communication with the surrounding neighbours at least 1 week prior to the event (i.e. letter drop with relevant event details including complaint hotline).</p> <p>15. It is noted that at this stage, night racing events on Sundays are not proposed. Council supports this, as there is concern the level of amenity that is generally expected on Sunday evenings by surrounding residents would not be maintained. For this reason, Council does not support night racing events on Monday evenings in the event that Public Holidays fall on a Monday.</p>	
	Transport and Parking	<p>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. The submitted EIS and supporting documentation does not adequately address this issue. An assessment of parking impacts on the local road network should be undertaken to assess the impact of patrons parking in local streets.</p> <p>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.</p> <p>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</p> <p>19. There are strong concerns about the traffic impacts of the proposals. These concerns are supported by the SIDRA modelling contained within the submitted Traffic Impact Assessment. All of the key indicators arising from the modelling of Class 2 (up to 15,000 patrons) and Class 3 (up to 10,000 patrons) events under both operating scenarios result in significant increases in each of the critical SIDRA indicators, including major increases in Delays, Degree of Saturation and 95th Percentile Back of Queue Distances.</p> <p>20. Such major increases in these SIDRA indicators, in a neighbourhood where many of the existing intersections are currently performing with a Level of Service of F, is unacceptable. The overlay of the additional event traffic onto a neighbourhood with traffic flows currently performing poorly, will create major delays, congestion and subsequent frustration for the event and non-event community.</p> <p>21. The acceptance within the Traffic Impact Assessment (page 37) that modelling shows extension to delays in the network around the majority of intersections surrounding the RRR is particularly concerning, especially within a local network already under traffic stress.</p>	Refer to Section 4.3.2

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		<p>22. Additionally, it is noted that the Traffic Impact Assessment advises that high traffic activity is expected 'where arrivals will coincide with the evening commuter peak. These associated impacts particularly relate to Class 3 events which is anticipated to be sustained for 1-2 hours, up to 12 events per year.' Such high traffic impacts for 1-2 hours is unacceptable for the local road system. Council therefore recommends that the number of scheduled events on Thursday and Friday evenings are minimised and Thursdays should be discouraged.</p> <p>23. The preparation of Pedestrian, Transport and Traffic Management Plans, Traffic Control Plans, a taxi management study and consultation with MEOG are all supported. As is notifying residents and promoting public transport. It is noted that shifting taxis/Ubbers to Gate 1 appears to create traffic problems along Alison Road, which should be addressed. Measures such as staggering arrivals, promoting car-pooling, seeking to increase mode share of cyclists, supporting increased shuttle services between hotels are also supported. However, undertaking continued patron surveys and regularly updating the website seem to be of limited value regarding car travel mitigation.</p> <p>24. To address the 1-2 hours of traffic impacts the Traffic Impact Assessment recommends that "the available public transport options be promoted and encouraged as a means of reducing the number of patrons opting to drive to these events." The encouragement of public transport options is very much supported by Council, however, that approach will not address the traffic congestion problem.</p> <p>25. A further concern, along Doncaster Avenue, is the interaction between bike riders on the soon to be constructed two-way cycleway and motorists, particularly at the Doncaster I Ascot Street intersection. The Traffic Impact Assessment rejects the need for traffic signals at the Doncaster I Ascot Street intersection, however Council recommends that signals should be installed. Signals will clarify for all road users, the priority at this intersection, which would be very important from a road safety perspective - especially during night time events.</p> <p>26. In summary, Council has significant concerns about the indicated traffic and parking effects. It is recommended that the number of proposed night racing events be reduced, with events on Thursday and Friday evenings discouraged. It is also recommended that all tickets to night time events must be pre-ordered and must include integrated ticketing. In other words, every ticket purchased must include free public transport to and from the venue. Additionally, a clearer explanation of how the traffic will be managed on surrounding streets, so as to not have the indicated 1-2 hours of high traffic impact, must be prepared and submitted to Transport for NSW and Council for assessment.</p>	
	Mechanical Noise	<p>27. A number of the proposed four diesel generators are located within close proximity to residential properties. An acoustic assessment of the generators should be undertaken to assess potential noise impacts on nearby residents.</p>	Refer to Section 4.3.1
	Protection of significant trees	<p>28. Concerns are raised over the potential impact of the proposed lighting column locations on existing significant trees. The Visual and Landscape Impact Report prepared by Sturt Nobel and Associates identifies three lighting columns in close proximity to exceptionally significant trees and three columns located in close proximity to existing trees of high significance. Potential impacts have been identified including damage to tree roots and incursion into Tree Protection Zones (TPZ). The Report recommends that physical assessment should be re-reviewed in consultation with an arborist at detailed design stage. Further, the EIS states that the exact final location of columns may vary up to 10% due to arborists advice during detailed design.</p> <p>29. 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.</p>	Refer to Section 4.3.7
	Visual Impact on heritage items and conservation areas	<p>30. The number, distribution and bulk of the proposed lighting columns will have a high degree of visibility from surrounding streets, from heritage items internal and external to the site and from the adjacent Randwick Racecourse heritage conservation area.</p> <p>31. 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.</p>	Refer to Section 4.3.8 and 4.3.9

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		<p>32. 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.</p> <p>33. No detail of the size or appearance of the generators has been provided, and it is unclear whether the generators will be housed within some sort of enclosure. The submitted Heritage Impact Statement recommends appropriate screening of the generators is provided in the form of a timber or perforated metal enclosure or fence. However, depending on the appearance of the generators, and whether they will be enclosed, further screening could add to the bulk of the installation. Council recommends details of the generators and proposed screening are provided for assessment.</p> <p>34. Notwithstanding the size and appearance of the generators, Council recommends that the generators not be used and alternative power sources be provided for trackside lighting.</p>	
	Sustainability	<p>35. 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.</p>	Refer to Section 4.3.6
	Heritage	<p>36. The Aboriginal Heritage Due Diligence letter prepared by McCardle Cultural Heritage includes a number of recommendations for the protection and management of protected sites and places of significance. The recommendations make reference to site 45-5-3968, however the site number is not discussed elsewhere in the Due Diligence letter or EIS. Clarification is required in this regard.</p> <p>37. The assessment of Aboriginal archaeology is sufficient to meet statutory requirements, and the recommendations of the Due Diligence letter should be included as consent conditions, subject to clarification of the site number which has been quoted.</p> <p>38. 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.</p> <p>39. The Potential Historical Archaeological Significance mapping identifies a number of sites within the Spectator Precinct and the ARF Laboratory Area, associated with previous structures, as being of Moderate significance and it is unclear whether excavation for the footings of the proposed light columns will impact on these archaeological values</p>	Refer to Section 4.3.9
	Lighting Design	<p>40. Consideration should be given to the potential impact on the nearby properties from the proposed upgrade of Spectator Precinct lighting. The layout of the proposed lighting is missing in submitted Lighting Assessment and the extract in the EIS is illegible.</p> <p>41. Council recommends a condition of consent requiring post installation adjustment of trackside and Spectator precinct lighting, to address any unacceptable light spill be found to adjoining properties.</p> <p>42. It is understood that trackside lighting levels have been designed to enable televised racing. However on occasions where racing is not televised, a lower level of lighting should be required to reduce unnecessary light spill impacts. Conditions should be recommended in this regard.</p> <p>43. The submitted EIS states that events will be concentrated between October and April to coincide with day light savings, reducing the hours required for lighting and therefore reducing the overall light spill impacts to adjoining properties. However, the EIS also states that flexibility is required to hold events outside of these months. Council recommends events be limited to between October and April to reduce the impacts of light spill to adjoining properties.</p>	Refer to Section 4.3.4
	Lighting Design, Ecology	<p>44. 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</p>	Refer to Section 4.3.4 and 4.3.7

