Royal Randwick Racecourse submission to Preferred Infrastructure Report Appendix 1

The following is the ATC's response and commentary to the Submissions Report. For clarity, ATC's proposed conditions of approval have been inserted into the proponent's revised environmental management measures for the CSLER Proposal (Table 8.1) contained in the Preferred Infrastructure Report (PIR).

Extract from Table C.4 - Australian Turf Club (ATC)

Item	Summary of issue	Response	ATC Comment
1.0 Executi	ve summary		
1.1	Notes that ATC is concerned about a number of issues that haven't been resolved, and submits that the following outstanding issues should be resolved prior to the tender phase.	The resolution of many of the issues raised by ATC would be achieved either through negotiations between Transport for NSW and ATC as part of the acquisition of land as part of the CSELR project agreement, or through the detailed design development. An Urban Domain Reference Group would be established to advise on design aspects of the proposal. ATC would be offered an opportunity for continued involvement in the design development through the Urban Domain Reference Group. Detailed design is part of the construction tender.	The ATC does not agree with this response. The ATC will continue to work in collaboration with Transport for NSW and other key stakeholders on all outstanding issues raised in its submission to ensure all environmental impacts are mitigated and the RRR maintains its continuous operating environment. 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. There is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR

1.2	Key areas requiring furthering design and consideration:		
1.2.1	Confirmation of the final route (noting changes from proposal in the EIS may have major impacts on the Royal Randwick racecourse (RRR) site.	Proposed changes to the CSELR route from the design described in the EIS relevant to Royal Randwick racecourse are presented in sections 6.10 and 6.11 of this report. These include proposed changes to local access arrangements for Royal Randwick racecourse and alignment and stops along Alison Road and Wansey Road.	Noted
1.2.2	Consideration of the sensitive and frequent nature of daily equine movements.	Further consultation with ATC during detailed design would be undertaken as a directly affected landowner (consistent with mitigation measure F.2 in Chapter 8 of this report) to address the matters raised in relation to horses. Measures would be agreed to address safety and welfare concerns and to minimise potential impacts on horses during construction and operation. Measure S.3 also requires communications with ATC to clearly explain the timing, duration and likely noise levels for the construction works near the horse stables.	The ATC does not agree with this response. There is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR. The ATC recommends that the proponent prepare an Equine Management Plan (condition A.25) in relation to equine activities. This includes appropriate noise levels and mitigation measures to ensure the safety of the horses and to address the impacts on the RRR and its operations.
1.2.3	Safety concerns relating to the potential spooking of horses during training and racing, during construction and operation of CSELR.	Please refer to response for issue 1.2.2.	See comment to 1.2.2.

1.2.4	Design and location of proposed Randwick stabling facility, and potential impacts including loss of buildings, access, visual and amenity issues.	 The design of the Randwick stabling facility is described in section 5.2.10, Volume 1A of the EIS. Potential impacts are described in Chapter 15 in Volume 1B. An Urban Domain Reference Group would be established to advise on design aspects of the proposal. ATC would be offered an opportunity for continued involvement in the design development through the Urban Domain Reference Group. This would provide an opportunity for Transport for NSW to continue to work with ATC to consider the issues raised through the detailed design phase of the proposal. Transport for NSW would continue to work with ATC to identify the loss of buildings for the stabling facility and to establish an arrangement for appropriate replacement of the displaced amenity. 	The ATC does not agree with this response. The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR. The ATC recommends a number of conditions relating to the LRV Stabling Facility to ensure existing buildings and car spaces are re-instated by the proponent to ensure the continuing operation of the RRR.
1.2.5	Loss of access (or significantly restricted access functionality) to RRR vehicle and pedestrian gates, during construction and operation. Notes the proposal necessitates deletion of the recently completed busway; resolution of replacement design and integration with light rail stop and pedestrian thoroughfares is unresolved.	 Proposed changes to local access arrangements for Royal Randwick racecourse (relative to those described in the EIS) are detailed in section 6.10 of this report. These changes seek to address the concerns raised by ATC. Transport for NSW would continue to work with ATC to address access issues raised through the detailed design phase of the proposal, with a view to minimising impacts on vehicular and pedestrian access to the Royal Randwick racecourse having regard to ATC's operational requirements. These matters would also be addressed through the traffic, transport and access management strategies and traffic management plans for the construction of the CSELR. 	The ATC does not agree with this response. There is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR. The ATC recommends a number of conditions relating to the LRV Stabling Facility to ensure a continuous operating environment is maintained at the RRR.

1.2.6	Suitability and adequacy of current RRR stop location and layout, in terms of safety and functionality to best support RRR activities/events'	The location and layout proposed in the EIS responded to the need to balance the footprint of the Royal Randwick Racecourse stop, its functionality and impacts on heritage. Amendments related to local access arrangement to the Royal Randwick racecourse are presented in section 6.10 of this report to address issues raised by the ATC. Safe operation of the racecourse during normal business hours and in event modes during construction and on completion would remain the responsibility of ATC. Transport for NSW would continue to work with ATC through the detailed design phase of the proposal to address issues raised in relation to the operation of the Royal Randwick racecourse stop. Transport for NSW would continue to work with ATC to address the issues associated with ensuring business continuity during construction within and around the racecourse.	The ATC does not agree with this response. There is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR The ATC recommends a number of conditions relating to the RRR Stop to ensure a continuous operating environment is maintained. The ATC has provided a number of sketch plans demonstrating an alternative solution to the design of the RRR Stop that maintains access to the RRR, reduces conflict between buses and the Project and increases pedestrian safety.
1.2.7	Proposed relocation strategy or design of functioning buildings, infrastructure, services, structures and car parks, and how these might be replaced'	Transport for NSW would work with ATC to develop a strategy for the appropriate replacement of the displaced buildings and other infrastructure directly affected by the CSELR. Those facilities that are operationally necessary for the racecourse would be directly replaced by Transport for NSW as part of this strategy.	The ATC does not agree with this response. There is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR The ATC recommends a number of conditions relating to the replacement of existing facilities to ensure a continuous operating environment is maintained.

1.2.8	Proposed relocation/replacement strategy or design of functioning buildings, infrastructure, services, structures and car parks'.	Refer to response to issue 1.2.7.	See comment to 1.2.7.
1.2.9	Impact on approved and proposed developments including equine stabling facility, hotel, standing event consent and P&I draft Urban Activation Precinct.	Transport for NSW has considered these issues during design development for the CSELR, and potential impacts on land use and property are described in sections 15.4.1, 15.4.2 and 15.4.3 of the EIS (Volume 1B). One of the identified impacts includes acquisition of some of the Royal Randwick racecourse land. Transport for NSW has been, and would continue to consult with ATC. As outlined in section 6.11 of this report, the proposed design changes to the alignment of the CSELR along Alison Road, Wansey Road and the relocation of the Wansey Road and UNSW High Street stops would not result in any changes to impacts on future land use beyond those identified in the EIS. Further consultation with ATC in relation to these approved or proposed developments would be undertaken during the land acquisition and detailed design stages of the proposal.	The ATC does not agree with this response. There is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR The ATC recommends a number of conditions relating to the Wansey Road alignment, the proposed developments within the RRR and the UAP.
		The ATC's proposed hotel is yet to receive planning approval. Transport for NSW has considered the traffic management issues associated with access to the proposed hotel across the CSELR alignment in the vicinity of the Royal Randwick racecourse stop and has advised both P&I and ATC of the operational requirements. Transport for NSW would continue to work with ATC in its development of traffic management strategies for the proposed hotel. The Randwick Urban Activation Precinct (UAP) has not yet been formally consulted and is therefore subject to change. P&I would need to consider the interaction of the CSELR with the draft UAP and approved developments on Royal Randwick racecourse land as part of its determination of the proposal.	The proposed Wansey Road design changes are not supported by the ATC. The Shared path should be positioned adjacent to the RRR boundary and the LRVs positioned adjacent to the traffic. This alternative solution ensures retention of additional trees, reduced pedestrian crossing of the light rail corridor and increased pedestrian safety. The proposed design has been documented by the RCC and is included in the RCC Urban Design Guidelines Volume 1. The ATC recommends that the Proponent further consider the proposed UAP in consultation with P&I in particular to maintaining access to the RRR.

1.2.10	Noise and vibration on sensitive locations within RRR, including administration/commercial buildings, equine stables, residential accommodation and race tracks.	These matters are addressed in section 15.5, Volume 1B of the EIS and Technical Paper 11 (Volume 6). Noise and vibration impacts on administration/ commercial buildings and stables have been considered. The EIS does not specifically address the residential accommodation within the stables, the existing residence on the corner of Wansey Road and Alison Rd, or the proposed and approved stables at this location. The presence of these additional land uses and receivers is noted. Operational noise impacts at these locations are shown in the noise contours in Appendix D of Technical Paper 11. Construction and operational impacts on all receivers would be reviewed in the detailed design stage.	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. The ATC recommends a number of conditions relating to noise and vibration. The EIS documentation does not consider the current alignment of the light rail with its close proximity of approximately 1m from the existing ATC Administration building. The ATC is concerned of the short and long term impacts which may occur.
1.2.11	Acoustic analysis of the impact of loss of trees surrounding RRR and the potential impact on surrounding residents during events.	The trees provide a visual rather than an acoustic barrier to surrounding residents. There would be no noticeable change in noise level impacts during events compared to that experienced during normal operations of the CSELR. Subsequent to the impacts assessed in the EIS, the alignment along Alison Road is proposed to shift less than five metres (refer section 6.11 of this report for details of this change and the potential impacts of this change). This is not anticipated to result in a noticeable change to the EIS construction noise and vibration impacts, as the overall construction footprint assessed is generally similar to that assessed as part of the EIS. The worst-case prediction of highly intrusive impacts at the receivers on Alison Road, adjacent to this location (during mainline construction works), is consistent with that presented in the EIS. In terms of operational impacts, the proposed movement of the alignment by up to five metres closer to the sensitive receivers on Alison Road may result in an apparent increase of around one to two dB in the operational noise predictions at the most affected locations, assuming no changes in speed or LRV numbers.	See comment to 1.2.10.

