

# Australian Turf Club®

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ROYAL  
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WARWICK  
FARM

## CBD & South Eastern Light Rail Project

### Royal Randwick Racecourse submission to Preferred Infrastructure Report

Submitted to Planning and Infrastructure NSW

April 2014

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## 1. Executive Summary

This supplementary submission is submitted by the Australian Turf Club (ATC) in response to the Preferred Infrastructure Report (PIR) prepared for the CBD and South East Light Rail Project (CSELR project) (SSI 6042) lodged by Transport for NSW (TfNSW) in March 2014.

This submission should be read in conjunction with the ATC's submission to the Environmental Impact Statement (EIS) to the CSELR Project dated December 2013.

The ATC continues to be a major supporter of the State Government and TfNSW initiative for light rail and the associated benefits and opportunities for the community, business and key stakeholders including the Royal Randwick Racecourse (RRR).

RRR is a state significant site and the lifeblood of the NSW racing industry as both a pre-eminent event and training facility. It is also host to some of NSW's largest events with a view to expand in this space. In addition, both the ATC and NSW State Government have plans for nationally significant development on the site.

The ATC is committed to the revitalisation of RRR and has invested \$204 million to date including over \$35 million on construction of the busway, taxi rank and day stalls and more recently \$169 million on the grandstand redevelopment. The ATC has further plans for a new \$75 million equine stabling facility (approved) and a \$110 million hotel development (approval pending).

The ATC worked closely with Randwick City Council and its neighbours on its Masterplan for the racecourse. The masterplan represents a multibillion-dollar investment to ensure ongoing operations of RRR, the Thoroughbred Racing Industry and the Randwick Specialised Centre to stimulate economic growth and well-being for NSW.

The ATC continues to work in collaboration with TfNSW and other key stakeholders on the development of the Project, in relation to the potential impacts on the RRR and surrounding locality to ensure its ongoing operation and contribution to the industry and broader community.

The ATC's submission to the EIS outlined areas of concern with the project, making over 100 recommendations to address and mitigate the potential environmental impacts on the RRR and its surrounds.

The ATC has reviewed the Submissions Report and PIR in relation to impacts on the RRR, its operations and surrounds. Although some issues outlined in the ATC's original submission have been addressed in the PIR, many issues remain unresolved to date.

There is no current agreement between TfNSW and the ATC relating to outstanding matters for the RRR.

Therefore, to defer the resolution of a number of key issues as (recommended in the PIR) does not provide any certainty for the ATC that these issues can be satisfactorily resolved. It is considered appropriate to ensure that these matters are addressed through conditions of approval.

This submission outlines 5 outstanding areas of concern which should be resolved through the planning process, either by amended plans or future conditions of approval as detailed in Table 1 below.

Key areas of concern	Required Outcomes for RRR
1. Continuous Operating Environment	Maintain RRR operating capacity that was in place prior to the CSLER project including acceptable access to the RRR to enable the continuation of its wide range of operations and non-raceday events
2. Spectator Precinct	Resolve impacts from the Light Rail Vehicles (LRV) stabling facility on the Spectator Precinct, replacement of existing facilities and ensuring satisfactory access to RRR during construction and operation
3. Alison Road frontage	Ensure high quality interface between the Light Rail and the RRR to allow for heavy vehicle access, reduce impacts on equine activities and ensure landscaping and high level of visual amenity
4. Wansey Road	Ensure access to the RRR is maintained and all equine related issues are addressed during construction and operation
5. Light Rail Stops	Ensure appropriate location and design of the proposed light rail stops adjoining the RRR during construction and operation

Table 1: Key areas of concern to the PIR

The above issues are complex and relate to both the operation of the RRR as well the evolving nature of the site in accordance with the adopted Masterplan and other State Government approvals.

This submission provides further details on the specific outstanding issues relating to the Project and its impact on the RRR and makes a number of recommendations, which are requested to be included as conditions in any future approval for the CSLER Project.

## 2. Response to the Submissions Report

The RRR is an 82ha site nominated as a State Significant Development Site in the *State Environmental Planning Policy (State and Regional Development) 2011*. The RRR site uses are complex and function as areas for public entertainment, equine training facilities, major public events and raceday carnivals.