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		<p>Conservation Act 2016 and the Commonwealth Environment Protection and Biodiversity Conservation Act 1999.</p> <p>45. The new Commonwealth National Light Pollution Guidelines for Wildlife (January 2020) state that the indirect effects of artificial light can be detrimental to threatened species. The guidelines recommend that where there is important habitat for listed species that are known to be affected by artificial light within 20 km of a project, species specific impacts should be considered through an Environmental Impact Assessment (EIA) process. The Lighting Impact Assessment provided at Appendix A of the EIS states that there would be minimal impact on local flora or fauna. However, it does not appear that an assessment of the potential impacts on the grey headed flying fox colony has been undertaken.</p> <p>46. 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.</p>	
Stakeholder Groups	Strata Committee SP 21408 – Traffic and Parking, Safety and Public Disturbance, Noise	<p>Our strata property 15 Doncaster Ave is approximately:</p> <p>300 m from Ascot Street entrance - taxi drop off and pick up area, multi-storey carparking entry.</p> <p>500 m from Bowral Street entrance</p> <p>350 m from Alison Road, Gate 1 entrance</p> <p>130 m from Alison Road busway</p> <p>240 m from ES Marks Light Rail Station</p> <p>400 m from Randwick Royal Light Rail Station</p> <p>There is an increase in noise associated from pedestrians, foot and car traffic during Randwick Racecourse racing weekly meets on Saturdays during the day. Randwick Racecourse hospitality employees can be seen arriving early morning, occupying all day parking spots on Doncaster Ave and surrounding streets. Racecourse patrons using ride share transport alight on Doncaster Ave. Patrons gather on the street at the front of our building as car share pick up/ waiting area.</p> <p>The proposed night racing event hours 6pm till 10 pm will have a negative impact on local residents. Patrons leaving the Randwick Racecourse at 10 pm will see an increase in noise, foot and car traffic along Doncaster Ave, Ascot and Bowral Streets. It will mean up to 15,000 patrons (medium race event) waiting for private and public transport will loiter in and around Kensington residential streets effectively until 11 pm or later on Thursdays, Fridays and Saturdays and public holidays between October – April.</p> <p>It is unreasonable for local residents to put up with the level of noise, foot and car traffic night racing will invite into our neighbourhood. In particular on Saturdays when racing will effectively run day and night, allowing no respite for local residents.</p> <p>Furthermore during October - April, events such music festival, concerts, football matches etc held in Centennial Park and Moore Park stadium will coincide with night race schedule. The collective impact of the issues (already mentioned) from these events occurring simultaneously in the evening is unfair on the residents.</p>	Refer to Section 4
	Keep Sydney Beautiful – Lighting Design and Noise	<p>This project in not in the public interest and should be rejected</p> <p>The accompanying documents highlight how little is known about impacts on neighbouring suburbs from noise, light or traffic</p> <p>The lighting review is concerning</p> <p>While we believe neighbours may find acceptable an additional 10 lux in habitable rooms till 10pm at night, a high luminance along with the intensity, will not be tolerated. The brightness of LED luminaires in the field of view for nearby residents requires consideration</p> <p>The Noise Review is Concerning</p> <p>5 Assessment</p> <p>A noise assessment and reporting will be undertaken in accordance with the methodology presented in Section 2 above.</p> <p>Where required, should the noise emission from the proposed night racing exceed the relevant noise emission criteria, GHD will work in conjunction with the ATC to determine suitable mitigation options to reduce noise levels to acceptable levels.</p> <p>These two factors alone indicate the projects impacts will be great or best case unknown</p>	Refer to Section 4.3.1 and 4.3.4

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		Its is therefore hard to justify giving the project a State Significant assessment and we would like to see this go to an NSW Upper House Inquiry for future scrutiny and transparency	
	Doncaster Avenue Residents – Kensington – Safety and Public Disturbance	<p>The racecourse events already provide significant disruption to the local community and night racing will cause an unacceptable level of significant further disruption.</p> <p>We strongly object to night racing and, in particular, in the extreme manner proposed. This would have an enormous affect on local living communities and family living standards in the local area.</p> <p>For example:</p> <ul style="list-style-type: none"> - After each current race-day, there is already rubbish littered throughout the neighbourhood. We constantly have beer bottles littered on our streets and in our front gardens (among other rubbish and pollution). We currently have to clean up this mess. The racecourse needs to arrange cleaners to remedy this as it's not local individuals' responsibility to clean up their neighbourhood where the racecourse is responsible and makes profit from the events. The racecourse currently doesn't remedy or mitigate this significant issue and night racing will only exacerbate this problem. The racecourse should first be required to show a track record or remedying these issues before it should be permitted to contemplate extending race events late into the evening. - Noise on the streets after race-days and into the night is already present. Night racing will significantly extend the hours that this occurs. The Council needs to be very careful not to further disrupt locals who are already bearing the brunt of this. This is a family area. Recently there was a physical fight out the front of our house, so this is not only a noise pollution issue but a safety issue. We all know too well that there will be drunken patrons leaving the races and at such late times this cannot be accepted by locals. Currently the racecourse allows drunken patrons to leave into the local neighbourhood and washes its hands completely of any responsibility of them after they leave their premises. This should not be permitted by Council. - Notwithstanding the above, if night racing is approved, entry and exit via the Doncaster gates MUST be prohibited. The main entry on Alison road needs to be used to transport all racegoers immediately onto public transport and to prevent (at least to some extent) racegoers walking directly into the local residential area. This must be prohibited. 	Refer to Section 4.3.3
	Coogee Bay Precinct – Coogee – Traffic and Parking, Safety and Public Disturbance	<p>As per Resolution 25/21 of the Coogee Bay Precinct, Randwick City Council, I am making the following comments in opposition to the proposed provision of Night Time Racing.</p> <p>The members of the precinct are unanimous in opposition to this proposal because of the deleterious impact of racegoers descending on Coogee. This will occur before and more particularly after these night time events conclude at 10 pm.</p> <p>The consultation proposal is particularly flawed due to its lack of acknowledging the impact of racegoers on the Coogee Bay Area residential area. The accompanying assessment of public transport support is outdated and hence faulty.</p> <p>In relation to Public Transport, the proposal states:</p> <p>'The site is approximately 500 metres from the closest bus stops along Anzac Parade and Alison Road. Anzac Parade has a high frequency of services, which service surrounding suburbs and the University of NSW, as well as connecting to the Sydney CBD. It should be noted that at approximately 10pm (when the night racing is proposed to finish), bus service frequency is approximately every 10 - 20 minutes for services between Royal Randwick Racecourse and Central Station.'</p> <p>This reference to the importance of buses falsely assumes patrons will not venture to Coogee for further drinking etc. This false supposition, will leave the good citizens of Coogee with the joyless experience of drunken and disorderly invaders for the ensuing late night and early morning. Coogee is, as the project context states at 2.2, only 3 kilometres away. A downhill run for which the noise management plan is hauntingly silent on pre and post event noise at Coogee.</p> <p>The reliance on 'bus service frequency' is absolutely false given the intended changes to buses. The 'supporting' bus services are planned to be reduced drastically or removed totally as follows:</p> <p>Supporting bus routes to be or already withdrawn 338, 373, 376, 377, 391, 393, 394, 395, 399, L94, M10, M50; and to be reduced: 339, 374, 392, 397, 370.</p> <p>The report does not give any effort to managing this 'project context', while acknowledging:</p> <ul style="list-style-type: none"> * Australia's national terrorism threat level is Probable * There are no accompanying management plans for: 	Refer to Section 4.3.2 and 4.3.3

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		<p>- crowd,</p> <p>- emergency,</p> <p>- security,</p> <p>- terrorist attack,</p> <p>- drugs and alcohol,</p> <p>- crime and anti-social behaviour.</p> <p>In short, this proposal as it stands is a recipe for disaster on a national scale.</p> <p>Added to this is the re-emergence of Covid cases. Horse racing crowds welling in the Coogee Bay Area would only exacerbate associated health risks.</p> <p>These are a host of reasonable proposal related reasons to scrap the plans for night time racing. Added to these are the underlying issues of exacerbating gambling related harm by the introduction of any night time racing.</p>	
	Strata Plan 55999 – Safety and Public Disturbance	<p>RE: STRATA PLAN 55999 – 274-300 ANZAC PARADE, KENSINGTON NSW 2032</p> <p>NOTICE OF EXHIBITION – NIGHT RACING AT ROYAL RANDWICK RACECOURSE</p> <p>We write as the Strata Managing Agents of the above-mentioned Strata Scheme, under instruction from the Owner Corporation. The Owners Corporation (SP 55999) write to you in response to your letter dated 24 May 2021 (attached) 'Notice of Exhibition Night Racing at Royal Randwick Racecourse' in relation to the following concerns of the Owners.</p> <p>Except for the racecourse, this is a residential area and night-time noise restrictions need to apply – this Strata Scheme has thirty-seven (37) units and accommodates a lot of people. There are residential buildings all around the racecourse - including residential colleges at UNSW.</p> <p>Clearly these plans are for commercial activities so the aim will be to attract as many people as possible - up to 15,000 are estimated, creating more traffic, parking problems and noise in the area at night as people arrive and disperse. Trackside lighting will be intrusive as will loudspeakers/amplifiers and generators. If there are 16 events in the summer months, this means at least two weekends out of every four will have disturbances for residents.</p> <p>The Owners are very concerned to see the creation of a barbeque/refreshment area beside the fence to our private property and immediately below several balconies on our property. Inevitably there will be noise/music and barbeque smoke/smells.</p> <p>These events are planned for summer months when residents want to enjoy their balconies and have windows open. The Owners have by-laws in place, which are enforced, regarding smoke and noise drift interfering with residents' enjoyment of their property. How will barbeque smoke/smell drift and noise be managed so as not to disturb or discomfort our residents or negate our Strata Schemes by-laws?</p> <p>The Owners can also predict rubbish being thrown over the fence into the Common Property garden area and do not wish this to occur. The Owners strongly oppose this facility being situated in such close proximity to our property and would like the Department to reconsider the location of this area or implement strategies in order to compensate for the peaceful enjoyment of the Owners which will be impacted. Perhaps one strategy would be planting trees and/or installing noise buffering solutions to the proposed area.</p> <p>The Owners consider this project to be likely to have a detrimental impact on the value of the property and make it a less comfortable, attractive place to live. The Owners of Strata Plan 55999 look forward to the Department's response to their concerns outlined in this correspondence.</p> <p>Should you require further information regarding this matter, please contact our offices via 02 8218 9999 or via email at info@gkstrata.com.au.</p>	Refer to Section 4.3.3
Individuals	Submitter 1 – Noise	<p>I live on Doncaster Avenue in close proximity to the racecourse and the Doncaster Hotel.</p> <p>At present, I have a considerable issue with excess noise that results in me not being able to sleep at two times of the day.</p> <p>The time that there is excess noise early in the day is around 5:45am - 6:30am most days of the week (less so on Monday) when the masses of cyclists ride from Centennial Park on Doncaster Avenue towards La Perouse. Due to the state of the road and the number of cars that park on the bike lane, the groups of cyclists yell "hole", "middle", "car door", "left" and "right". To try to manage this, I have bought sound reducing curtains and additional soft furnishings, but it hasn't really helped.</p>	Refer to Section 4.3.1