1.2.12	Urban design details and fabric including design and materiality of LR stops, paving material, tree replacement and public domain finished and fixtures.	An Urban Domain Reference Group would be established to advise on design aspects of the proposal. ATC would be offered an opportunity for continued involvement in the design development through the Urban Domain Reference Group. This would provide an opportunity to consider the issues raised through the detailed design phase of the proposal. Urban design details and fabric would be determined in consultation with ATC during detailed design.	The ATC does not agree with this response. There is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR The ATC recommends a number of conditions relating to the landscape plan and urban design is included in the Approval.
1.2.13	Impacts to visual amenity adjacent to the racecourse on Alison Road through the loss of trees, removal of fencing, design/material for Wansey Road retaining wall structure and construction of the stabling facility.	These issues are addressed in sections 15.6 and 15.7, Volume 1B of the EIS and Technical Paper 10 (Volume 5). It is acknowledged that there would be a number of visual impacts arising from the CSELR proposal. Since publication of the EIS, Transport for NSW has refined the design of the alignment along Alison Road east of Darley Road. These proposed design changes are detailed in section 6.11 of this report and would result in the retention of an additional 15 to 20 trees. Transport for NSW would continue to refine the design along Alison Road to take account of detailed site investigations of root zones. The CSELR stops have been re-located out of Wansey Road into Alison Road and High Street. Together these changes would reduce the overall visual impact from the CSELR proposal as discussed in section 6.11.	Noted. Should the trees be removed, replacement should occur in consultation with the ATC as required via Condition C.14. Appropriate boundary fencing and or screening should also be considered in this plan in conjunction with any future guidelines from RCC.

1.2.15	Detailed strategy to address any loss of heritage fabric.	Mitigation measures to address potential heritage impacts are listed in section 15.8.4, Volume 1B of the EIS and section 6 of Technical Paper 5 (Volume 4). Detailed measures would be developed during detailed design in consultation with ATC. In reference to the proposed design changes in Chapter 6 of this report (Preferred Infrastructure Report), the proposed relocation of the Wansey Road stop would cause additional adverse heritage impact on Wansey Cottage, compounding the existing major adverse impact of the CSELR on the Royal Randwick Racecourse Heritage Conservation Area assessed in the EIS. The proposed design changes would, however, reduce the risk of impact on significant trees in George Dan Reserve and reduce the impact on trees along Alison Road as a result of the proposed movement of the CSELR alignment in this area (refer section 6.11 of this report). The relocation of the UNSW High Street stop may allow retention of the Southeast Stables group, an item of moderate/little heritage significance in the Royal Randwick Racecourse Heritage conservation Area.	The ATC recommend that any impact on existing heritage items and/or interpretation works be consistent with the Godden Mackey Logan Report and Heritage Strategic Management Plan. Any amendments are to be undertaken in consultation with the ATC (Condition D.18).
1.2.16	Minimal design and performance detail for intersections and carriageways for all roads surrounding the racecourse, including access arrangements to the Spectator Precinct, infield and Wansey Road gates; for both passenger vehicles and heavy vehicles.	Transport for NSW has given further consideration to access to Royal Randwick racecourse and proposed changes to access arrangements since publication of the EIS as detailed in section 6.10 of this report. These issues would be further considered during detailed design consistent with mitigation measure A.8 in Chapter 8 of this report, which requires permanent changes to access arrangements to be minimised, including the maintenance of existing accesses where possible. Access restrictions or changes would be subject to further consultation with affected parties, and in the case of ATC, would consider operational requirements.	The ATC does not agree with this response. Section 6.10 does not address all access concerns raised by the ATC. 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 The ATC recommends a number of conditions relating to the access and egress around RRR to ensure a continuous operating environment is maintained.

1.2.17	No detail on flood impact assessment or mitigation measures.	Detailed flood modelling would be undertaken during the detailed design phase. Transport for NSW would not make worse existing flood conditions arising from construction of the CSELR proposal. ATC would be consulted in relation to flooding issues during detailed design.	The ATC does not agree with this response. The ATC has raised concern on potential flood impacts on the RRR, particularly relating to the proposed location for the LRV Stabling Facility. The ATC recommends a number of conditions of Approval requiring a detailed Flood Report be prepared demonstrating that there are no detrimental flood impacts to any of the ATC's surrounding land resulting from the development. The Flood Report should also include a schedule of feasible and reasonable flood mitigation measures proposed at each directly-affected property in consultation with the property owner. Subject to agreement with the relevant property owner, any damage caused to property or infrastructure as a result of the Project shall be rectified or the property owner compensated, within a reasonable timeframe, with the costs borne by the Proponent.
1.2.18	Impact on utilities services and infrastructure supporting RRR, and the future ability of services to augment RRR.	Transport for NSW has undertaken desktop utility investigations and liaison with utility authorities. Field investigations to locate utilities along the alignment are currently in progress.Further detailed assessment of utilities, including the need to protect or relocate utilities, would be undertaken during detailed design. Utilities augmentation is outside the scope of this proposal.	The ATC requires all services to remain to ensure a continuous operating environment is maintained. See new condition K.5 and K.7

1.2.19	Details on the design, visual, amenity and landscaping interface issues between RRR and the stabling facility and other areas of the course.	These issues are addressed in sections 15.6 and 15.7, Volume 1B of the EIS and Technical Paper 10 (Volume 5). ATC would be offered an opportunity for continued involvement in the design development through the Urban Domain Reference Group. Detailed urban and landscape design would be undertaken as part of the detailed design. This process would include consideration of the interface issues with Royal Randwick racecourse.	The ATC does not agree with this response. There is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR. The ATC recommends a number of conditions to ensure a continuous operating environment is maintained at the RRR
1.2.20	Details on the design, visual, amenity and landscaping interface issues between RRR spectator	Refer to response for 1.2.19 above.	Refer to comment for 1.2.19 above.
1.2.21	Analysis on whether the proposal is designed to cater for the future impacts of the RRR master plan, population growth demands and coordination with Urban Activation Precinct forecasts.	Population growth within the region (including the UAP) and the Royal Randwick Racecourse Master Plan <u>have been</u> considered in the design of the proposal. The Randwick UAP has not yet been formally consulted and is therefore subject to change. P&I would need to consider the interaction of the CSELR with the draft UAP and approved developments on Royal Randwick racecourse land as part of its determination of the proposal.	The ATC recommends that the Proponent further consider the proposed UAP in consultation with P&I in particular to maintaining access to the RRR, including providing ATC access to data and calculations used by TfNSW in its design work.
1.2.22	Analysis on whether the design caters for growth in events proposed for RRR as a function of its application for a Standing Events Consent.	As discussed in section 5.2.2 of the EIS (Volume 1A), the stop would function as a major event stop for horse racing carnivals, conventions and conferences, and other events that the racecourse hosts throughout the year. These events would likely require a shuttle service to be operated between Central Station stop and Royal Randwick racecourse stop with patrons queuing in front of the light rail stop during events. As with the Moore Park stop, safe and easy access would be provided for large numbers of people to and from the light rail platforms for events.	Noted

1.3	Seeking comfort that the issues (see 1.2 above) are adequately addressed either through approval design documentation or Consent Conditions. Concerned that the current level of documentation does not provide this level of comfort.	The EIS presents a conceptual design for the CSELR proposal, referred to as the definition design. As illustrated in Figure 4.2 of the EIS (section 4.2 of the EIS, Volume 1A), consultation with relevant stakeholders, project partners and the community would continue during the detailed design phase. It is anticipated that this ongoing consultation would be undertaken through the establishment of an Urban Domain Reference Group, a Community Reference Group and a Business Reference Group (refer section 2.4 of this report for further details). The resolution of many of the issues raised by ATC would be either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR or through the detailed design development. The detailed design phase of the proposal and the project agreement would further consider the issues raised by ATC. P&I would need to consider what matters are incorporated into any conditions of approval for the proposal.	 The ATC does not agree with this response. The ATC supports a Urban Domain Reference Group, Community Reference Group and a Business Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR
2.0 Racecour	se characteristics and operations		
2.2	RRR precincts, site uses and access Notes that the ATC has been working closely with Randwick City Council on a Master Plan for the site (see Fig. 1 of submission) ; including varied site uses for public entertainment, equine training and facilities, major public events and race day carnivals.	ATC's work with Randwick City Council towards a Master Plan for the site is noted.	Noted