The RRR and Randwick City Council have worked in collaboration on a Masterplan that identifies the site into a number of precincts. Maintaining a continuous operating environment across **all** precincts is critical to ensure the RRR's successful operation as one of the world's premier racecourses, training facility and host to major non-raceday events.

It is paramount that the RRR maintain its service capacity and operations that are in place **prior** to the CSLER project both during construction and operation of the light rail.

It is recommended that Planning and Infrastructure NSW (P&I) ensure that appropriate conditions are placed in any Infrastructure Approval to mitigate the environmental impact of the Project on the RRR to augment the existing Environmental Management Measures proposed in the PIR. A detailed response to the Submissions Report is detailed at Appendix 1. The outstanding issues of environmental impact are summarised in Table 2 under the 5 key areas of concern.

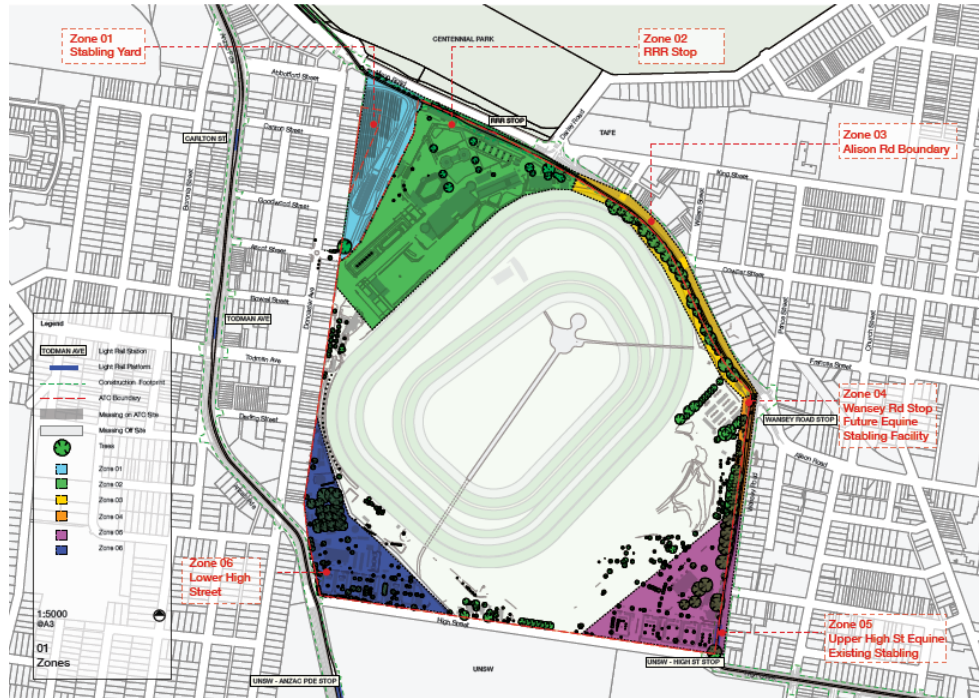


Figure 1: Precinct Map for RRR indicating key areas of impact identified in the original ATC submission