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		<p>The other time that there is excess noise, is later in the day when an event has been on at the subject racecourse. This come (at a reasonable hour) when the masses of people are arriving, but more so at an unreasonable hour as they are either departing the racecourse or when they are kicking on to the Doncaster Hotel or departing the hotel.</p> <p>I don't mean to be unreasonable, but if the night racing is to proceed on the additional nights and I am being woken up by the cyclists in the morning, it doesn't leave a decent window for sleep. Some suggested remedies would be to either install better cycling infrastructure, limit traffic flow on Doncaster avenue, repair the potholes on Doncaster Ave and/or prevent the expanded operation of the night racing.</p>	
	Submitter 2 – Traffic, noise, Safety	<p>I am a resident who lives along Doncaster Ave and am objecting to the proposal to implement Night Racing at Royal Randwick Racecourse. There are several factors which contribute to this objection and I will highlight below.</p> <p>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 race course, this would add greater strain to an already busy road network.</p> <p>Secondly, the spill over affect of drunk racegoers is always evident in the area surrounding the race course. Incidents of people passed over on the sidewalk, crossing streets without looking at traffic, rubbish and litter, noise and rowdiness (especially around the Doncaster Pub) always occur during the usual racing season. There is almost a guarantee that this will occur especially during night racing as people will be attending as an after work gathering or instead of going into town on a Saturday night.</p> <p>Thirdly, there has been incidents of physical 'punch ups' along the street with a recent occurrence several months ago where a group of clearly drunk men were fighting along the Doncaster Ave / Alison Rd intersection. It is quite clear that some racegoers see going to the races as an excuse to get drunk, how will the ATC curb off excessive drinking. And even if attendees are evicted from the venue, what happens then? Does it no longer become the responsibility of the race course and simply the public's problem?</p> <p>There are many families which live in the streets surrounding along the Doncaster Ave side of Kensington, most have young families and children. The traffic, noise and safety concerns of residents are the primary issues as to why I am objecting to this proposal.</p>	Refer to Section 4
	Submitter 3 – Noise, Traffic, light spill	The introduction of night racing at Randwick racecourse will cause a great disruption to the nearby residents. The noise will be increased as well as traffic. Night lighting will disrupt the relaxation and peace of ratepaying residents.	Refer to Section 4
	Submitter 4 - Noise	Night racing will be a major disruption to my rest at night as I live extremely close to the racecourse	Refer to Section 4.3.1
	Submitter 5 – Safety and Public Disturbance	Objection due to: significant negative impact on local area & community safety including: increased lewd behaviour - currently on race days I have witnessed many people (mostly men) urinating on the street, fighting, aggressive behaviour, road rage, vomiting on public areas / footpaths; large amount of rubbish (mostly empty alcohol bottles & take away food containers) left on the streets after race days; behaviours continue late into the night disturbing sleep; all these increase feelings of unsafety in my home/ streets where I live - currently some race days I don't even venture out to the local shops -; excessive noise from people going to & from the event especially close to the Doncaster Hotel & adjoining bottle shop; I feel having night racing will actually makes these issues even worse (cover of night); excessive increased traffic already occurs on current race days - makes it very hard to drive anywhere - takes a lot of extra time, night racing will make this worse /extend the time period where traffic impedes locals movements; impact on street parking, ; increased potential for gambling & associated damages (both due to races & poker machines at the local pub); impact on police services attending to mentioned behaviours when there are more important issues they should be attending to.	Refer to Section – 4.3.3
	Submitter 6 – Noise	<p>I object to Night racing at Randwick racecourse primarily on noise concerns at night. Local Doncaster Ave residents have been subjected to years (5 years plus) of noise and pollution due to the light rail stabling yard construction. We are all fed up and sick of all the noise, vibration and light flooding our backyards and homes. We can not put up with another event that will cause lots of noise at night that will be another source of angst and stress for local residents. I have to go to bed early around 9pm due to work commitment and this need peace and quiet rather than more noise and extra people roaming around the streets, most likely to be intoxicated. It is already hard to live with the extra vibrations the teams cause when they move around the light rail stabling yard at night and it will make our lives even more difficult if night racing is allowed.</p> <p>It is already hard to find parking at night when I get home from work and if they allow night racing it will be even harder to find parking as race patrons will park in nearby streets to go to the races. The local residents do not need extra traffic in the area. I had on previous occasions had intoxicated race goers pee on my front garden and also ripping out fence</p>	Refer to Section 4.3.1

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		<p>palings as they are too drunk and do dares because of their friends. We do not need these people around at night because they will damage local properties especially if it's at night and they will do stupid things - please do not let this happen for local residents safety and property protection.</p> <p>These two main reasons alone means night racing should not go ahead as it will badly affect local residents around the racecourse and we have suffered enough already with the building of the light rail and also the stabling yard construction. All we want is some peace and quiet - not the AJC having their way to make a few bucks at the expense of local residents.</p>	
	Submitter 7 – Ecology	The exploitation of animals for humans to gamble on is deplorable. Horse (and any other animal) racing should not be expanded, it should be shut down.	Refer to Section 4.3.7
	Submitter 8 – Local Amenity	This project has the potential to destroy residential amenity for many suburbs around Randwick.	Refer to Section 4.3.5
	Submitter 9 – Noise, Traffic and Parking	<p>On race days all the noise from the races can be heard in our area, Whilst we accept that, it would be quite invasive to be home relaxing in the evening</p> <p>On race days many race goers park in our area. Again, coming home from work or a day out and not be able to find a parking spot anywhere near home is unacceptable, particularly for those with children, shopping etc.</p> <p>I have no political donations to declare.</p>	Refer to Section 4
	Submitter 10 – Safety and Public Disturbance, Sustainability and Lighting Design	<p>I am opposed to the proposal for night racing for a number of reasons:</p> <p>As a local resident, I am accustomed to race day inconvenience - audible race calling, traffic jams before & after, load inebriated patrons - but at least by 7pm the neighbourhood is quiet. The prospect of traffic jams & drunk patrons exiting the racecourse into our street after 10pm is alarming. I do not believe it could be adequately managed. Pedestrians are not supposed to exit onto Ascot St now but they do in large numbers.</p> <p>We have had big problems in the past with late finishing concerts in the racecourse. It is almost impossible to police poorly behaved patrons after dark and our safety & peace will be compromised.</p> <p>There are many night time activities available to the public in the area with no shortage of drinking & gambling venues. This proposal will not improve the local amenity.</p> <p>The installation of a massive lighting system that realise 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.</p> <p>The lighting of the precinct will greatly disturb the neighbourhood. The multilevel car park will be even more brightly lit with cars exiting with their lights on shining into neighbouring properties.</p> <p>I believe that this proposal should be rejected.</p>	Refer to Section 4
	Submitter 11 – Safety and Public Disturbance	Many of the current Royal Randwick racegoers leaving the racecourse are intoxicated, obnoxious, loud when walking past the building & use the building side access entrance as a toilet. The racegoers use to use the building refuse room as a restroom & it only stopped when the building strata installed a security device on the door. The racecourse authority does not manage or control the crowd movement once the racegoers have left the racecourse premises, leaving the community suffer from the consequence of the drunken clientele.	Refer to Section 4.3.3
	Submitter 12 – Sustainability, Noise, Lighting Design, Safety and Public Disturbance, Parking and Event Capacity and Management	This is a densely populated area with more and more units being built in the area, you are destroying our lifestyle and quality of life with your unreasonable growth targets, cramming more people into the area for night racing will make it worse. The only people who win here are the bookmakers and NSW Govt obtaining more tax revenue from gambling, the tax paying and rate paying residents will lose out again! I strongly oppose this idea, stick to day racing.	Refer to Section 4
	Submitter 13 – Economic	A wonderful initiative by NSW Govt. and ATC which will provide jobs for local residents and economic growth for the state and the local business community now recovering from the impact of Covid-19. Thoroughbred racing has been an important part of the fabric of the local Randwick community since 1842 and night racing will provide ongoing impetus to further the recreational benefits to the residents of and visitors to Sydney generally. We have a vibrant and successful racing industry in Australia that is the envy of the world and	Noted.