2.2.1	Site uses – non-race day events Submits that reconfiguration of any intersection as a result of the proposal will need to provide for existing access arrangements and potentially supplement existing capacity in the event of capacity loss elsewhere.	Since publication of the EIS, Transport for NSW has further considered access arrangements for Royal Randwick racecourse in consultation with ATC (refer section 6.10 of this report). Following discussions with ATC as part of the exhibition of the EIS, it was identified that eastbound access to the Royal Randwick racecourse from Alison Road for event buses and coaches would be required. To accommodate this requirement, the refined design would provide a slightly reconfigured intersection of the Alison Road and Darley Road intersection to accommodate a new eastbound, bus-only slip lane from Alison Road onto King Street. Buses and coaches accessing the Royal Randwick racecourse would then travel in a loop along King Street and John Street and access the racecourse in a westbound direction from Alison Road. The slip lane would be marked and sign-posted as bus-only to restrict use by general traffic. The proposed changes are detailed in section 6.10 of this report. Bus drop-off and pick-up arrangements would be from Alison Road, to the east of the Royal Randwick racecourse stop. Detailed consideration of access arrangements would be undertaken during detailed design with regard to ATC's operational	The ATC does not agree with this response. This design solution is does not resolve the issues raised by the ATC. Section 6.10 shows buses crossing over the light rail tracks and into a pedestrian zone adjacent to the RRR Stop. The ATC understands that this may be in error yet the permanent solution has not been advised and is a key safety concern for the ATC. Bus drop off and pick up has not been detailed or modeled sufficiently to ensure safety is maintained for the general public and patrons to the RRR. The ATC recommends an alternative bus layover area as detailed in Figure 3 of this submission (proposed new condition A.32).
		undertaken during detailed design, with regard to ATC's operational requirements.	

2.3	RRR operational requirements – recommendations 1. Transport for NSW should prepare design documentation and management plans in consultation with ATC to confirm that Continuous Operating Environment will not be compromised for the duration of construction and during operations.	The resolution of many of the issues raised by ATC would achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development and participation in the Urban Domain Reference Group. Transport for NSW notes that racecourse management plans are the responsibility of ATC and Transport for NSW would seek to coordinate its construction and operations requirements with these plans.	 The ATC does not agree with this response The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR. The ATC is recommending that the proponent prepare the following Plans to address the impacts on the RRR and its operations: Transport Construction Management Plan (proposed condition A.21) Traffic and Transport Management Plan (proposed condition A.23) Equine Management Plan (proposed condition A.26) Acoustic Report and Noise Management Plan (proposed condition B.13) Landscape Plan (proposed condition G.4) Utility Relocation Strategy (proposed condition Vietor)
	Notes equine operational requirements, in regards to training and equine movements around the site. Submissions lists construction requirements (refer to section 2.3).		K.5) Noted.

2.3.1	Regarding equine stabling facilities, it is noted in the EIS that there is need to demolish stabling facilities in the Upper High Street precinct. No discussion is provided on where affected horses and trainers will be relocated during and after construction.	g the equine stabling facilities. Further detail is provided in section	There are a number of outstanding issues associated with the revised Wansey Road/Alison Road stop and alignment of the light rail in this location including: Impact on access for heavy vehicles Impact on Gate 8 access Impact on revised stables access as approved in the Major Project Approval for the Stables Precinct This issue is discussed in the submission and is covered in a number of proposed conditions.
			In particular proposed condition A.38 & A.40 requires the proponent to provide additional information and assessment of impacts from the light rail/proposed stops on Wansey Road and its impact on the approved equine stabling facility.
			Other issues including Transport Management Plans, Equine Management Plans, access, interface with RRR boundaries, approved equine stabling facility (proposed new condition A.21, A.23, A.25, A.28, A.45, B.13)

2.3.2.1	Regarding daily equine activities: Submits that Transport for NSW	The resolution of these issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development and participation in the Urban Domain Reference Group. These matters would be considered during detailed design in consultation with ATC following a review of its current operational plans, and could be incorporated into the management plans recommended as part of the EIS (e.g. the Construction Environmental Management Plan).	The ATC does not agree with this response The ATC supports an Urban Domain Reference Group.
	should prepare a Race Horse Management Plan, in consultation with ATC, setting out construction and management procedures		However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR.
	during construction and operation. The management plan should include clear guidelines of construction and associated exclusion zones, education and		Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient certainty for the ATC that these issues can be satisfactorily resolved.
	induction procedures to ensure the safety of horses at RRR.		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.
			The ATC is recommending that the proponent prepare the following Plans to address the impacts on the RRR and its operations:
			 Transport Construction Management Plan (condition A.21) Traffic and Transport Management Plan (condition A.23) Equine Management Plan (condition A.25) Event Management Plan (condition A.26) Acoustic Report and Noise Management Plan (condition B.13) Landscape Plan (Condition C.14) Flood Report (condition G.4) Utility Relocation Strategy (condition K.5)

2.3.2.1	Regarding daily equine activities: Submits that there is a need to identify a relocation strategy for the horses and trainers affected	Refer to response to item 2.3.1 above.	Any impact on equine activities is a paramount issue. The ATC recommends new condition (A.25) <i>Impact on equine activities at RRR</i>
	by demolished facilities. Recommends the construction of stabling complex to accommodate the relocation requirements, at a location agreed by ATC.		 The proponent shall provide an Equine Management Plan prepared by a suitably qualified professional which sets out the construction and management procedures both during and after construction when dealing with horses. The Equine Management Plan shall: Include clear guidelines of construction and associated exclusion zones and project personnel education and induction processes to mitigate the risk of an event occurring that could result in damage or injury to a horse at the RRR. Address the equine considerations outlined in the ATC submission and any supplementary submission to the project. Identify a relocation strategy for the horses and trainers to be removed. Ensure all intersections and access points impacted by the project are relocated and designed to cater for the existing capacity requirements and sensitive to the specific requirements of equine transport vehicles. Address impacts relating to acoustics, light impacts and vibration and any other potential impact and propose suitable mitigation measures on all equine activities on the RRR site in conjunction with the Acoustic Report and Noise Management Plan required under Condition B.13.
			The final Equine Management Plan is to be submitted to the Director General for approval in consultation with the ATC & Racing NSW prior to commencement of works.

2.3.3	Regarding events and associated activities: Notes errors and/or omissions in the EIS relating to operational access requirements of the RRR. Clarifications include: • RRR operates 365 days per year • access required for staff and deliveries 24 hours per day, seven days a week • all entrances and exits are used daily • heavy vehicle access required at all crossings into RRR • front entrance (gates 2 and 5) to be maintained to event standard presentation, in keeping with a world class racecourse facility • pedestrian flow paths to be designed to best practice standards to ensure • safe access and avoid 'crush' situations • private and public transport access to be maintained during construction and operation. Note: submission no. 397 includes a Traffic and Transport Report, including the relevant Access and Gate Usage Plan.	These issues are noted by Transport for NSW and would be considered during detailed design, in consultation with ATC to ensure disruption to business continuity is minimised. Transport for NSW would be seeking to work with ATC to rationalise its entrance requirements to ensure multiple entry points do not create safety issues at light rail crossings and lead to an overall reduction in light rail performance. The operations of Gates 2 and 5 are affected by the Royal Randwick racecourse stop configuration and would not continue to operate in their current form. Transport for NSW and its contractor would continue to work with ATC during the detail design of the proposal to develop a design suitable for the front entry to the racecourse.	 The approach proposed by the proponent does not provide any certainty that these issues can be resolved and that access to the RRR is maintained in order to ensure its continuous operating environment. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR. The ATC is recommending that the proponent prepare the following Plans to address the impacts on the RRR and its operations: Transport Construction Management Plan (condition A.21) Traffic and Transport Management Plan (condition A.25) Event Management Plan (condition A.26) Acoustic Report and Noise Management Plan (condition B.13) Landscape Plan (Condition C.14) Flood Report (condition G.4) Utility Relocation Strategy (condition K.5)

2.3.3.1	Recommendations 1. Submits that EIS address existing and future event profile of RRR, and provide a detailed Event Management Plan, in consultation with ATC.	The EIS is a finalised document. Management of events during construction and operation would be considered further during detailed design and construction planning by Transport for NSW and the contractor, with regard to ATC's Event Management Plan and operating plans. In addition, management during construction would be incorporated into the CEMP to be prepared by the Transport for NSW's contractor.	The ATC does not agree with this response. See comment to 2.3
2.3.3.2	2. Submits that Transport for NSW provide a detailed Traffic and Transport Management Plan (TMP) for construction and operation (this TMP will supersede the existing ATC TMP upon completion of the proposal).	A traffic management plan for construction would be prepared by the contractor in accordance with mitigation measure Q.2 in Chapter 8 of this report. Traffic and transport management would form part of the construction and operating procedures to be developed by the contractor. Transport for NSW would review ATC operating plans and work with ATC to minimise impacts on these during construction and operation phases of the light rail. ATC would remain responsible for preparation and implementation of traffic management plans in support of its daily operations and events.	The ATC does not agree with this response. See comment to 2.3
2.3.3.3	3. Submits that pedestrian flow paths cater for approved capacity and dwelling areas around traffic intersections and pedestrian road crossings to be designed to cater for maximum crowd capacities.	These matters have been considered during development of the definition design described in the EIS. Further consideration would be given during detailed design and construction planning. ATC would need to consult with other authorities and modify its existing practices for the management of large events in both the construction and permanent operations phases.	The ATC does not agree with this response. See comment to 2.3
2.3.3.4	4. Submits that a safety audit of the design be conducted by an experienced consultant.	A safety audit reviewing CSELR operational issues would be undertaken during detailed design.	Noted.