Key area of concern	Outstanding issues
1. Maintain a Continuous Operating Environment	<ul style="list-style-type: none"> <li>maintaining service capacity and functions in place prior to the CSELR Project</li> <li>landscaping and environmental impacts, particularly along the RRR boundaries</li> <li>ensuring workable access during and post construction (vehicular and pedestrian)</li> <li>impact on equine stabling and daily equine activities</li> <li>impact on raceday and non-raceday events</li> <li>visual amenity issues</li> <li>impacts on future state significant and other major development on the site</li> <li>heritage / Interpretation measures</li> <li>stormwater / flooding issues on LRV Stabling Yard &amp; RRR boundaries</li> <li>air quality, electromagnetic field radiation &amp; vibration during and post construction</li> <li>impacts on existing buildings and equine activities during and post construction</li> <li>Replacement buildings and infrastructure and associated consent responsibilities</li> </ul>
2. Spectator Precinct and LRV Stabling Facility	<ul style="list-style-type: none"> <li>design and location of the LRV Stabling Facility</li> <li>replacement of existing service facilities and associated infrastructure for the RRR in this location</li> <li>Replacement carpark and related access to Alison Road and Doncaster Ave</li> <li>Impact on required services &amp; utilities</li> <li>Spectator Precinct / Main entrance, access gates</li> <li>SWAB building</li> <li>Intersection works / gates</li> <li>Intersection works – interaction with Hotel application</li> <li>Administration Building</li> <li>Pedestrian impacts / Alison Road frontage</li> <li>Replacement of landscaping, fencing and security buildings</li> </ul>
3. Wansey Road Impacts	<ul style="list-style-type: none"> <li>Wansey Road Precinct / access</li> <li>Construction, noise impacts on equine activities</li> <li>Access gates</li> <li>Consistency with Urban Activation Precinct</li> <li>Impact on approved stables</li> </ul>
4. Light Rail Stops	<ul style="list-style-type: none"> <li>Design issues</li> <li>Traffic / bus / pedestrian designs</li> <li>SWAB building</li> <li>Replacement bus zone</li> <li>Event operations</li> <li>Replacement carparking</li> <li>Impacts on access and retaining walls</li> <li>Landscaping</li> <li>Removal and replacement of buildings and infrastructure</li> <li>Event Management Plans</li> </ul>
5. Alison Road frontage	<ul style="list-style-type: none"> <li>Alison Road frontage event operation</li> <li>Intersections and gate access</li> <li>Pedestrian movements</li> <li>Urban design outcomes, gate fencing, landscaping, furniture, upgrade to admin building etc</li> <li>Impact on equine training activities</li> </ul>

Table 2: Outstanding issues relating to RRR

### 3. Response to Preferred Infrastructure Report

#### 3.1 Overview

The ATC has reviewed the Submissions Report and the Preferred Infrastructure Report (PIR). The PIR makes 13 key design changes with the following amendments directly affecting the Royal Randwick Racecourse (RRR):

- *Design Change 8 – Local access arrangements to Royal Randwick Racecourse*
- *Design Change 9 – CSELR alignment and stops along Alison Road and Wansey Road.*

The ATC supports the collaboration between the ATC, TfNSW, Randwick City Council, UNSW and other stakeholders to address key environmental impacts from the CSLER Project.

This consultative approach has resulted in a number of proposed design solutions to address potential impacts on the RRR, specifically relating to:

- Access issues to the RRR
- Movement of pedestrians and buses on and off the RRR site
- Design issues relating to Light Rail Stops
- Alison and Wansey Road frontages
- LRV Stabling Facility and associated issues
- Equine activities and Wansey Road issues

However, it is considered that the Submissions Report and the PIR does not adequately document these proposed solutions or address all of the issues raised in the ATC's original submission.

The ATC consider that many of the issues raised in its original submission remain outstanding and have not been satisfactorily addressed in the PIR. In addition, the amendments to the PIR have not addressed the environmental impacts on the RRR.

The proponent's response to many issues raised in the ATC's submission to the EIS is to resolve outstanding matters through:

- Negotiations between TfNSW and the ATC as part of the acquisition of land as part of the CSELR project agreement, and/or
- Future detailed design development, post approval.

The ATC will continue to work in collaboration with TfNSW and other key stakeholders on these critical issues to ensure all environmental impacts are mitigated and the RRR maintains its continuous operating environment as it was prior to the CSLER project.

However, this approach is not considered to adequately address the outstanding issues or to appropriately mitigate adverse environmental impacts on the RRR resulting from the Project, particularly in the event a developer agreement is not executed.

There is no current agreement between TfNSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues (as recommended in the PIR) does not provide sufficient certainty for the ATC that these issues can be satisfactorily resolved prior to implementation of any future approval for the project.

It is considered appropriate to ensure that these matters are addressed through conditions of Approval to augment the existing Environmental Management Measures proposed in the PIR (Table 8.1 of the Submission Report, incorporating PIR).

Further consideration of the PIR in relation to the potential environmental impacts on the RRR is detailed below.

The PIR outlines a number of design changes to the Project which seek to minimise the environmental impacts or to deal with issues raised during the exhibition. Design Changes 8 and 9 are considered relevant to the RRR and its operations. A response to these amendments is detailed below.