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		with forward thinkers working on projects like night racing this trend will continue. Congratulations to all concerned, can't wait to be there on opening night.	
	Submitter 14	<p>This is an appalling proposal. Not only is spending \$23 million on lighting a complete and indecent waste of money, this proposal would make the local area into some kind of entertainment district which would be very undesirable for local residents. It's such a ludicrous and self-indulgent proposal and those behind it should, instead, focus their efforts on contributing to worthwhile projects and causes rather than this abomination.</p> <p>Then, of course, there's the cruelty of horse racing itself, an activity (I won't call it a sport because it is anything but) that is losing its social licence and for VERY good reasons.</p> <p>This decadent and indecent plan needs to be scrapped. I cannot believe that someone would have the nerve, the audacity, and the avarice to even propose it in the first place. It is nothing but a circus of cruelty, greed, and poor taste all wrapped in one.</p>	Noted.
	Submitter 15 – Traffic and Parking, Foot Traffic, Noise, Parking, Public Disturbance, Light Pollution, other types of events	<p>As a local resident close to the racecourse, i am objecting to what I consider to be a gross misuse of the facility and to what will be a large problem for the amenity of all local residents.</p> <p>My issues with allowing night events (irrespective of the number of these events or what kind of event they are) are as follow:</p> <p>Traffic on race days in the local area is horrendous. Ubers, taxis, private vehicles all pile up around Doncaster Ave and adjoining streets making it impossible for local residents to leave or return home without encountering heavy traffic. This occurs throughout the event but peaks at the end of the events and lasts for hours afterwards. Allowing night racing will increase the frequency of these events, which is grossly unfair to local residents.</p> <p>Foot traffic around the local streets during and after these events is increased. With an increase in foot traffic comes an increase in noise. On Ascot street where I live, race day crowds commonly spill out of the Ascot Carpark exit into a neighbouring dog park and continue to drink and make large amounts of noise in the area. It's bad enough during the day when locals are trying to enjoy the space with their families, children and pets, but would be made worse at night when children and other household members are trying to sleep.</p> <p>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?</p> <p>Parking remains an ongoing problem in Kensington. The council has approved many new student accommodation types with large amounts of students moving in. Many of these buildings don't have parking levels. In tandem with this, race day events have always created huge parking issues for locals as racegoers take their spots by those wishing to avoid the carpark at the racecourse. Night events will deprive locals, especially on Doncaster Ave where many houses rely on street parking, of parking spaces. This will be a huge issue for families returning from events around Sydney and for those who are returning home from work. Local parking limits are not deterring race day parkers.</p> <p>Behaviour of members exiting the race course</p> <p>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.</p> <p>There have also been instances of bad behaviour by these racegoers, as they have pulled out street signs in the local streets, vandalized local playground equipment, thrown their used rubbish (bottles, cigarettes) into the gardens of local properties. Night time will only encourage this kind of behaviour even more when there is less visibility.</p> <p>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.</p> <p>Types of events</p> <p>As mentioned the Sydney Morning Herald, there are potential plans to allow other types of events such as Sky Diving at the racecourse. What guarantees does the government offer</p>	Refer to Section 4

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		<p>that events such as skydiving wont adversely impact local residents? What would happen if a diver hits a household's roof or lands on children playing in the backyard? It's an incredibly short sighted idea that only benefits the racecourse as an additional income source.</p> <p>This event is a great example of a gross misuse of the facility and opens pandora's box for other kinds of events to occur at the venue which would adversely impact local residents. What other events might also be offered at the racecourse at night? Would these events have similar or greater impacts on traffic, noise, light pollution, parking?</p> <p>This proposal must be rejected on the impacts mentioned above. Randwick racecourse is NOT an entertainment distract. It was not purpose built or planned for such a thing. There is a delicate balance for which this facility has to balance. These new plans throw the balance of this relationship out and favour those with money to make rather than local residents.</p> <p>Why does Sydney need night-time racing in addition to day time? What problem does that solve other than make the racecourse more money and promote greater levels of gambling in the community? There has to be a balance here and this plan should be rejected on the basis that it is not balanced or fair for locals.</p>	
	Submitter 16 – Ecology, Noise, Lighting Design	I object to the Racecourse in general (it's 2021 why are we still thrashing animals for spectator sport?) so I am also opposed to the idea of it expanding its operations and developing more infrastructure. Not only this, but the proposed Development will have adverse affects on noise and light pollution as well as the local environment. The night races will produce additional noise in an area with a lot of existing noise pollution (from Moore Park), it will add light pollution which is harmful to bird and bat colonies in Centennial park, and, the diesel generators would not only be loud but will consume a large amount of fuel which contributes to climate change.	Refer to Section 4
	Submitter 17 – Noise	This is a great idea, and I am also happy that it'll put the light rail to better use at night. However, I am concerned that this will cause unnecessary noise pollution for neighbouring residents. The proposal needs an emphasis on noise reduction	Refer to Section 4.3.1
	Submitter 18 – Ecology, Safety and Public Disturbance	<p>Thank you for the opportunity to lodge my submission regarding the Randwick Racecourse proposal to run 16-night racing events per year. I wish to strongly object, and submit just two, of so many, major concerns:</p> <p>1. Horse welfare issues and increased injuries:</p> <p>a. Horses are highly sensitive to light, with dark to bright lights causing confusion, anxiety and fear.</p> <p>b Changes from dark to bright light during transportation and racing carry serious welfare risks, including panic and injury.</p> <p>c. Racehorses already suffer a range of injuries - internal & external. Additional hours and longer days obviously increases the likelihood of even more.</p> <p>2. Industry participants have identified night racing as a threat to human welfare generally, and safety in particular as a consequence.</p> <p>a. According to participants, trainers and their staff already work long hours and adding nights makes it even more difficult and dangerous. As experienced in other locations, it is increasingly unsustainable - See my item 2b:</p> <p>b. The addition of night races in Queensland has caused an increase in staff turnover, which can negatively affect the horses as they are being left with less experienced handlers. This is a huge welfare issue and can result in more abuse and cruelty toward the horses.</p> <p>Source: https://www.punters.com.au/news/trainers-speak-out-over-welfare-concerns_195447/</p>	Refer to Section 4.3.7 and 4.3.3
	Submitter 19 – Traffic, Lighting Design, Ecology	<p>I Strongly OBJECT to night racing at Randwick</p> <p>The traffic, light, crowd noise will be negative</p> <p>This is not in the public interest</p> <p>This is extreme animal cruelty and promoting gambling</p> <p>How has this been classified State Significant? It is an abuse of Planning system</p> <p>The proposal should be rejected</p>	Refer to Section 4
	Submitter 20 – Safety and	I live on Doncaster Avenue Kensington. When I moved to the area I accepted that I would have to endure the traffic and noise associated with racing.	Refer to Section 4

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	Public Disturbance	<p>I didn't realise it would be as bad as it is though. Fist fights and abusive language out the front, young women crying in the gutter, vomiting in the street, traffic backed up, gridlock at the ascot street roundabout due to Taxis queuing across the intersection. I have even had young woman enter my front yard and urinate behind my hedge.</p> <p>I have young children who will be adversely affected by the additional noise we will endure late at night as a result of night racing. I implore you to consider the residents of Kensington who already put up with more than enough disruption to our daily lives due to racing.</p> <p>I would also like to point out that horse racing is a cruel industry that should not be condoned.</p>	
	Submitter 21 – Local Amenity	<p>I am the owner of Unit XX, Quinella Gardens, 274-300 Anzac Parade, Kensington. The block is a fence away from Randwick Racecourse. This is a residential area - there are homes and units on all sides of the Racecourse including student accommodation at UNSW. I am very concerned by the Australian Turf Club's proposals for night racing at Randwick - I think this activity will have a detrimental impact on the quality of life and therefore the value of my property. Given the commercial nature of the proposed activity, with the intention to attract large audiences, the residents of the area will be greatly impacted by increased vehicle and people movement and noise as they arrive and disperse. The prospect of bright trackside lighting is very disturbing as we've already had the awful experience of bright night-time lighting during the light rail building debacle. At least there was an end point to that. The proposal means that for 2 weekends a month in the summer months there will be considerable discomfort for those living in the area. The likely, relentless, noise from generators, loudspeakers and staged events will be impactful. We have Body Corporate By-laws in place, and enforced, to ensure neighbours do not disturb neighbours. How can our By-laws be effective if the Australian Turf Club has no consideration for its neighbours? What is to be done to mitigate noise drift? I have been very concerned to find that just on the other side of our fence and immediately below a number of balconies, a barbeque/refreshment area is being established. In the summer months residents want to be able to enjoy their balconies and have windows open. What is to be done about smoke/smell/noise drift from this area into our property? Again, we have By-laws that are likely to be negated by the operation of this refreshment area and given its informal nature, the noise, smell and rubbish likely to be thrown into our garden will impact adversely on our property and the comfort of residents. This Australian Turf Club proposal will result in a very uncomfortable outcome for residents and this is A RESIDENTIAL AREA. I do not wish my property to be devalued in this way nor do I want residents to have a compromised life style. Please take us into consideration. This Australian Turf Club proposal should not be considered until there is a full assessment and understanding of the impact on residents in the area.</p>	Refer to Section 4.3.5
	Submitter 22 – Safety and Public Disturbance	<p>I expressly state my objection to the introduction of night racing at Royal Randwick Racecourse. I am a clinical psychologist in private practice with over 30 years of clinical experience. I write on behalf of my patients and their families with gambling addiction concerns.</p> <p>I believe the introduction of night racing will bring an increase in problematic gambling. Current research outlines three primary predictors for this: Greater opportunity for placing bets, increased frequency of race meetings, and an increase in meeting accessibility to the wider community. Additional predictors include a wide range of bar and dining facilities, comfortable seating, venues easily accessed by car and public transport, and venues that provide a safe and secure social environment, with a lively atmosphere and hospitable betting areas. Randwick Racecourse boasts all of these features and more. The facility and specifically these events are marks of an inherently manipulative industry that will attract between 320,000 - 520,000 Australians experiencing moderate to significant problems from their gambling every year.</p> <p>Studies have shown that people are more likely to gamble at night. The addition of night races at Randwick leaves the community vulnerable to the insidious effects of gambling addiction. Mental health implications are well documented and include depression, anxiety and stress-related disorders such as sleep disturbances and disordered eating. Those who partake in gambling are statistically high risk for alcohol and substance abuse, and are three times more likely to attempt suicide. These numbers increase further where there are pre-existing mental health concerns.</p> <p>Sadly, these risks extend to the families of those who gamble as well. Studies have shown burnout to be common within the families of gamblers, where the focus is so consistently placed on the person gambling, and ongoing financial problems, that the needs of other family members are neglected. Domestic violence is of higher concern when one or both partners partake in gambling. Children are particularly vulnerable, and will often link a parent's gambling to their behaviour, believing they are responsible. Children of adults with gambling problems will often have lower grades than their peers. Shockingly, they are two times more likely to attempt suicide.</p>	Refer to Section 4.3.3