2.3.3.5	5. Submits that entry and exit access points cater for both heavy and light vehicle traffic generated by events.	Local traffic, transport and access impacts within the Randwick Precinct, including the Royal Randwick racecourse, are addressed in section 15.3 of the EIS (Volume 1B) and Technical Paper 1 (Volume 2).	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.
		Transport for NSW would work with ATC to review ATC's management plans. Strategies for access continuity for vehicles of all sizes would be considered further during detailed design and the preparation of construction traffic management plans.	 The ATC is recommending that the proponent prepare the following Plans to address the impacts on the RRR and its operations: Transport Construction Management Plan (proposed condition A.21) Traffic and Transport Management Plan (proposed condition A.23) Equine Management Plan (proposed condition A.25) Event Management Plan (proposed condition A.26) Acoustic Report and Noise Management Plan (proposed condition B.13) Landscape Plan (proposed condition C.14) Flood Report (proposed condition G.4) Utility Relocation Strategy (proposed condition K.5)

2.3.3.6	6. Submits that design cater for heavy vehicles crossing the light rail lines at all existing crossover points	Local traffic, transport and access impacts within the Randwick Precinct, including the Royal Randwick racecourse, are addressed in section 15.3 of the EIS (Volume 1B) and Technical Paper 1 (Volume 2). The CSELR proposal would lead to a reduction in the number and functionality of existing crossover points. Transport for NSW would work further with ATC during detailed design and preparation of traffic management plans to allow ATC to continue its existing business operations in parallel with the CSELR.	The ATC does not raise issue with the PIR providing a new Gate 7A is constructed to allow heavy vehicle access to RRR. This is essential to the operations of the RRR and will be impacted by the project. The ATC recommend new conditions (A.41) to address this issue. A.41 is detailed below: <i>Alison Road frontage heavy vehicle -</i> <i>intersection works</i>
			1. Amended plans shall be submitted for a new intersection and race track crossing at Alison Road and Cowper Street that are substantially in accordance with the plans provided by the ATC to the proponent to cater for articulated heavy vehicles access to the infield. Final plans are to be submitted to the Director General for approval in consultation with the ATC prior to commencement of works.
			2. The proponent shall prepare amended plans for the proposed Cowper Street Intersection to provide alternative access to the infield for heavy and light vehicles during events and bump in and out times. Amended plans are to be submitted to the Director General for approval in consultation with the ATC prior to commencement of works

2.3.3.7	7. Submits that all intersections where crossings are located into RRR be traffic light controlled and cater for all directional movements in and out of the racecourse.	The resolution of many of the issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development. Transport for NSW would be seeking to work with ATC to rationalise its entry requirements.	The ATC does not agree with this response The ATC supports ongoing consultation with the proponent as recommended. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR See comment to 2.3
2.3.3.8	8. Submits that a detailed management strategy be provided for the spectator precinct and surrounding major event pedestrian and traffic locations. Areas of specific concern are the pedestrian flow paths on either side of the proposed event stop.	Refer to the comments in item 2.3.3.3 above. Pedestrian flow and traffic impacts have been taken into consideration in the location and conceptual layout of the proposed stop. These matters would be considered further during detailed design. Transport for NSW would work with ATC regarding its modification of existing operating plans in order to minimise the impact on ATC's operations during the construction and operations phases of the CSELR.	The ATC does not agree with this response. See Comment to 2.3
2.3.3.9	9. Submits that evidence be provided by Transport for NSW of consultation with parties ATC is required to consult with as part of its Event Management Plan, including NSW Police, Sydney Buses and RMS.	Transport for NSW would work with ATC and relevant stakeholders to integrate CSELR requirements with existing operational requirements, and considering where appropriate the activities of other event promoters along the CSELR corridor	The ATC does not agree with this response. See comment to 2.3. In addition, the ATC also recommends that the proponent prepares a Stakeholder Engagement Plan (proposed condition A.44) to ensure meaningful consultation with key stakeholders in relation to racing industry stakeholders impacted by the project.

2.3.3.10	10. Submits that in modelling for the Event Management Plan, Transport for NSW should provide evidence that the design and related management strategies provide for equivalent, or improved, capacity to cater for the potential of parallel events at the Sydney Cricket Ground, Centennial Park and Moore Park and RRR. UNSW requirements should be considered on special event days.		A response has not been provided by TfNSW.
3.0 Precinct based impacts			
3.1 Randwid	3.1 Randwick LRV stabling facility – impacts and recommendations		

3.1.1	Regarding loss of function buildings and spaces: Submits that the EIS contains the following incorrect assumption, that the site of the proposed Randwick Stabling Facility 'contains a number of buildings that are currently not used'. Notes that several operational buildings	The resolution of many of the issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development. ATC would be offered an opportunity for continued involvement in the design development through the Urban Domain Reference Group. Please see below for responses to specific recommendations.	The ATC does not agree with this response. The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient certainty for the ATC that these issues can be satisfactorily resolved.
	 are located on the site. The EIS did not fully consider impacts on ATC infrastructure and operations in the following areas: demolition of key functional buildings reconfiguration of intersections and access gates pedestrian paths loss of parking construction in close proximity to the ATC's administration building. 		 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. The ATC recommends a number of conditions relating to the LRV Stabling Facility to ensure existing buildings and car spaces are re-instated by the proponent to ensure the continuing operation of the RRR as follows: Randwick LRV Stabling Facility - Future replacement facilities and carpark (proposed condition A.30) Fully enclosed (proposed condition A.31) Randwick LRV Stabling Facility - Access (proposed condition A.32) Spectator Precinct and main entrance - impacts on existing RRR facilities and spaces (proposed condition A.33) Spectator Precinct and Main Entrance - access to the RRR and Alison Road frontage (proposed condition A.34) Landscaping and environmental impacts on RRR (proposed condition C.14) Shadow Impact and visual analysis for the LRV Stabling Facility (proposed C.15)

3.1.1.1	Recommendations 11. Approval and reconstruction of all buildings and associated infrastructure (including entry gates, parking, layback, bore water pumps and signage) which is being demolished must take place in a location of no lesser size, capacity and functionality, in consultation with ATC.	11. A commitment to mitigating impacts on existing racecourse infrastructure would be subject to consultation with and negotiations between ATC and Transport for NSW.	See comment to 3.1.1
3.1.1.2	12. Security office and amenities will need to be reconstructed within the vicinity of the revised main entry gate location for surveillance purposes.	12. The proposal recognises the function of the security office and related amenities. Relevant impacts and mitigation measures would be discussed during negotiations between ATC and Transport for NSW.	See comment to 3.1.1
3.1.1.3	13. Transport for NSW to conduct a full audit of buildings including inclusion, infrastructure, parking etc. and provide a report including design of proposed solutions	13. Detailed information about any impacts on buildings and infrastructure at Royal Randwick racecourse would be provided through detailed design. ATC would be consulted throughout the detailed design phase.	See comment to 3.1.1
3.1.1.4	14. Completion of any replacement facility or infrastructure is to occur prior to demolition of the existing facilities to ensure that the functional capacity of RRR is maintained both during and post construction	14. Refer to response 3.1.1.1 above.	See comment to 3.1.1

3.1.1.6	 16. Recommends a replacement car park be designed on the existing main spectator precinct driveway and taxi way. In order to cater for the number of car spaces lost, a deck car park facility will be required. All design, approvals and construction and associated costs to be at Transport for NSW's cost. (Note: refer to Woods Bagot appendix – indicative concept plan for the proposed deck car park solution providing 740 replacement spaces). 	16. The construction of a deck car park is outside the scope of the CSELR proposal and is not currently being considered. The recommendation may be raised during negotiations for the project agreement between ATC and Transport for NSW.	Noted.
3.1.2.1	Submits that the proposed Randwick stabling facility will impact pedestrian and vehicular access through Gate 19 and 20a. (Note: Appendix C has further details).	Pedestrian and vehicular access through Gate 19 and 20a would be considered during detailed design.	See comment to 3.1.1.5
3.1.2.2	Submits that the proposed Randwick stabling facility will impact on Gate 1.	Access in relation to Gate 1 would be considered during detailed design.	See comment to 3.1.1.5

3.1.2.3	Recommendations: 17. The loss of access capacity to RRR to be taken into account in the revised design of Gate 1, and may require reconfiguration of gates 2, 5 and 18 to counter loss of vehicle and pedestrian capacity at Gate 1.	17. The reconfiguration of Gates 2, 5 and 18 to mitigate access capacity impacts would be considered in detailed design.	See comment to 3.1.1.5
3.1.2.4	18. Proposes the reconfiguration of the intersection at Alison and Doncaster roads to cater for vehicles entering and exiting via Alison Road frontage of the proposed stabling facility.	18. Proposed reconfiguration of the intersection at Alison Road and Doncaster Avenue would be considered during detailed design.	See comment to 3.1.1.5
3.1.2.5	 19. Proposes investigation into the relocation of buses servicing the racecourse in a configuration consistent with the existing ATC busway with the same Alison Road frontage and on the southern side of the light rail tracks. (Note: submission includes an appendix outlining proposed solution) 	19. Refer to section 6.10 of this report for proposed changes to local access arrangements to Royal Randwick racecourse.	See comment to 3.1.1