## **3.2 Design Change 8 – Local access arrangements to Royal Randwick Racecourse**

The EIS did not provide sufficient eastbound access to the RRR for event buses and coaches for both raceday and non-raceday events.

The PIR proposes an amended design solution that enables buses to enter into a loop road from Alison Road eastbound along King Street, John Street and westbound down Alison Road, then crossing the proposed Light Rail line to access the RRR. This design solution removes the existing situation where buses use the Darley Road roundabout to perform a U-turn manoeuvre to Alison Road to access the RRR site.

The PIR does not provide sufficient detail on proposed bus layovers or areas for set down/pick up and how these areas relate to the light rail operations, pedestrian movements and access into the RRR. An extract of the PIR detailing the proposed design changes is provided at Figure 2 below.

Notwithstanding the benefits of a light rail transit system, the ability for buses and private coaches to access the RRR remains a critical component to ensure the continuous operation of the RRR for raceday and non-raceday events. This bus and coach access is also required in the event of disruptions to the light rail operations during a major event at the RRR.



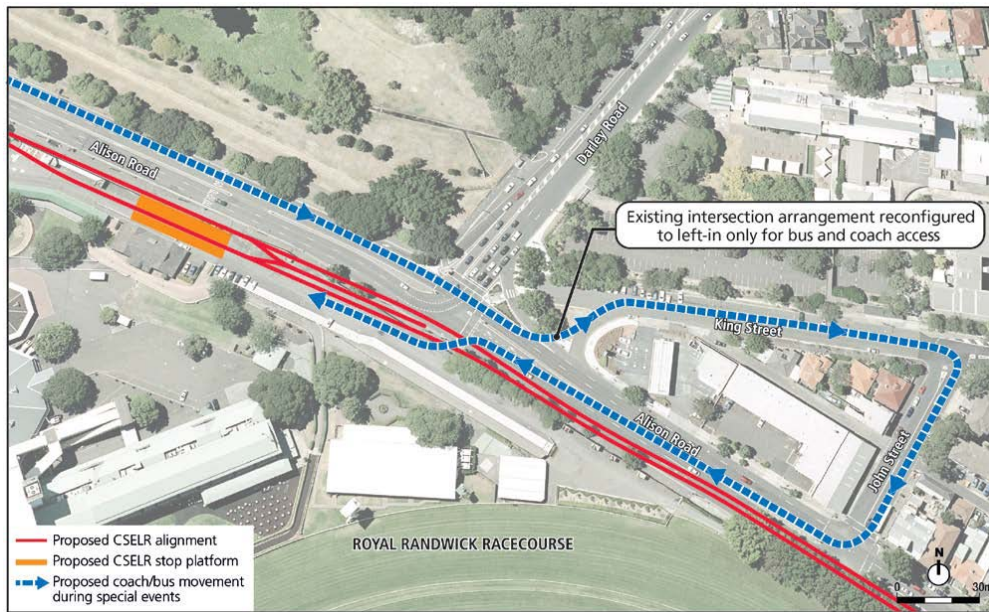


Figure 2: Revised local access arrangements to RRR (Source: PIR)

The ATC has undertaken a detailed investigation of the above design change and raises the following issues:

- *Exhibited proposal* - TfNSW acknowledge this proposal was unsafe for pedestrians
- *Busway* – the proposal does not provide sufficient detail for an appropriate area for set down / pick up of patrons to the RRR. Any bus area will need to ensure pedestrian safety at all times as well as resolve potential bus conflict with:
  - light rail operations
  - existing traffic along Alison Road
  - traffic entering and leaving the RRR.
  - Pedestrians
  - The event stop
- *Impact on Spectator Precinct* - The buses appear to enter the Spectator Precinct which is likely to result in conflict with the high level of pedestrian movements during both raceday and non-raceday events in this area (this was also the case with the exhibited design).
- *Crossing light rail* – there is insufficient detail provided to demonstrate that buses can cross the light rail in a safe and coordinated manner. This has the potential to create confusion and potential conflict to both light rail and bus operations.
- *Pedestrian safety* – Does not appear to provide appropriate or best practice crowd management or acknowledge maximum crowd numbers and acceptable operations for bus numbers or mode min. In addition, it does not identify mode mix during peak operations or operational management plan.