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		<p>With the night races proposed to take place between 6 and 10pm on weeknights, it is my belief that the community will suffer. These are hours best suited to spend at home, fostering the family environment. These are the hours when we eat together, when parents read their children stories and put them to bed, and when partners enjoy the benefit of one on one time. Throughout my years in clinical practice, I have never seen any good come of a parent or spouse spending these hours outside the home in an environment such the races.</p> <p>I object to the proposed night racing at Royal Randwick Racecourse.</p>	
	Submitter 23 – Safety and Public Disturbance	<p>The noise and traffic for the neighbours and local Community plus the bright lights is not acceptable. They have enough to contend with due to Light Rail holding yards so close to their homes.</p> <p>I object to the Horse Cruelty that goes hand in hand within this industry and feel that the horse don't need to be pressured to perform at even more venues.</p> <p>Horseracing feeds the gambling Industry and means more possibilities for people to "lose their pants" !</p> <p>This has NO advantage to our State coffers or the public at large</p>	Refer to Section 4.3.3
	Submitter 24 – Ecology	<p>I strongly object to any form of night racing.</p> <p>Any form of horseracing is cruel and unethical, and in particular, night racing for the following reasons for horses and humans.</p> <p>1. Horse welfare issues and increased injuries:</p> <p>a. Horses are very sensitive to light and can be frightened by bright lights. Changes from dark to bright light can cause issues during transporting and racing.</p> <p>b. Racehorses are already at risk of injuries, and additional hours and longer days may only increase the risk.</p> <p>2. Industry participants have identified night racing to have threats to human welfare.</p> <p>a. According to participants, trainers and their staff already work long hours and adding nights makes it more difficult.</p> <p>b. The addition of night races in Queensland has caused an increase in staff turnover, which can negatively affect the horses as they are being left with less experienced handlers. This is a huge welfare issue and can result in more abuse and cruelty toward the horses.</p>	Refer to Section 4.3.7
	Submitter 25 – Noise, Traffic and Parking, Safety and Public Disturbance	<p>We strongly oppose the night racing at Randwick. The noise from the diesel generators to run the trackside lighting will be a constant annoying disruption for local residents. Car parking for local residents will also be an issue. We will have to park further from our homes & walk in the darkness which is a real safety concern. 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.</p>	Refer to Section 4
	Submitter 26 – Safety and Public Disturbance, Noise, Traffic and Parking	<p>My family and I are utterly disappointed to learn about "possible" night racing at Royal Randwick Racecourse. As residents we already endure more than our fair share on weekends and definitely do not want to suffer during the week.</p> <p>We experience every race day the:</p> <p>* toxic state of Patrons which includes drunk brawls with our front gate constantly being damaged.</p> <p>* Patrons who trespass on to our property to help themselves to our side tap to either wash themselves down after vomiting in our garden bed or just because they are thirsty!</p> <p>* Numerous empty beer bottles littered into our garden bed</p> <p>* The selfish act of taking resident's 1 hour car spot because they produce a disable permit (mind you not disable at all!) or just take the risk</p> <p>* The noise pollution which will cause a disruption to my family and more importantly young kids who need their sleep during the week to be able to function for school</p> <p>* Lastly, the possible damage to our cars from drunk Patron's who think it is "NORMAL" to key cars on Doncaster Ave after having a BIG DAY! (Police involved)</p> <p>As you can read I am totally against any additional race days especially during the week. Think of the resident's for a change and their lives. You introduce say "4" nights of race</p>	Refer to Section 4

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		<p>night during the year for 2021 and set a precedent with it only increasing over time. NO, this needs to STOP. Who is policing the Patron's and all their stupidity when they leave the premise ? The Resident's need to be heard and their safety and well being needs to be put first.</p> <p>Thank-you for taking the time to read my submission. Diana</p>	
	Submitter 27 – Safety and Public Disturbance	<p>There has not been adequate and thorough public consultation to properly gauge the community opinion on this matter. Night time racing will on balance have a deleterious impact on individuals, families, and the community in general.</p> <p>I therefore strongly object to this proposal.</p>	Refer to Section 4.3.3
	Submitter 28 – Noise, Traffic and Parking	<p>Light Rail Stabling yard creates noise levels that impact residential living already.</p> <p>Property is vandalised during daytime races and at night there is more risk.</p> <p>Traffic levels are exceedingly high already, this activity will exacerbate this</p> <p>Damages caused by Light Rail construction and noise mitigation have not been repaired or addressed</p> <p>New student accommodation being build @ 18 Doncaster Avenue will cause more traffic and noise which night racing will exacerbate</p> <p>On street parking is minimal already, students will take more of the spaces</p> <p>The cycle lane being built on our side of Doncaster Avenue will cause further disruption and decrease parking spaces for residents further.</p> <p>Leave us alone</p>	Refer to Section 4.3.1 and 4.3.2
	Submitter 29 – Traffic and Parking, Noise, Safety and Public Disturbance	<p>Object - I think the residents of Kensington has endured enough disruption to our lives.</p> <p>1. Traffic congestion - due to the changes imposed by the light rail project, Doncaster Ave, Todman Ave and Alison Road in particular has been a traffic nightmare on a daily basis</p> <p>2. Anticipated noisy and disruptive pedestrian traffic in residential area- we already experience this during race days and other racecourse events- hosting additional evening events interrupts residential well being, compromises the safety of our young families.</p> <p>I have personally witnessed and reported on bad behaviour of drunken patrons scratching our cars, using our gardens as a toilet or vomit area, kicking in our fragile fencing, pulling out our plants, tipping our bins for fun and even smashing our pot plants from our gardens.</p> <p>Parking- with the light rail project, we have already had to sacrifice many parking spots. To add insult to injury, the many construction sites in Kensington has led to more workers taking our parking spots. When these buildings are complete, parking will become even scarce as many of these buildings have been designed with minimal parking with the assumption that all residents will take the light rail. Evening racing will make it even that more difficult to secure a parking spot</p> <p>Light rail- residents are suffering from the 24 hour lighting and operational noise from the light rail stabling yard. Residents have not received any form of mitigation.</p> <p>Evening racing will create more noise, more stadium lights, more anxiety for residents! Every evening as we are finally able to 'retire' from the day, we then have to battle with light tail stabling yard activity or Syd water digging or additional</p> <p>Approval for work permits for construction to continue with concrete pours.</p>	Refer to Section 4
	Submitter 30 – Noise, Traffic and Parking	<p>Kensington is a residential area with many young families. Late night events are not in character with this slow and peaceful environment.</p> <p>The noise and disturbance of intoxicated patrons experienced after daytime races, is likely to increase after dark.</p> <p>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.</p> <p>Overall, this proposal will boost revenue for the racecourse at the expense of the residents.</p>	Refer to Section 4.3.1 and 4.3.2
	Submitter 31 – Event Capacity and Management	<p>For night racing events to be successful, free access to these events should be given to neighbouring landowner/ occupier. This will guarantee that attendance will be good and everyone will enjoy these events.</p>	Refer to Section 4.3.10

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	Submitter 32 – Safety and Public Disturbance, Noise	<p>The racecourse events already provide significant disruption to the local community and night racing will cause an unacceptable level of significant further disruption.</p> <p>We strongly object to night racing and, in particular, in the extreme manner proposed. This would have an enormous affect on local living communities and family living standards in the local area.</p> <p>For example:</p> <p>After each current race-day, there is already rubbish littered throughout the neighbourhood. We constantly have beer bottles littered on our streets and in our front gardens (among other rubbish and pollution). We currently have to clean up this mess. The racecourse needs to arrange cleaners to remedy this as it's not local individuals' responsibility to clean up their neighbourhood where the racecourse is responsible and makes profit from the events. The racecourse currently doesn't remedy or mitigate this significant issue and night racing will only exacerbate this problem. The racecourse should first be required to show a track record or remedying these issues before it should be permitted to contemplate extending race events late into the evening.</p> <p>Notwithstanding the above, if night racing is approved, entry and exit via the Doncaster gates MUST be prohibited. The main entry on Alison road needs to be used to transport all racegoers immediately onto public transport and to prevent (at least to some extent) racegoers walking directly into the local residential area.</p> <p>Noise</p> <p>Noise on the streets after race-days and into the night is already present. Night racing will significantly extend the hours that this occurs. The Council needs to be very careful not to further disrupt locals who are already bearing the brunt of this. This is a family area. Recently there was a physical fight out the front of our house, so this is not only a noise pollution issue but a safety issue. We all know too well that there will be drunken patrons leaving the races and at such late times this cannot be accepted by locals. Currently the racecourse allows drunken patrons to leave into the local neighbourhood and washes its hands completely of any responsibility of them after they leave their premises. This should not be permitted by Council.</p>	Refer to Section 4.3.1 and 4.3.3
	Submitter 33 – Ecology	Funding of animal cruelty and horse racing must stop - it is completely outdated and barbaric. Instead of phasing out, like other progressive countries, we continue to fund these events which is completely unacceptable. These funds should be allocated to something better and ethically acceptable to the community.	Refer to Section 4.3.7
	Submitter 34 – Lighting Design, Noise, Public interest	<p>Randwick and surrounds have been vandalised over the past years with the 3 billion \$ lemon of a light rail losing thousands of significant trees many of which are around Randwick race course area despite many objections of the public so yet more noise is UNACCEPTABLE no matter how the your dept spins what they assess is acceptable - if the people who work in NSW DPIE think this is acceptable it should be moved to the Pittwater area and lets see how much support it gets there</p> <p>as per your website documents and appendixes below highlight how little is known about impacts on neighbouring suburbs from noise, light or traffic</p> <p>The lighting review below that your dept has posted is concerning</p> <p>“While we believe neighbours may find acceptable an additional 10 lux in habitable rooms till 10pm at night, a high luminance along with the intensity, will not be tolerated. The brightness of LED luminaires in the field of view for nearby residents requires consideration”</p> <p>The Noise Review is Concerning</p> <p>“A noise assessment and reporting will be undertaken in accordance with the methodology presented in Section 2 above.</p> <p>Where required, should the noise emission from the proposed night racing exceed the relevant noise emission criteria, GHD will work in conjunction with the ATC to determine suitable mitigation options to reduce noise levels to acceptable levels.”</p> <p>Its is impossible to justify giving the project a State Significant assessment and we would like to see this go to an NSW Upper House Inquiry for future scrutiny and transparency</p> <p>This project in NOT in the public interest only more developers or gambling already at horrific levels and should be rejected</p>	Refer to Section 4
	Submitter 35 – Local Amenity, Safety and Public	I am very concerned about the implications of the proposal to initiate night racing at Randwick.	Refer to Section 4