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		1	
3.1.2.6	20. Concerned about the capacity of the footpath on the southern side of Alison Road to cater for crowds, and the potential conflict with cyclists (given footpath dimensions). Recommends a detailed analysis of these issues.	20. Potential pedestrian, cyclist and traffic conflicts would be considered during detailed design. Refer to section 6.10 of this report for information about proposed design changes to address capacity, access and safety concerns.	See comment to 3.1.1
3.1.2.7	21. Recommends a dedicated pedestrian path along the southern side of Alison Road from Doncaster Road and Wansey Road intersections. Any proposed cycle path should be located on the northern side of Alison Road.	21. Changes to the pedestrian and cycle path are proposed. Refer to section 6.10 of this report.	See comment to 3.1.1
3.1.3	Regarding utilities and services: There are a number of essential services located in and around proposed Randwick stabling facility. Recommendations include:	The resolution of many of these issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development. Transport for NSW would continue to work with ATC to develop appropriate plans for the relocation of utilities and ensure continuity of service.	The ATC does not agree with this response. The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key
3.1.3.1	22. Recommends main head for CCTV and security systems be relocated		issues as recommended by the proponent does not provide sufficient 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 to augment the existing Environmental Management Measures proposed in the PIR.
3.1.3.2	23. Recommends fire indicator panel be relocated, subject to approvals from Fire authority		The ATC is recommending that the proponent prepare the following Plans to address the impacts on the RRR and its operations:
3.1.3.3	24. Requires ATC to remain operating continuously during construction works		 Acoustic Report and Noise Management Plan (condition B.13) Flood Report (condition G.4) Utility Relocation Strategy (condition K.5)

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3.1.3.4	25. Recommends commissioning of a detailed flood report; noting there should be no detrimental effect to any of the ATC land and surrounds		
3.1.3.5	26. Requires all utilities and services on the proposed stabling facility site be diverted and relocated to ensure full operational capacity is maintained at RRR		
3.1.4	Regarding visual and amenity impacts, notes that the visual impact will be highly adverse during construction and operation. Submits that noise mitigation is proposed via 6 metre high acoustic walls to the perimeter of the proposed LRV stabling facility, posing an extreme and negative visual effect on the RRR spectator precinct.	Noise mitigation measures would be determined during the detailed design phase in accordance with mitigation measure B.7and Al.4 in Chapter 8 of this report. The EIS indicates that either a noise wall or an acoustic enclosure (or a combination) may be appropriate to mitigate impacts, as per the assessment. The mitigation would be designed to ensure that the <i>NSW Industrial Noise Policy</i> noise criteria are met. The impacts to visual and landscape character were assessed in section 15.7 of the EIS, noting that the potential landscape impact on the Royal Randwick racecourse spectator precinct would be high and adverse. The visual impact of the stabling facility cannot be fully mitigated; however urban design elements would be considered during detailed design to minimise the impact.	 See comment to 3.1.1 Noise and vibration is a significant issue for the RRR. In this regard, the ATC proposes a number of new conditions to address this issue: A.42 – interface issues between Alison Road and RRR A.43- Existing structures and infrastructure The ATC also recommends the following new condition: B.13 - The proponent shall provide a detailed Acoustic Report and Noise Management Plan prepared by a suitably qualified professional providing an acoustic analysis and mitigation measures for the RRR and surrounds. Final plans and reports are to be submitted to the Director General for approval in consultation with the ATC prior to commencement of works. A report will be prepared on completion of the project to confirm compliance with acoustic performance criteria.
3.1.4.1	Submits that a detailed urban planning review and consideration of the visual impact be prepared to ensure adequate visual screening and mature landscaping is provided.	Technical Paper 10 of the EIS (Volume 5) provides a detailed landscape and visual assessment of the CSELR proposal. Urban and landscape design would be undertaken as part of the detailed design and ATC would be consulted as part of the Urban Domain Reference Group.	See comment to 3.1.1

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3.1.4.2	Recommendations: 27. That the LRV stabling facility be fully enclosed.	The resolution of these issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development.	The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR.
		ATC would be offered an opportunity for continued involvement in the design development of the Randwick stabling facility through the Urban Domain Reference Group. Responses to specific recommendations are provided below:	Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient certainty for the ATC that these issues can be satisfactorily resolved.
		27. Experience worldwide in similar situations suggests that an enclosure would not be required; however this would be reviewed in the detailed design stage in accordance with mitigation measures B.7 and AI.4 (refer Chapter 8 of this report) which relate to noise mitigation.	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. The ATC recommends a number of conditions
			relating to the LRV Stabling Facility to ensure existing buildings and car spaces are re-instated by the proponent to ensure the continuing operation of the RRR (Conditions A.30, A.32, A.33, A.34)
3.1.4.3	28. That external walls on the LRV stabling facility be treated fully with landscaping and screening to interface and complement the existing RRR spectator precinct.	28. Treatment of external walls to the stabling facility would be determined during detailed design in consultation with ATC.	See comment to 3.1.1
3.1.4.4	29. That a shadow analysis be conducted to understand impacts of LRV stabling on adjoining buildings, racing infrastructure and landscaping.	29. Mitigation measure AI.4 (refer Chapter 8 of this report) requires consideration of a range of alternate noise mitigation measures to meet the <i>NSW Industrial Noise Policy</i> criteria, taking into account potential cost, visual and overshadowing impacts. A shadow analysis would therefore be undertaken during detailed design to inform this process.	The ATC does not agree with this response. The ATC recommends that the proponent prepare a shadow impact and visual analysis as detailed in proposed condition C.14 – Landscaping and environmental impacts on RRR.

3.1.4.5	30. That a detailed analysis and report be commissioned to determine air quality impacts from cleaning processes proposed to be carried out at the LRV stabling facility.	30. The air quality assessment within the EIS states that maintenance activities within the Randwick stabling facility site would generate minor gaseous emissions from combustion of fuel in plant and machinery. However, gaseous emissions of this nature would be intermittent and transient in nature and would not significantly contribute to local air pollution levels. On this basis, it is not considered that a further detailed study is required. Mitigation measures AK.1 and AK.2 (refer Chapter 8 of this report) have been recommended to manage potential operational air quality impacts.	See comment to 3.1.1 In addition, the ATC also recommends a new condition K.6 to ensure that air quality is maintained during and post construction as detailed below Air Quality The proponent shall provide a Hazardous Materials Report prepared by a suitably qualified professional that includes procedures for construction, site remediation works and emission from the LRV stabling facility. The Report shall include an air quality assessment post construction. The Report is to be submitted to the Director General for approval in consultation with the ATC prior to commencement of works. All statutory health and safety requirements are to be followed at all times to ensure the safety of ATC staff, RRR visitors, patrons and horses are protected at all times during and post construction. All approvals and associated costs to comply with the report will be at the proponents expense.
3.1.4.6	31. That a detailed acoustic analysis should be provided confirming acoustic impacts and proposed mitigation measures.	31. Refer to response 3.1.4.2 above.	See comment to 3.1.4.2
3.1.4.7	Notes that noise contours have not been provided in the EIS for the LRV Randwick stabling facility. Recommendations: 32. That a detailed acoustic report and Noise Management Strategy be provided to determine the impact on the adjoining properties and beyond.	 32. Refer to response for 3.1.4.2 above. These recommendations would be considered further by Transport for NSW as part of the detailed design of the proposed Randwick stabling facility. Detailed visual analysis and acoustic analysis would form part of the detailed design investigations. The acoustic analysis would include an Operational Noise and Vibration Review, which would determine the design of acoustic measures required to meet the NSW <i>Industrial Noise Policy</i> criteria at affected sensitive receptors. 	See comment to 3.1.1

3.2 Specta	tor precinct and main entrance		
3.2.1	Regarding loss of functional buildings and spaces. Notes that the RRR stop will be located adjacent to the main entrance to the RRR, and will require the removal of the Alison Road Swab Building and existing busway, along with a minimum of 150 car parking spaces in areas associated with the Swab building and busway.	As stated in section 15.3 of the EIS (Volume 1B), some loss of parking would occur; however the exact number of impacted car spaces is subject to detailed measurement and to negotiations between Transport for NSW and ATC, and would be resolved through the detailed design process. Table 15.33 of the EIS (Volume 1B) outlines the potential impacts of the proposal on the Swab building, noting that this building is of high heritage significance.	See comment to 3.1.1
3.2.1.1	Notes that the Swab building (proposed to be removed) has development approval for a conference facility, office and café.	Noted.	See comment to 3.1.1 In the ATC recommends a new condition A.33 to ensure the replacement of the Swab building including appropriate heritage interpretation measures.
3.2.1.2	Recommendations: 33. That reconstruction of the capacity of the Swab building must be provided	The resolution of many of the issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development. ATC would be offered an opportunity for continued involvement in the design development of the proposal in the vicinity of the Royal Randwick racecourse through the Urban Domain Reference Group.	The ATC does not agree with this response. The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key
3.2.1.3	34. That the design of the proposed new Swab building be integrated into the event RRR stop development and replacement development approval provided.	 Specific recommendations, design matters and investigations would be considered during detailed design and construction planning for the CSELR proposal. It is noted that, in respect of the Swab building: integration of a replacement building into the Royal Randwick racecourse stop is not suitable reconstruction of the Swab building is unlikely to be reasonably practicable 	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. The ATC is recommending a condition to provide certainty for the RRR in relation to the Swab Building