### ***ATC's proposed busway linking the revised access arrangements in the PIR***

The revised local access arrangement has merit by providing an alternate access arrangement for eastbound buses to access the RRR. Following consultation with TfNSW, the ATC proposes an alternative solution to address the loss of the existing busway (resulting from the RRR event stop) in conjunction with the proposed local access arrangements for buses as detailed in the PIR. Further details are provided in Appendix 3 and a recommended Condition of approval (A.32)

The ATC's alternative solution is part of an integrated design response including access for the LRV Stabling Facility and the Main Gate 1 as summarised below:

- Utilises existing signalised intersection at Darley Road and Alison Roads for buses to turn into the RRR
- Enables buses to cross the light rail at a controlled intersection
- Provides a well resolved bus set down/pick up area that addresses pedestrian, traffic, bus and light rail conflicts
- Designed in conjunction with an alternate light rail access to the LRV Stabling Facility and revised Gate 1 entrance to the RRR

The ATC's alternative solution responds to the 3 key issues identified by the ATC with the PIR design as follows (Figures 3-4):

- The design provides a new busway located in conjunction with Gate 1 and entrance to the LRV Stabling Facility. Eastbound buses can travel in the revised local access arrangements as proposed in the PIR and continue westbound into the new busway
- The new busway reduces potential impacts between buses, light rail and pedestrians by providing a dedicated pedestrian zone for bus setdown and pick up
- The new busway will ensure appropriate interaction with the light rail in conjunction with the main entrance to the RRR

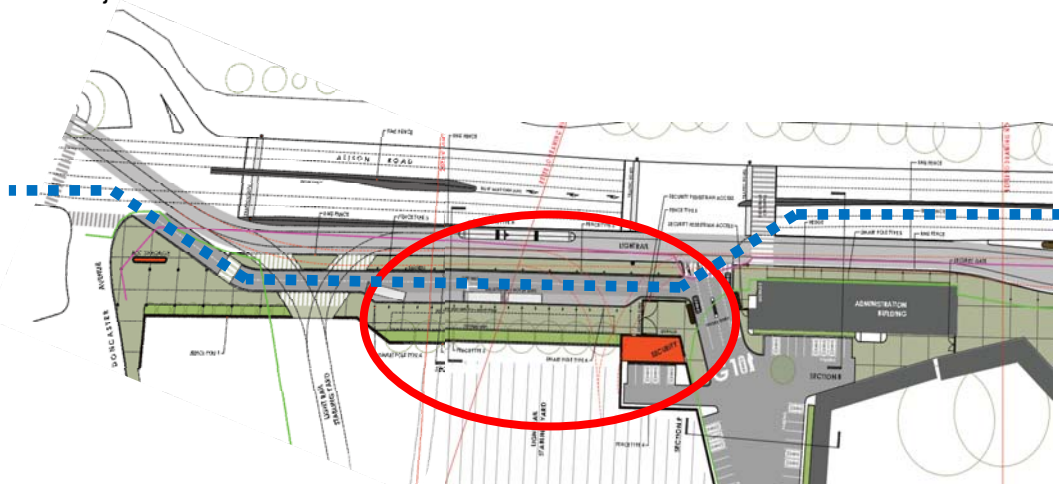


Figure 3 – ATC alternative design solution for Gate 1 access and new bus layover area (outlined in **RED**) with buses travelling from PIR revised local access arrangements (outlined in **BLUE**) (Source ATC)