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	Disturbance, Ecology	<p>I cannot see any positives in this proposal.</p> <p>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.</p> <p>There is no need for increased horse racing which already causes untold damage to the lives of the horses who are compelled to run the races and also to the livelihoods of people who gamble on the races.</p> <p>I sincerely urge you to reject this proposal.</p>	
	Submitter 36 – Ecology, Safety and Public Disturbance	<p>I am very concerned about the proposed night racing events at Randwick Racecourse. The racing industry has a poor record for animal welfare, with 7 deaths, 124 injuries and 317 horses overwhipped in NSW in May alone. Night racing has been shown in Queensland to add more risks, due to the high staff turnover, which leaves horse with less experienced handlers. In addition, horses are sensitive to bright lights and will be enduring longer days, both which increase the risk of injury and death.</p> <p>I have been a high school teacher for 18 years, 14 of which have been spent in Sydney schools. I am well aware of the impact of alcoholism and gambling on families, and the impact of normalising access to it. People tend to drink and gamble more at night or evening events. This is utterly inappropriate in an area with so many large local schools and a university. Our young people should not be taught that drinking and gambling around the clock is normal and socially acceptable. They certainly should not see that local politicians think that this is acceptable and to be encouraged.</p> <p>At the supposedly family friendly event at the racecourse before Christmas there was a fight where children narrowly escaped getting hurt and were very distressed. It's not appropriate to have regular large events where people drink and fight late at night in an area with so many young families.</p> <p>As someone who goes past the racecourse to go to and from work every day, I am very familiar with the area and feel sorry for the people who live nearby. I note that measures have been taken to mitigate the impact of light on nearby homes but they will still suffer some impacts. Having endured a year of roadworks and other night time works on Brook Street during the past two years, I am fully aware of how intrusive and disruptive it is. Randwick is an expensive area to live in and many local residents are paying high rent to live in the area, in order to serve our community by working in our universities and hospitals. They don't deserve to have their home life disrupted in this way an average of once every two weeks during the racing season.</p> <p>I would appreciate it if you would consider the impact on animal welfare, young people in the area and local residents whose homes will be disturbed by the lights.</p>	Refer to Section 4.3.3 and 4.3.7
	Submitter 37 – Safety and Public Disturbance, Lighting, Noise, Event Capacity and Management	<p>I strongly object to the application for night racing to be held at Royal Randwick Racecourse as it is not in the public interest.</p> <p>Racing generally is dominated by the gambling and gaming industry. Any increase in the number of racing events increases the exposure to people to gambling and cannot be in the public interest. As evidenced by the number of gambling/gaming advertisements on television, often in times slots watched by children and young adults, our government has no interest in controlling this gambling epidemic. Studies show that gambling addiction, particularly when introduced at a young age, is extremely difficult to break and can lead to a lifetime of gambling.</p> <p>Studies also show a serious consequence of gambling has been an increase in domestic violence, particularly against women, which occurs when the partner losses one's wages.</p> <p>Events held at night at Randwick Racecourse necessitate the introduction of lighting for the whole track and amplification of the event.</p> <p>The lighting report has little by way of recognising the adverse impact on the surrounding homes. Light spill, as has been evidenced in many night venues, is a serious consequence of events held at night. It is not reasonable that the community should have its residential amenity adversely compromised by this intrusion.</p> <p>The Noise Review is of concern.</p> <p>Its wording clearly recognises there will be adverse impacts- 'where required, should the noise emission from the proposed night racing exceed the relevant noise emissions criteria, GHD will work in conjunction with the ATC to determine suitable mitigation options to reduce noise to acceptable levels'. This clearly indicates further reviews are necessary. Our experience with concerts, events at the stadia etc, do not decrease noise levels when complaints are made. By the time the report is examined and assessed the event is over. Additionally, there will be four diesel power generators running to whole period of the night racing and obviously, as a safety measure, for some time afterwards. This continual drone of the diesel is hard to avoid and is an extra impact on the surrounding residents.</p>	Refer to Section 4

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		<p>Noise from the Night racing will impact of the birds and wildlife in nearby Centennial Park and on the pets of neighbours.</p> <p>I find it difficult to accept the disproportionate amount of money poured into Royal Randwick by the Government.</p> <p>Since 2003 the highest attendance figures were in decreasing order.</p> <p>10/2019 Everest 40,912</p> <p>10/2018 Everest 40,578</p> <p>08/2018 Winx last race 11,792,</p> <p>10/2020 Everest 11,000</p> <p>It should be noted the Everest event is very highly advertised and promoted as the richest horse race in Australia and Winx was a magnificent once in a lifetime winning horse.</p> <p>These are very poor figures and indicate the racing industry is desperate to increase attendances . If people do not flock to the races on fine sunny afternoons why would they attend meetings at night.</p> <p>There is no way one can classify this as a project of State Significance and it is certainly not in the public interest.</p>	
	Submitter 38 – Noise, Traffic and Parking, Safety and Public Disturbance, Lighting Design, Local Amenity	<p>I am a resident with a young family that lives next to the racecourse. Our house sits immediately next to the racecourse, and we are affected by all race related activities. I have a young baby which I often have trouble getting to sleep, and the noise created by night racing, particularly the announcing over the speakers, is extremely likely to wake my child up. Normally this happens during the day only, and at night we have a reprieve, but approving night racing will change this.</p> <p>The increase in race traffic influx will overlap with the peak hour traffic exiting the suburb after work in the afternoon, which will cause total traffic chaos. I am also a doctor who works at the nearby Sydney Children's Hospital and Prince of Wales Hospital, and need to rapidly make my way to work in emergency situations when on call. Extra traffic will impair my ability to exit my driveway, which has already occurred previously before any additional traffic has started.</p> <p>The constant flow of patrons from the racecourse to the nearby pub The Doncaster Hotel also poses problems. The overwhelmingly inebriated crowd are very loud, and leave rubbish such as half drunks alcohol bottles all bout the streets, and even in my garden and front fence. Pushing this occurrence later back into the evening yet again causes unacceptable noise problems.</p> <p>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.</p> <p>All up, the proposed night racing provides absolutely no benefit to the people who actually live in the suburb. There is no increase in amenities, no compensation. Racing still happens, and can happen during the day as it currently does. The whole project only serves to inconvenience the residents, and should be thrown out completely.</p>	Refer to Section 4
	Submitter 39 – Noise, Lighting Design, Traffic and Parking	<p>I oppose the submission due to increased noise, light and traffic congestion.</p> <p>This is an addition to the ongoing issues which are still affecting my property of Unit 5 36 Doncaster Ave</p>	Refer to Section 4
	Submitter 40 – Noise, Light, Traffic, Parking, Safety and Public Disturbance, Sustainability, Noise, Visual Impacts,	<p>Noise pollution</p> <ul style="list-style-type: none"> * Noise tannoy, crowds, music, car traffic and drunken footpath traffic will have a detrimental impact on residents with children, their quality of life for sleeping, studying and relaxing * Generator noise impact and location have not been considered. <p>Light pollution</p> <ul style="list-style-type: none"> * This is a residential area and the “spill” light described will have a direct and significant impact on our living and sleeping spaces * This is not feasible for young children and family living * Dimming the lights between races is an inadequate solution to this problem and will not mitigate the impact. <p>Traffic congestion</p>	Refer to Section 4