3.2.1.4	35. That approval and reconstruction of all buildings and associated infrastructure including entry gates, fencing, queuing areas and shelters, ticket offices, turnstiles, landscaping take place in a manner, location and design of no lesser size and functionality.	 Transport for NSW would provide alternate facilities to offset the impact if required, in consultation with ATC. Transport for NSW would seek to provide alternate facilities (where required) at a time that would minimise disruption to ATC's operations. Responsibility for obtaining necessary planning approvals is subject to negotiations with ATC. 	that requires the proponent to provide a new facility to replace the Swab Building, including all approvals and costs in consultation with the ATC. (Condition A.33)
3.2.1.5	36. That any buildings/infrastructure being demolished must be reconstructed and completed prior to the commencement of demolition to ensure that the functional capacity of RRR is maintained.		
3.2.2	Regarding access: Notes that Gate 1 is the main entry into RRR for vehicles and pedestrians to the spectator precinct. Gate 1 provides the only heavy vehicle access to the infield for bump-in/bump-out traffic associated with events.	Noted.	Noted. See comments in relation to new Gate 7A as outlined in the submission.
3.2.2.1	Regarding Gate 1 – Construction Notes that the construction of the Randwick LRV stabling facility entry and exit tracks will impact on accessibility through Gate 1 for both pedestrians and	Access arrangements during construction would be subject to further discussions between Transport for NSW and ATC. A traffic management plan would be prepared by the contractor which would address access arrangements during construction.	See comment to 3.1.1

	vehicles. States that it is 'not acceptable for access to Gate 1 to be significantly compromised during construction'.	Transport for NSW would work with ATC and relevant stakeholders to integrate CSELR requirements with existing operational requirements.	
3.2.2.2	Recommendation: 37. That a detailed traffic management and construction staging plan be provided to identify the impact during construction on proposed traffic and pedestrian management strategies to ensure existing volumes of traffic, pedestrians and equine movements are catered for throughout construction safely.	This would be incorporated into the traffic management plan.	See comment 2.3 & 3.1.1
3.2.2.3	Regarding Gate 1 – Construction Recommendations 38. That the intersection at Gate 1 be signalised, and retain right turn in and out capability.	Access arrangements during construction would be subject to further discussions and negotiations between Transport for NSW and ATC. A traffic management plan would be prepared by the contractor which would address access arrangements during construction. Transport for NSW would work with ATC and relevant stakeholders to integrate CSELR requirements with existing operational requirements. Responses to specific recommendations are provided below: 38. Consideration would be given during the detailed design phase to signalising Gate 1 to control access from Alison Road into the racecourse and across the CSELR alignment.	See comment to 3.1.1
3.2.2.4	39. That the access to the LRV stabling facility be moved to the Doncaster Road end of the site to lessen the conflict of uses at Gate 1.	39. The access into the Randwick stabling facility would be considered during the detail design phase; however Transport for NSW does not have intentions to move the access away from Gate 1.	See comment to 3.1.1

3.2.2.5	40. That the ATC's design for Cowper Street intersection be constructed to provide alternative access to the infield for heavy and light vehicles during events and the bump in/bump out thereof.	40. Consideration would be given during the detailed design phase to providing a new Gate opposite Cowper Street to allow in-field access.	This issue is addressed in the submission. Also See comment to 2.3.3.6
3.2.2.6	Regarding the ATC's proposed hotel development: Notes that CSELR will impact on the entry and access arrangements of the proposed hotel, which is currently being assessed by P&I. Notes that a right hand turn from Alison Road into the hotel development is required.	Proposed changes to access arrangements described in section 6.10 of this report have taken into account the proposed hotel development. However, traffic and access design to date does not include a right hand turn into the proposed hotel development. The CSELR does not preclude future construction by ATC of a right turn from Alison Road eastbound into the hotel development, should ATC desire this. Further consultation with ATC would be conducted in relation to this matter, during detailed design.	The ATC does not agree with this response. As detailed in the ATC's original submission, the Light rail alignment will impact on the entry and access arrangements of the proposed hotel which is currently under assessment by the Department of Planning and Infrastructure. The ATC requires a right hand turn from Alison Road into the hotel development. Alison Road (to the west of Darley Rd) was shown in the EIS as having three lanes by using existing spare carriageway width at this location. This spare width was relied on to accommodate the right turn lane to the hotel. The ATC has been negotiating this arrangement for many months through the department with RMS and Sydney Buses. All issues relating to both RMS and Sydney Buses queries were responded to by the ATC noting the intersections ability to cater for this proposed arrangement without detrimental affects to the operation of the intersection. The ATC recommends a new condition A.36 to address issues relating to the hotel development and light rail. See comment to 1.2.9 & 2.2.2

3.2.2.7	Recommendations: 41. That Alison Road/Darley Road intersections need to be designed to cater for the ATC's proposed hotel development which is a State Significant project	Refer response to 3.2.2.6 above in respect to recommendations 41 and 42, as these are matters which are required to support ATC's proposed hotel development. The CSELR does not preclude the ATC from undertaking the proposed hotel and associated works (such as substation relocations) in the future. ATC would be offered an opportunity for continued involvement in the design development of the proposal in the vicinity of the Royal Randwick racecourse through the Urban Domain Reference Group, which would enable consultation and consideration of the interrelationship of the CSELR with the proposed hotel development.	 The ATC does not agree with this response. The ATC recommends the following conditions to address these issues: Spectator Precinct and Main Entrance - access to the RRR and Alison Road frontage (proposed condition A.34) RRR identification signage (proposed condition A.35) Proposed Hotel Building (A.36)
3.2.2.8	42. That the appendices to the submission (no.397) identify an indicative intersection arrangement design that caters for both the proposed right hand turn and the light rail corridor	Section 6.11 of this report outlines the proposed changes to the CSELR alignment and stops along Alison Road and Wansey Road. As part of the ongoing refinement of the design and the reduction of environmental impacts, the CSELR alignment along Alison Road has been amended slightly to reduce the impacts on the existing mature Fig trees to the south of Alison Road along the boundary of the Royal Randwick racecourse.	
3.2.2.9	43. That the J86-Energy Australia Kiosk would require relocation into an underground chamber given the importance of this frontage to the presentation of RRR		
3.2.2.10	44. That the proposed RRR entry sign design will require redesign/relocation		
3.2.2.11	45. That existing ATC fig trees along Alison Road should be retained		
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Notes that light rail tracks are proposed to pass only a few metres to the north of the administration building, coming within approximately one metre of the building. Potential implications on the function and operation of this building include:Electro-magnetic fields (EMF) from the overhead wiring are assessed in section 10.10, Volume 1A of the EIS. The EIS assessment states:The additional tracks are the building. Potential implications Australian and international standards, thereby minimising the risk associated with EMF exposure. A clearance of three metres would be adopted between the 750 volt overhead contact wires to personThe	A.37 Administration Building The proponent must prepare the following dditional information in relation to the administration Building: . Specialist technical reports outlining the impacts and associated recommendations
proposed to pass only a few metres to the north of the administration building, coming within approximately one metre of the building. Potential implications on the function and operation of this building include:Electro-magnetic fields (EMF) from the overhead wiring are assessed in section 10.10, Volume 1A of the EIS. The EIS assessment states:Th ad ad assessment states:'The CSELR would be designed to comply with appropriate Australian and international standards, thereby minimising the risk associated with EMF exposure. A clearance of three metres would be adopted between the 750 volt overhead contact wires to personTh	dditional information in relation to the dministration Building: . Specialist technical reports outlining the
the building. Potential implications on the function and operation of this building include: ^{1.} Australian and international standards, thereby minimising the risk associated with EMF exposure. A clearance of three metres would be adopted between the 750 volt overhead contact wires to person	
 structural integrity of the building existing services to the building awnings and external structures vibration associated with ground works, construction and operation internal acoustic environment loss of shade due to tree removal air conditioning systems overload as a result of increased loads. Notes that the EIS does not justify close proximity of power cables to the administration building; in particular the light rail power lines that may have health impacts. May also interfere with performance of visual display units and other electronic equipment 	 confirming the design is satisfactory for the maximum loads envisaged during major events along the whole length of the Spectator Precinct Alison Road frontage including signalised crossing locations on Alison Road. A safety design report confirming the design complies with all applicable standards and best practices as well as requirements for relevant state agencies including the NSW Police Service. Amended design indicating the proposed pedestrian and crowd control fencing including proposed secure zones during construction and operation using world best practice.

3.2.3.1	 Notes that light rail will require removal of perimeter fencing, gates and trees which currently form the interface between Alison Road and the administration building. Removal of trees will result in: Ioss of formal pedestrian access around the Alison Road frontage of the building, and resultant safety risk for pedestrians 	These matters would be considered during detailed design in consultation with ATC. The administration building has been identified as a noise sensitive receiver and construction noise impacts on this building have been assessed in the EIS. It is noted that in terms of operational noise impacts, commercial buildings and offices or administration buildings are not considered to be sensitive land uses under the Environment Protection Authority's (2013) <i>Rail Infrastructure Noise Guideline</i> (RING).	See comment for 3.1.4
	 a hazardous exit from the building to Alison Road for ATC staff and visitors accessing the administration building 		
	 increased risk of vandalism and theft to the administration building 		
	 significantly increased noise levels inside the building. 		
	Notes that the above listed issues have not been addressed in the EIS.		
	Notes that the administration building was not identified as a sensitive noise receiver and therefore no noise impact assessment has been provided in the EIS.		