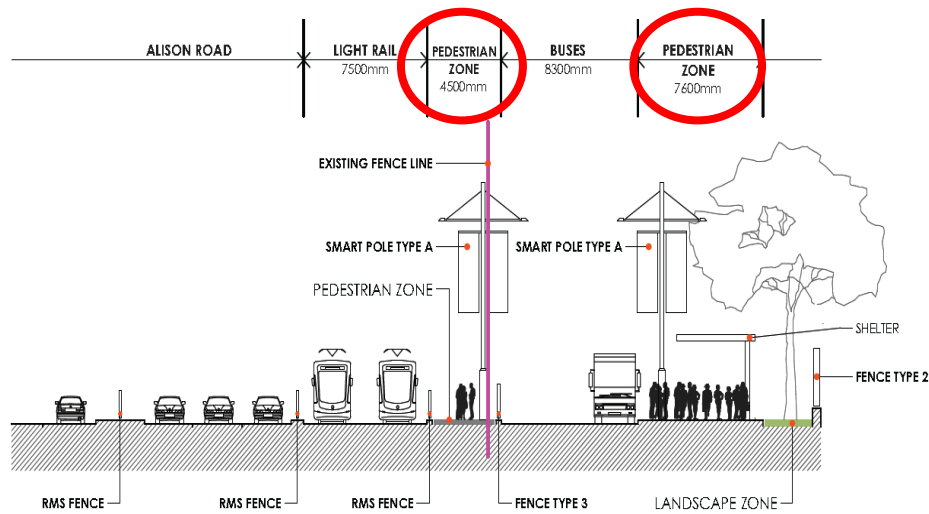


Figure 4 – ATC alternative design solution for a new bus layover area opposite Gate 1 with revised pedestrian zones highlighted in **RED** (Source: ATC)

### 3.3 Design Change 9 – CSELR alignment and stops along Alison Road and Wansey Road

The EIS proposed a side running light rail alignment along the southern side of Alison Road and the western side of Wansey Road, which continued as a centre running alignment into High Street. The proposal resulted in the loss of all on-street parking along Wansey Road, with 2 light rail stops along the southern and northern ends of Wansey Road.

The PIR proposes the following key 3 amendments:

- Amendment to the alignment of the light rail along Alison Road
- Amendments to the traffic configuration of Wansey Road
- Re-location of both Wansey Road Light Rail Stops into Alison Road and High Street respectively.

In principle, the ATC does not raise objection to the above amendments subject to the following:

- Gate 8 access be replaced by a new Gate 7A allowing heavy vehicle access from Cowper Street
- The ATC is provided with appropriate compensation for the loss of any structures on the RRR site including the existing residence located near the corner of Alison Road Wansey Roads. This is to include beautification of the area, including major planting to ensure a high quality appearance from the spectator precinct.
- Appropriate treatment of any retaining walls along the RRR boundary



- All RRR boundaries/frontages must address visual impacts and ensure appropriate landscaping, fencing, lighting in future consultation with the ATC and Randwick City Council
- The proponent must address any impact on the approved equine stables design prior to construction.

### ***Heavy vehicle access and Cowper Street access***

The ATC has previously raised the issue of maintaining heavy vehicle access to the RRR. The proposed light rail alignment along Alison Road is located in close proximity to the racetrack and results in an unacceptable impact on:

- The ability for heavy vehicles to access this part of the RRR; and
- Equine activities, including racedays

It is noted that the PIR amendments will result in additional impacts on the RRR including the removal of the existing dwelling and impacts to existing and proposed access for heavy and light vehicles access to service track for maintenance and the balance of the site and infield (Figures 5-7). The revised design results in the track being reduced from 3.5m to 1.4m.

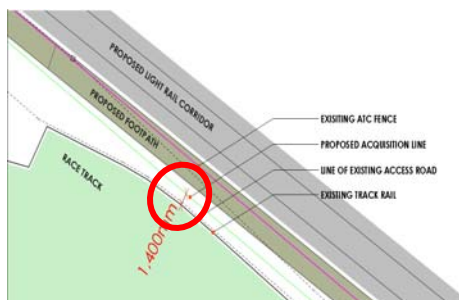


Figure 5 – EIS proposed setbacks from light rail to racetrack along Alison Road and track minimised to 1.4m (Source: ATC)

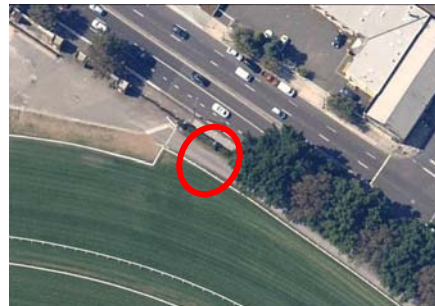


Figure 6 – Existing access used for Heavy Vehicle access to racetrack (outlined in RED) (Source: ATC)



Figure 7 – Existing 3.5m access for heavy vehicles outlined in RED (Source ATC)

Heavy vehicle access to the RRR is required daily and is critical to maintain the continuous operating environment for all equine activities and non-raceday events. The proposed Gate 7A accommodates the new Wansey Road light rail stop and provides more efficient access for heavy vehicles to the RRR.