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		<p>* Doncaster Avenue is already overused and not intended for the current volume of traffic, let alone increasing it</p> <p>* This has been exacerbated by the introduction of the Tram line which redirects traffic from ANZAC Parade to Todman Avenue to Doncaster as the only route (right turn) to Alison Road and Randwick</p> <p>Impact on residents parking</p> <p>* There is already a lack of parking in the area and it is consistently difficult for residents to find on street parking after 5pm</p> <p>* This will be exacerbated by the proposed residential towers on Todman/Anzac (Todman Square) with 1500 additional residents and limited parking facilities and is the night racing proposal taking this into consideration?</p> <p>* Adding additional pressure on an already highly congested area is poor planning and highly insensitive to residents, specifically elderly or young families who will struggle to park close to home</p> <p>Safety & Anti-social behaviour</p> <p>* Noise, Littering, Loitering, Drunken behaviour, Abusive, foul Language, Broken glass, Damaged cars are already highly undesirable issues on race day in this residential area.</p> <p>* Footpaths are currently unsafe on race day for unaccompanied young teenagers to be taking the dog a walk, cycling or running.</p> <p>Dangerous precedent</p> <p>* We are concerned the investment and installation of night lighting will set a precedent and encourage additional night time entertainment activities in the future</p> <p>Environmental impact</p> <p>* Non renewable energy sources being used to run generators and power lighting. Lack of sustainable development consideration</p> <p>* Impact of noise from circling airplanes, event music will be incredibly intrusive</p> <p>* Skydiving planes reach over 100 decibels and cause vibrations. Does this meet environmental noise regulations for residential area bearing in mind that authorities are granting licences but don't test aircraft noise at full throttle which is what planes fly at.</p> <p>* Creates a disproportionate sonic footprint on our community and has a profound degradation of the local environment</p> <p>* Reports from existing sky diving residential communities document this impact clearly.</p> <p>* Impact from circling planes and 40 skydivers and parachutes</p> <p>Sunday drop day</p> <p>* This is a day of rest and relaxation and not in keeping with Christian values</p> <p>Supporting research</p> <p>* There is extensive research and reports detailing the nuisance of skydiving in particular the noise made by circling aircraft.</p>	
	Submitter – Traffic and Parking, Noise, Safety and Public Disturbance, Lighting Design, Local Amenity, Sustainability, Visual Impact	<p>Andrea & Derek Davidoff</p> <p>Night racing at Royal Randwick Racecourse (SSD-8707)</p> <p>We wish to object to this project proposal on the following grounds:</p> <p>Night Racing Objections</p> <p>1. EXCESSIVE TRAFFIC CONGESTION</p> <p>The immediate area is already under extreme pressure from congestion due to the current frequency of race meetings and other events held at the site> Congestion has been exacerbated by the Light Rail route which funnels all traffic onto Doncaster Avenue. Our family has owned property on Doncaster Ave for 60 years and the congestion now is so extreme that the street is a carpark on race days. The roundabout at the junction of Doncaster Ave and Ascot Street coincides with the entry/exit to the racecourse carpark and creates a bottleneck and long delays. Doncaster Ave has historically been a residential street and is not equipped to deal with the traffic that it is required to carry. The proposal is expected to bring up to 30,000 people to the area. This is clearly alarming for residents as it has a significant impact on their amenity.</p>	Refer to Section 4

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		<p>2. EXCESSIVE NOISE</p> <p>There is already excessive noise on Race days and local residents have the right to expect some reprieve in the evening when families are putting their children to sleep. The noise is a huge problem as there is no way to filter it out and it is at times distressing and detrimental to family life.</p> <p>3. INCREASED FOOT TRAFFIC</p> <p>The expected and very substantial increase in foot traffic is highly undesirable. Currently, residents have to put up with large volumes of people exiting the venue on foot and creating excess noise and congestion which impacts on their amenity. Increasing both the number and scale of race meetings will create an unreasonable burden on residents.</p> <p>4. INCREASED DISTURBANCE</p> <p>Due to the large volume of foot traffic residents are already having to deal with drunk and disorderly behaviour on a very regular basis. At times we have had to deal with drunk patrons vomiting on our front garden and waking sleeping children. This is a problem with day Race meetings. Allowing Night Racing will substantially exacerbate the problem as patrons are more likely to drink excessively at these events and attendance numbers are projected to be far greater than what is already a significant problem.</p> <p>The erection of 79 light poles is an alarming prospect for local residents. This is clearly very unreasonable to expect a residential neighbourhood to endure light emissions on this scale. There will be no way to filter out the light (and noise!) . Families will again be expected to carry this burden which will significantly impact on family life without any recourse. This is NOT an entertainment precinct like the SCG and Football stadium. How will the light emissions be ameliorated??</p> <p>6. SECURITY CONCERNS</p> <p>Encouraging large numbers of people to the area will exacerbate safety concerns both due to the proposed Sky Diving Events and Night racing. We have had to put up with intruders on our property numerous times as people look for a quick entry into the venue by jumping our back fence. This is clearly frightening and unacceptable particularly for young families and elderly residents.</p> <p>9. SETS A DANGEROUS PRECEDENT</p> <p>We are concerned that once this proposal goes through this will establish a dangerous precedent to additional night-time entertainment which will be intolerable for residents.</p> <p>7. PARKING</p> <p>The area already has significant issues with parking which is very limited after 5pm. Currently, our family struggles to find off street parking to unload young children and prams and is sometimes forced to park many blocks away from home. The proposal will in our view severely exacerbate the parking difficulties in the area.</p> <p>8. INTANGIBLE IMPACTS ON AMENITY</p> <p>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.</p> <p>1. EXCESSIVE NOISE</p> <p>The idea of flying small planes over a built up area at night is unreasonable by any measure. This is when young families are trying to settle children to sleep and they have the right to peace and quiet in the evenings. Light planes circling and doing climbs during skydiving events can produce very high levels of noise pollution (up to 100 decibels). There is NO way to filter out this noise. This will have considerable adverse effects on the health and well being of residents and will significantly affect the amenity of the local neighbourhood.</p> <p>2. EXCESSIVE LIGHT EMISSIONS</p> <p>The amount of light produced by the installation of 79 light poles will have adverse effects on local residents and fauna.</p> <p>3. POLLUTION</p> <p>There is likely to be increased CO2 emissions from the skydiving planes. Skydiving is well known to be one of the most environmentally damaging activities. Burning fossil fuels for fun and profit seems very insensitive both to the needs of residents and to the environment.</p> <p>4 SAFETY CONCERNS</p>	

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		<p>Residents have legitimate safety concerns as Skydiving is a high risk activity. As our property is within the drop zone location, we are very concerned about this and believe it is NOT a suitable activity for a built up area. Skydiving planes doing repetitive climbs pose a significantly greater mid-air collision hazard than other aircraft. Who will indemnify local residents in the event of an accident?</p> <p>5. VISUAL INTRUSION</p> <p>There will be significant visual impacts from strong light emissions and circling planes. Residents should not have to carry this added burden.</p> <p>We urge the Department of Planning Industry and Environment to REJECT this proposal as it will have profound and large scale impact on local residents. Once approved, the area will just drown in noise and congestion. Our neighbourhood does NOT need more commercial activity driven by nothing more than the profit motive. How does the ATC plan to compensate local residents for loss of amenity?</p>	
	Submitter 42 – Safety and Public Disturbance	<p>I live a couple of blocks away from Randwick Racecourse, near the Randwick bus depot. The unruly behaviour of the people leaving the races is unpleasant to see during the day, but the same thing at night would be feel unsafe to be around. There are groups of drunk men walking home from the races, often sexually harassing groups of young women who are dressed up for an outing and also drunk. The flavour of this at night would be very different and quite threatening. It would make the neighbourhood feel unsafe for women who are heading home alone after dark, including residents (I say this as a woman who lives in the neighbourhood). I have several times seen people urinating on the nature strip. Again, gross during the day time, but it would be quite threatening as a woman to be walking home at night and walk past a man with his pants undone.</p> <p>People don't just get drunk at the race course, they get drunk in advance on their way to the race course, leaving empty alcohol cans and bottles as litter along the street. All of this happening at night will be a horrible burden on the neighbourhood.</p>	Refer to Section 4.3.3
	Submitter 43 – Safety and Public Disturbance	<p>Saturating an area, such as Randwick with one industry such as racing is interfering with the present balance within the area.</p> <p>Residents have had to endure the issues associated with the establishment of Light Rail in the area. Centennial Park has had many of the trees removed for the sake of the Light Rail and a section of Public land removed from public use.</p> <p>Extending the influence of Randwick Racing Industry with the installation of lights for Night Racing will provides a catalyst for resentment among residents. The Good Will that has been fostered over many decades has the potential to be eroded.</p> <p>Over the years residents have had to endure traffic issues associated with Randwick Race Meetings. Now, residents have to compete with the usual Race Meeting traffic, as well as the Light Rail impact. The close proximity of the traffic lights to each other, dramatically impacts on traffic flow. The thought of Night Racing at Randwick Racecourse adds to the negative influence on local residents. Thus, planting the seed for resentment and lowering the inviting atmosphere of the Randwick precinct.</p> <p>Randwick has the potential to become an unfriendly suburb in which to live caused by the effects of the possibility of Night Racing.</p> <p>Where is the justification for this proposal to be a State Significant Development? It clearly does not meet the guidelines sent down by the Dept of Planning, Industry and Environment so how can .the Dept even consider this project.</p> <p>The ATC continually state that night racing will continue at Canterbury, but having so many night meetings , approx. 25, over the period between October and April, means that there will be nearly one night meeting a week during that period.</p> <p>How can the ATC be taken seriously, to say that they will run night meetings at both Racetracks.</p> <p>Your Dept should consult the racing industry, i.e talk to the people who will be actively involved, e.g trainers, strappers and jockeys on their thoughts. Controlling 500 kg horses is not easy.. There are health implications if there are that many night meetings. I am sure that nobody would want to be responsible for any accidents.</p> <p>The pen pushers or those that sit in their high chairs in the Chairman's Lounge in the Queen Elizabeth II building should not have any input or have their opinions considered.</p>	Refer to Section 4.3.3
	Submitter 44 – Event Capacity and Management, Sustainability, Traffic and	<p>As a resident of Kensington, I am objecting to the proposal by the Australia Turf Club to host 16 nights of races here at Royal Randwick racecourse. There are several reasons not adequately or fairly addressed by the ATC as part of the proposal submittals. It is irrefutable that the ATC's proposal for night races would further erode the liveability of this</p>	Refer to Section 4