3.2.3.2	Recommendations: Requests that the following are provided by Transport for NSW: 48. Specialised technical reports outlining the impacts and associated recommendations including design and specifications to mitigate any impacts of the above issues during construction and operation	These specific recommendations, design matters and investigations would be considered during detailed design and construction planning for the CSELR proposal. Transport for NSW would consult with ATC in relation to these matters. Transport for NSW would work with ATC and relevant stakeholders to integrate CSELR requirements with existing operational requirements.	See comment for 2.3 and 2.33
3.2.3.3	49. A detailed pedestrian modelling report confirming the design is satisfactory for the maximum loads envisaged during major events along the whole length of the Spectator Precinct Alison Road frontage including signalised crossing locations on Alison Road.		
3.2.3.4	50. A safety in design report confirming the design complies with all applicable standards and best practices as well as NSW Police Department requirements.		

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3.2.4	Regarding the RRR light rail stop	Transport for NSW would work with ATC and relevant stakeholders to integrate CSELR requirements with existing operational requirements.	See comment on 2.2.2 in relation to ATC's comments and recommendation in relation to the Spectator Precinct.
	 Notes significant concerns about the location and layout of the RRR stop – as follows: Poor public egress along Alison Road to the east, west and 		The ATC does not agree with the response in relation to the RRR stop. This area has not been sufficiently resolved to ensure pedestrian safety during major events, raceday and non-raceday events.
	potentially north of the RRR stop. It is not clear which side of the light rail tracks the pedestrian		Further, the response does not demonstrate a sufficient bus layover area. The ATC recommends the following new condition:
	pathway will be located. It is not clear how pedestrians will safely		RRR Event Stop
	access RRR and the RRR stop, because the alignment and stop layout allow for no public egress between the administration building and the light rail tracks.		The proponent must investigate further design options in consultation with the ATC and other relevant state agencies including TfNSW, RMS, Sydney Buses and the NSW Police. The investigations are to:
	 ATC installed a busway to reduce risk to patron safety. Suggests the plan to relocate the buses to lane 1 of Alison Road will be a backward step. 		 Establish the parameters of the station/stop and finalise the design detail and associated supporting documentation as to how the RRR Stop integrates with other modes of transport particularly in relation to major special event operations.
	 It is unclear how taxis would load/unload and queue around RRR stop in the proposed 		 The approved 55,000 person capacity for the RRR must be maintained at all times.
	arrangement.		 Identify options to relocate the bus stop out of the Alison road corridor to improve safety of pedestrians and patrons, maximise pedestrian thoroughfare widths and minimise impacts on the capacity of Alison Road.
			4. Use a qualified specialist consultant to confirm pedestrian and mode split safety

	 It is not clear whether the grade separation between the stop platform and the RRR entrance concourse will be able to comply with accessibility requirements or whether regrading will require reconfiguration of the existing ticket and turnstile gates. During the construction period the EIS indicates that the busway will be closed. Closure of the busway will affect event patron access. 		 Confirm the re-location of lighting, CCTV, public address, ticket and turnstile gates, fencing and all other key pieces of infrastructure associated with the RRR Stop facility and reconcile against the existing arrangements. Further details including amended plans are to be submitted to the Director General for approval in consultation with the ATC prior to commencement of works.
3.2.4.1	Recommendations: 52. That further design options need to be considered in consultation with ATC.	These specific recommendations, design matters and investigations would be considered during detailed design and construction planning for the CSELR proposal. Transport for NSW would consult with ATC in relation to these matters. Refer to Item 2.3 above regarding the responsibility for	See comment for 3.2.4
3.2.4.2	53. That an investigation to establish the parameters of the stop be undertaken.	development and implementation of event management plans Transport for NSW would work with ATC and relevant stakeholders to integrate CSELR requirements with existing operational requirements. Transport for NSW would also coordinate with ATC to minimise the impact of works on events.	
3.2.4.3	54. That Transport for NSW identifies options to relocate the bus stop and taxi zone out of the Alison Road corridor.		

Australian Turf Club			Club
ROYAL	ROSEHILL	CANTERBURY	WARWICK
RANDWICK	GARDENS	PARK	

3.2.4.4	55. That design documentation must be developed to confirm the relocation of ATC signage, lighting, CCTV, public address, ticket and turnstile gates, fencing and all other key pieces of infrastructure associated with the RRR stop.		
3.2.4.5	56. That Transport for NSW provide a detailed construction management and staging plan to explain how major event pedestrian and vehicle activity will be managed around the RRR stop construction zone and the balance of the Alison Road frontage.		
3.2.4.6	Regarding heritage: Notes that the area around the RRR main entrance contains a large amount of heritage – including heritage items and interpretive features.	Noted.	See comment for 1.2.15
3.2.4.7	Recommendations: 57. That a detailed design incorporating the replacement Swab building, how it proposes to retain interpretive heritage features and proposed finishes and landscaping be provided	Section 15.8.4 of the EIS (Volume 1B) outlines the commitment to prepare a photographic archival recording of the Alison Road and Wansey Road boundaries, the north-western area and the Swab Building, prior to works commencing. ATC's recommendation regarding a replacement Swab building with interpretive heritage features is subject to consultation and negotiation with Transport for NSW through the detailed design phase. The landscaping	See comment for 3.2.1.1
3.2.4.8	Regarding landscaping:		

	Recommendations: 58. That detailed landscaping plans be provided to address the main pedestrian entrance to RRR and ensure it is consistent with the quantum and quality of the existing landscaping	recommendation would be considered during detailed design in consultation with ATC.	See comment for 3.1.1 and recommended condition A.42 and C.14 which maintain high quality landscaping outcomes for the RRR, particularly at the interface with the Spectator Precinct and boundaries to the RRR along Alison Road.	
3.2.5	 Regarding services Notes that services and utilities are impacted in the vicinity of the RRR stop that may require relocation or diversion, including: External lighting and signage In ground infrastructure – electrical and communications CCTV installation Public address system Fire boosters Water Irrigation. 	The utility recommendations are noted and would be considered further during detailed design. Existing utilities would be protected or relocated in consultation with the relevant utility authorities. Agreements are being negotiated between Transport for NSW and utility authorities in relation to these matters. Detailed flood investigations would also be conducted as part of the detailed design of the proposal.	See comment for 1.2.18 and 3.1.3	
3.3 Alison R	3.3 Alison Road frontage			

3.1.1 Concerned about loss of trees along Alison Road, and consequent visual and amenity impacts to RRR.	Subsequent to the publication of the EIS, Transport for NSW has refined the design of the alignment along Alison Road east of Darley Road. The amended design would slightly reduce the impacts on the existing mature Fig trees to the south of Alison Road along the boundary of the Royal Randwick recordures. Refer	The extensive landscape setting of the RRR is a critical feature of the site to be protected and retained. In particular, the substantial fig trees along
	to section 6.11 of this report for details of the proposed design changes. Information contained in this report supersedes some of	Alison Road should be retained where possible or as a last resort, removed and replaced with identical species.
	15.6 of the EIS (Volume 1B).	The ATC recommends 2 key conditions relating to landscaping (A.34 and C14).
		A relevant extract from A.34 is provided below:
		All existing Figs Trees located within the RRR frontages shall be retained or relocated as agreed with the ATC.
Removal of significant trees may pose a safety risk to horses during training, track work, barrier trials and race events.	Transport for NSW would consult with ATC in relation to the manner of tree removal.	See comment for 3.3.1.1
Recommendations: 59. That details of proposed temporary construction and	The resolution of many of the issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development.	The ATC does not agree with this response. The ATC supports an Urban Domain Reference Group.
permanent fencing, and visual screening solutions (including new tree plantings) are provided	ATC would be offered an opportunity for continued involvement in the design development through the Urban Domain Reference Group.	However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR.
	Specific recommendations, design matters and investigations would	Therefore, to defer the resolution of a number of key
60. That details of proposed temporary construction and permanent fencing, and visual	be considered during detailed design and construction planning for the CSELR proposal.	issues as recommended by the proponent does not provide sufficient certainty for the ATC that these issues can be satisfactorily resolved.
screening solutions (including new tree plantings) are provided		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.
	 along Alison Road, and consequent visual and amenity impacts to RRR. Removal of significant trees may pose a safety risk to horses during training, track work, barrier trials and race events. Recommendations: 59. That details of proposed temporary construction and permanent fencing, and visual screening solutions (including new tree plantings) are provided 60. That details of proposed temporary construction and permanent fencing, and visual screening solutions (including new tree plantings) are provided 	along Alison Road, and consequent visual and amenity impacts to RRR. refined the design of the alignment along Alison Road east of Darley Road. The amended design would slightly reduce the impacts on the existing mature Fig trees to the south of Alison Road along the boundary of the Royal Randwick racecourse. Refer to section 6.11 of this report for details of the proposed design changes. Information contained in this report supersedes some of the information about impacts on planted trees contained in section 15.6 of the EIS (Volume 1B). Removal of significant trees may pose a safety risk to horses during training, track work, barrier trials and race events. Transport for NSW would consult with ATC in relation to the manner of tree removal. Recommendations: 59. That details of proposed temporary construction and permanent fencing, and visual screening solutions (including new tree plantings) are provided The resolution of many of the issues raised by ATC would be achieved either through the detailed design development. 60. That details of proposed temporary construction and permanent fencing, and visual screening solutions (including new tree plantings) are provided Specific recommendations, design matters and investigations would be considered during detailed design and construction planning for the CSELR proposal.