It is considered that this new access at Gate 7A will also reduce impacts on light rail operations through a revised controlled intersection at Cowper Street and Alison Road to allow for heavy vehicle access (Figure 8). The new access will require a re-phasing of the existing intersection to give priority for light rail and ability to allow heavy vehicles to enter and exit the site in a coordinated manner.

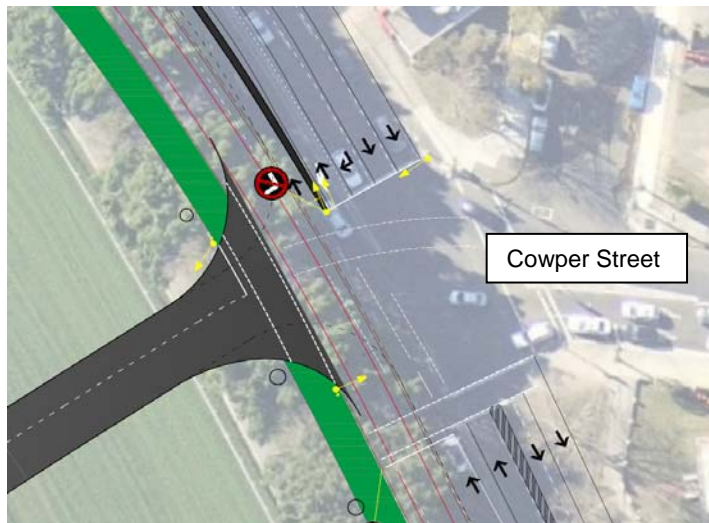


Figure 8 – ATC alternative design solution for a new Cowper Street / Alison Road Intersection for heavy vehicle access for Gate 7A (Source: ATC)

### ***Wansey Road light rail alignment and access to RRR***

The proposed light rail alignment in certain locations along Wansey Road results in a change of level between Wansey Road and the light rail alignment (Figure 9).

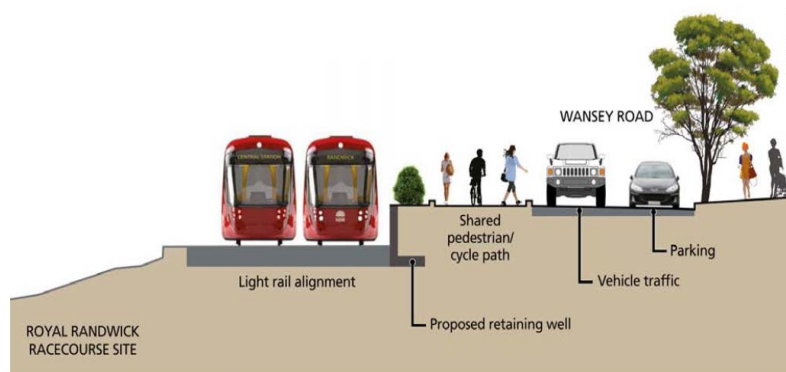


Figure 9 – PIR proposed light rail alignment along Wansey Road indicating change of levels impacting on access from Wansey Road to RRR (Source: PIR)

This proposed alignment may impact on both existing and proposed access to RRR along Wansey Road in the following locations:

- Gate 10 – this gate is proposed to be re-located as part of the Major Project Approval for the Stables Precinct, including regrading internal road to ensure heavy vehicles can enter and exit as per the current arrangement (Figure 10)
- Gate 12 – this gate acts as the primary access to the existing stables facility and may also facilitate any future Urban Activation Precinct
- Proposed new gate/light rail crossing at Wansey Road opposite Arthur Street to facilitate any future Urban Activation Precinct