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	Parking, Local Amenity	<p>mostly residential area and jeopardise the well-being of many highly productive people who work in the nearby health and education precincts.</p> <p>First and foremost, I believe it is vital to comprehend that this racecourse sits within what has become a densely populated residential area in Sydney – which has a diverse and productive work population – that primarily serves the health and education precincts of Randwick/Kensington. Royal Randwick Racecourse has five sides (or frontages, whichever term is the more appropriate here). Three of which are directly adjacent to medium density residential neighbourhoods (Doncaster Ave, Alison Road and Wansey Road) with minimal setbacks, another side faces the education and health precincts (High Street – which COVID-19 aside, would normally hosts up to 2,800 students living in student accommodation predominately facing the racecourse along High Street) and the final frontage being the smallest and least consequential of the five (5) frontages, Centennial Park. To keep things simple, I have broken my objection in the following 7 key points.</p> <p>1. In several reports submitted by the ATC for their night racing proposal, the ATC has continued to use Canterbury and Toowoomba racecourse as a ‘supportive precedence’ for night racing without detailing and specifying the urban conditions that those two other racecourses are in compared with that of Royal Randwick Racecourse. The conditions are very different. Both those racecourses sit in areas that have a significantly lower population densities with the bulk of the dwellings being detached houses with private driveways and furthermore they are not within ‘arm’s-length’ of State significant health and education precincts as is the case for Royal Randwick Racecourse. There are very minimal setback distances between the racecourse at Randwick and the residential neighbourhoods that surround it. Similarly, the MCG (another precedent used by the ATC) does NOT sit within a predominately residential neighbourhood. It is surrounded by 35 hectares of green space on one side (Yarra Park) and then the Melbourne Olympic Precinct on the other side. Significantly fewer people are affected by events held at the MCG and the handful of dwellings that are built and/or sold are done so with the prior knowledge by the buyers/occupiers that they are near the MCG. Lastly, the MCG, Canterbury and Toowoomba racecourses do not sit adjacent to State significant health and education precincts like Royal Randwick racecourse, nor are they bounded by two main arterial roads that feed an entire LGA.</p> <p>2. In August 2020, the State government gazetted significant amendments to Randwick LEP 2012 concerning Kensington & Kingsford. The amendments are substantial with dozens of new block controls allowing for high-rise development (up to 18 storey) at several key nodes and mid-rise developments on many other blocks (up to 9 storey). There are currently several DAs for 18 storey residential developments that have gone to the NSW Lands and Environment court for approval. With this knowledge, it is too soon to determine what consequences will arise as a result of the recent LEP amendments. However, these amendments aim to further increase the residential population density which will inevitably put increased pressures on an already frustrated road network, public amenity and an increase in pollution levels leading to a decrease in liveability. The LEP amendments for Kensington and Kingsford will not only affect the areas directly adjacent to Royal Randwick Racecourse, but the whole catchment area as Alison Road and Anzac Parade are the two main arterial roads feeding the entire LGA of Randwick City Council. Thus, some of the assessment reports supplied by the ATC (such as the one regarding traffic) will be incorrect and out-of-date once the amended LEP for Kensington Kingsford starts to physically manifest in built form.</p> <p>3. The ATC has proposed the use of Diesel engines to power their lighting requirements. It is misleading and deceptive for the ATC to claim in one of their reports (in Appendix E) that their diesel engines conform to ‘Environmentally Sustainable Design’ (ESD) initiatives. There is nothing sustainable about diesel engines. There is conclusive evidence in many leading scientific reports that diesel engines are more harmful to the long-term health of humans than most other sources of non-renewable energy. Yes, diesel engines produce less CO2 than other non-renewable energy sources, HOWEVER, they produce significantly higher levels of by-products that are even more harmful to humans’ health such as Nitrogen Oxide, Nitrous Oxide and Nitrogen Dioxide and high concentrations of PM 2.5 (the pollution that gets into people’s lungs and increases the likelihood of premature death by cancers). Thus, it is irrefutable that this needs further investigation as it is completely unfair and unreasonable to subject residents, students, patrons and workers of the nearby education and health precincts to extra pollution for the sake of a few people at the ATC increasing their profit margins to the detriment of others’ long-term health.</p> <p>4. Have NSW EPA been informed of the proposal for night racing at Royal Randwick Racecourse with the explicit knowledge that the ATC propose using diesel engines across the site to fulfil their lighting requirement for night racing? Were NSW EPA requested to submit a report by the State government? No, they have not. Therefore, the NSW</p>	

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		<p>government has a responsibility and a duty of care to all those who live and work in the catchment area of Royal Randwick Racecourse to request NSW EPA do a report regarding this matter, particularly the use of diesel engines.</p> <p>5. There is already significant congestion and frustration on the roads that surround Royal Randwick Racecourse (particularly Doncaster Ave) and this is independent of existing race meets. There is only one point of entry to the designated taxi drop-off and pick-up zone and the members car park for Royal Randwick Racecourse which is on Doncaster Ave. This is a single-carriage way that is already highly congested during daily peak-hours (again, even outside of race meets) that by adding night races to the equation would further exacerbate an already frustrated condition. Additionally, since the light-rail infrastructure now prohibits right-turns onto Doncaster Ave from Anzac Parade, the intersection of Todman Ave and Doncaster Ave (which filters traffic from Anzac Parade to Alison Road) has drastically worsened over the past 12-months – during peak-hour traffic, it will often take several traffic light changes to pass through this node. This is already an issue without all the new developments that are expected to take form in the near future.</p> <p>6. The bulk of the dwellings that surround Royal Randwick Racecourse are NOT detached houses with private driveways like you would find surrounding Canterbury or Toowoomba racecourses. The dwellings surrounding Royal Randwick Racecourse are mostly apartments and depend largely on the limited street parking. Additionally, these apartments offer minimal architectural devices against noise and light pollution. Therefore, some of the purported ‘mitigation measures’ proposed by the ATC are nothing more than lip service. Residents would inevitably be affected by noise and light pollution. It is also worth mentioning once again that there are significant amounts of health care workers and students who add genuine value to our country; it is unfair to have these people’s lives inconvenienced and their liveability decreased for the sake of the increased profit margins by a few at the ATC.</p> <p>7. When people choose to live and/or purchase a residential property in this part of Kensington and Randwick, they were aware that there was a racecourse that had day-time meets (races) BUT never did they choose to buy dwellings and live there with the knowledge of and the acceptance that they would be subjected to the inconveniences of night time races (i.e. the added noise, lighting, traffic, air pollution, diesel engines, etc).Therefor, it is fair and reasonable to ask whether the ATC would be offering compensation to people on the potential capital loss to all owners who bought a property in the nearby vicinity given that their purchase was made without the knowledge of and expectation that night races would become an occurrence.</p> <p>In conclusion, as a resident of Kensington and someone who is genuinely concerned for the greater good for the many in our community and not for the sole benefit of a few, I object to this proposal for night races at Royal Randwick Racecourse and would hereby request that this matter be escalated to an NSW Upper House Inquiry for further scrutiny and transparency in facts given the significant implication and precedence this would have for Sydney and NSW.</p> <p>It is not in the interest of the public to have the ATC opportunistically financially gain at the expense of the greater good and liveability of residents, students and health care patrons and professionals in the nearby Health and Education precincts. Furthermore, it is irrefutable to say that horse racing is not a public necessity that adds positive value to the community at large. In the simplest terms, it is nothing more than gambling and money extraction off the back of animal exploitation. It is drunk young men urinating on people’s fences. It is drunk woman taking their high heels off just to try get into a taxi. Randwick & Kensington in Sydney is not Meydan, Dubai. Nor should our government be aspiring to this.</p>	
	Submitter 45 – Traffic, Sustainability, Safety and Public disturbance	<p>I object to the proposal by the Australian Turf Club to host night races at Randwick Racecourse for a number of highly valid reasons. Where Randwick Racecourse is located has many important institutions nearby that are highly important to our society. 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. It is absurd to think that out of the 10,000 -15,000 patrons expected to attend night races that the majority would use public transport, this is not even the case during day time races, night time races would have a significant increase in people wanting to drive or at least get home using one of the many ride-sharing apps available.</p>	Refer to Section 4

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		<p>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.</p> <p>There are a significant amount of students (literally thousands) who live nearby to the racecourse, it would be unfair to them, a complete disservice, given many pay vast sums of money for their education, for them to have to tolerate a race night either the night before or a few nights of a major exam or assignment submittal.</p> <p>I would ask the politicians and whoever else will be assessing this proposal to genuinely and honestly to answer to themselves if they would be content and satisfied to live somewhere that one day did NOT have to be concerned with enduring 16 nights of a significant increase in noise, traffic, light, passer-by, increase in pollution, drunk people either vomiting and urinated outside their property or somewhere on their street to the next day simply having to accept that it is something to tolerate so that a few already-wealthy people, can make more money of simple minded people. I think it is fair to say the answer is that you would not be content and satisfied.</p>	