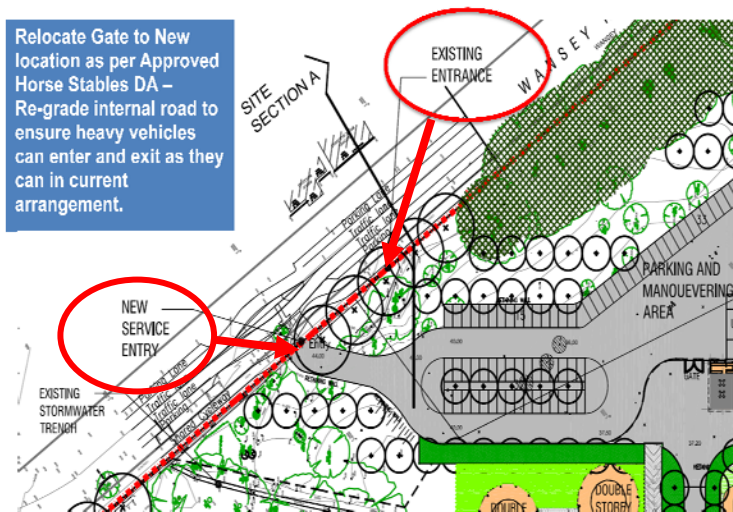


Figure 10 – ATC approved relocation of Gate 10 south along Wansey Road as part of Stables Precinct Approval indicated in **RED** (Source: ATC)

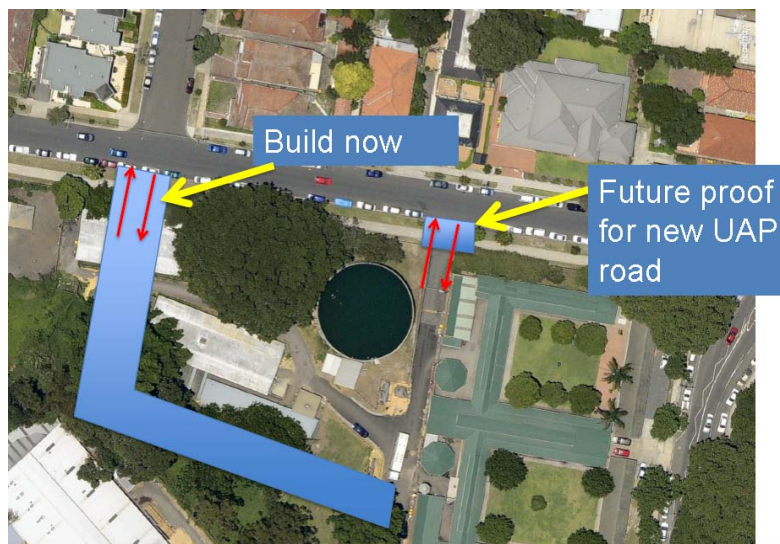


Figure 11 – ATC Gate 12 and potential future proofing of access for any Urban Activation Precinct (Source: ATC)

The ATC recommends that the alignment at Wansey Road be re-graded and amended to maintain adequate access to the RRR along Wansey Road, including a future access at Arthur Street to facilitate the Urban Activation Precinct.

## 4. Proposed conditions of approval

The ATC has prepared a number of proposed conditions of Approval based on the following 5 key areas of concern identified in this submission:

- maintain the RRR's continuous operating environment and operations that were in place **prior** to the CSLER project both during construction and operation of the light rail.
- ensure impacts to the Spectator Precinct are appropriately mitigated through a number of management plans, additional information and alternative design solutions to the proposed LRV Stabling Facility
- ensure that any impacts to the Wansey Road Precinct, in particular on equine activities are mitigated and that access to the RRR is maintained
- location and design issues relating to the 3 Light Rail Stops adjoining the RRR, in particular the RRR Stop and its interface with the RRR entry and access.
- ensure that the Alison Road interface with the RRR is treated appropriately to maintain the required access to the RRR for both raceday and non-raceday events

The proposed conditions have also been inserted into proposed Environmental Management Measures as recommended in the Submissions Report and PIR (Appendix 2).

## 5. Conclusion

In summary, the ATC considers that the PIR has not adequately addressed the potential environmental impacts raised in the ATC's original submission to the Project.

It is requested that the P&I consider all issues raised in ATC's submissions and adopt the recommended conditions of approval as outlined in this submission.

The ATC looks forward to continuing to work in collaboration with the NSW Government, Randwick City Council and other key stakeholders to address these issues to ensure the continual operating environment of the RRR and the successful operation of the CSLER Project.