3.3.1.5	61. That the fencing solution ensure the security of the RRR site and that width of existing access road is maintained
3.3.1.6	62. That details of proposed temporary construction and permanent fencing, and visual screening solutions (including new tree plantings) are provided
3.3.1.7	63. That Transport for NSW design and construct a new intersection and race track crossing, to cater for articulated heavy vehicles across to the infield
3.3.1.8	64. That Transport for NSW cover the costs of relocating buildings, infrastructure and/or services
3.4 Stables	precinct

3.4.1	Regarding the approved equine stabling facility. Notes that the EIS does not assess the potential impacts of CSELR on the approved horse stables facilities. It appears that all light rail options through this section would impact on the building footprint and access arrangements for the approved horse stabling facility.	The design changes proposed in this area, including proposed relocation of the Wansey Road and UNSW High Street stops, avoid the permanent impact to the approved equine stabling facility. Further detail is provided in section 6.11 of this report.	See comment on 2.3.1
	Recommendations: 65. That Transport for NSW provide a report identifying impacts of light rail on approved horse stabling facility including recommendations for mitigation measures.	Ongoing discussions would occur with ATC as part of the acquisition of land for the CSELR or through the detailed design development. ATC would be offered an opportunity for continued involvement in the design development through the Urban Domain Reference Group. Specific recommendations, design matters and investigations would be considered during detailed design and construction planning for the CSELR proposal.	See comment on 2.3.1
	66. That amendments to the approval hose stabling facility design be completed at Transport for NSW's expense.	The presence of an existing residential building is noted, and impacts on this building would be addressed during the detailed design stage.	
	67. That the estimated construction cost of the revised design for the horse stabling facility does not exceed the estimated cost of the original approved design.		

68. That access is the approved horse facility to ensure co continue during co light rail.	e stabling onstruction can	See comment on 2.3.1
3.4.2 Regarding the exis notes that a reside within the RRR gro impacted by light re Recommendations	ntial building unds may be ail.	The ATC does not agree with this response. The ATC recommends the following new condition to ensure the protection of existing structures and buildings at the RRR (condition A.43) Existing structures, infrastructure and services
69. That impact on building is assesse noise, vibration, ac residential amenity construction and o	d, including cess and during	1. The proponent is to provide a Dilapidation Report prepared by an appropriately qualified professional assessing the impacts on all existing buildings structures and infrastructure located within and/or associated with RRR (including the existing residence on the RRR) to determine any impacts including noise, vibration, access and residential amenity both during construction and operation and appropriate mitigation measures as agreed
70. That any buildi infrastructure or se relocation should h proponent's expen	rvices requiring appen at	by the ATC. The Plan is to be submitted to the Director General for approval in consultation with the ATC prior to commencement of works.
		2. Any building, infrastructure or services requiring relocation as a result of Light Rail should be designed, approved and constructed at the proponent's cost. This condition is not intended to limit any claims that the property owner may have against the Proponent.
3.4.3 Access		

3.5 Wansey	Road and High Street Stop		
3.4.3.3	72. That a report be prepared, including design documentation, confirming configuration and replacement of existing capacity at access points.		
3.4.3.2	Recommendations: 71. That a CMP is prepared to confirm ongoing access, at the current capacity, during construction		
3.4.3.1	Regarding access Notes that 24 hour access to the site needs to be maintained through Gates 8, 9 and 10. In particular, loss of access via Gate 10 during construction and operation is not acceptable.	This matter would be subject to further discussion with ATC. Transport for NSW would work with ATC to ensure that the functions provided by Gates 8, 9 and 10 can continue to be satisfied. This would be achieved through detailed design and through the construction traffic management plan to be prepared for the site.	See comment 2.3.1

3.5.1	 Regarding loss of functional buildings and structures Notes that the light rail alignment along the western side of the existing Wansey Road carriageway, and the High Street stop layout, will require the demolition of a number of existing buildings and structures, including: a water tank used for irrigation of the RRR existing equine stables located along the Wansey Road buildings located on the corner of High Street, as part of an integrated stabling complex. Notes there are no locations available to temporarily or permanently house replacement stables other than the proposed new stabling facility to be located at the corner of Alison and Wansey Roads. 	The design changes proposed in this area, including proposed relocation of the Wansey Road and UNSW High Street stops, prevent impact to the items listed. Further detail is provided in section 6.11 of this report.	Noted.
3.5.1.1	Recommendations: 73. That impacted buildings, infrastructure and services be relocated/reconstructed prior to commencement of light rail construction.	The resolution of many of the issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development. It is noted that the design changes proposed in this area, including proposed relocation of the Wansey Road and UNSW High Street stops, prevent impacts to the items listed. Further detail is provided in section 6.11 of this report.	The ATC does not agree with this response The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient certainty for the ATC

3.5.1.2	74. That the proponent assist ATC to cover the cost of consultation with the racing industry and renegotiation of licences and agreements.	Specific recommendations, design matters and investigations would be considered during detailed design and construction planning for the CSELR proposal.	that these issues can be satisfactorily resolved. 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. The ATC is recommending that the proponent prepare the following Plans to address the impacts
3.5.1.3	75. That a detail equine management plan be prepared for this area.		 on the RRR and its operations: Transport Construction Management Plan (condition A.21) Traffic and Transport Management Plan (condition A.23) Equine Management Plan (condition A.25) Event Management Plan (condition A.26) Acoustic Report and Noise Management Plan (condition B.13) Landscape Plan (Condition C.14) Flood Report (condition G.4) Utility Relocation Strategy (condition K.5)
3.5.1.4	76. That the construction of the new horse stabling complex commence immediately at the proponent's expense.		
3.5.2	Regarding access Notes that around-the-clock access to Gate 12 is required during construction and operation. Access ramp may need to be relocated to an alternate location on High Street. -clock access to Gate 12 is required during construction and operation. Access ramp may need to be relocated to an alternate location on High Street.	Transport for NSW would work with ATC to ensure that the functions provided by Gates 12 can continue to be satisfied. This would be achieved through detailed design and through the construction traffic management plan to be prepared for the site.	Noted.

3.5.3	Regarding noise and vibration, there is concern about noise and vibration impacts on up to 209 horses in the nearby equine stables.	It is noted that the relevant Interim Construction Noise Guideline does not address noise impacts on horses. Ongoing consultation with ATC would be required throughout the construction period to manage impacts on horses. It is anticipated that the experience of ATC in managing the noise and vibration impacts of their own construction activities on the site in recent years would be useful to inform the development of potential mitigation measures, where possible, in the detailed design phase. Please also refer to mitigation measure S.3 in Chapter 8 of this report, which includes a requirement for communication with ATC (as owner of the horse stables) on the timing, duration and likely noise levels for the works.	See comment on 1.2.2 & 1.2.10
3.5.4	Regarding structural stability and landscaping, there is concern about the loss of trees on the western side of Wansey Road, and the landscaping treatment.	The EIS identifies the impact of the proposed Wansey Road alignment on tree loss in section 15.6 (Volume 1B). The impacts of the tree loss on structural stability, soil and landscaping would be taken into consideration during detailed design and are also discussed in section 5.16.2 of this report. Refer to section 6.11 of this report for an update on tree impacts to the south of Alison Road along the Royal Randwick racecourse boundary.	See comment on 1.2.9
3.6 Lower H	ligh Street precinct	1	

3.6.1.1 3.6.1.2	Concerned about construction impacts of the proposed substation, noting the proximity to equine stables.	Section 10.10 of the EIS (Volume 1A) states that 'the CSELR would be designed to comply with appropriate Australian and international standards, thereby minimising the risk associated with EMF exposure. A clearance of three metres would be adopted between the 750 volt overhead contact wires to person or infrastructure to minimise, any impact to the public from exposure to EMF.' Details of EMF levels and any required mitigation would be developed during detailed design. The potential impacts on horses and people working with horses in close proximity to the proposed substation would be taken into consideration during detailed design and in consultation with ATC.	 The ATC does not agree with this response. The ATC recommend the following condition to address this issue in relation to impacts on all activities at RRR (equine and human) <i>Electromagnetic field radiation (EMR)</i> 1. The proponent shall provide an EMR Assessment Report prepared by a suitably qualified professional. The Report shall include consideration of any potential impacts on: a. People, horses and/or Visual Display Units in the Administration and any other buildings located in a zone of influence (from Light Rail power sources). b. The proposed hotel development at the RRR. c. Approved horse stabling facility d. Any other areas where new power sources are in the vicinity of people and/or horses. e. Horses from operation of substations at High Street and Anzac Parade, the proposed Stabling Yard and the site boundary adjacent to Alison Road. The Plan is to be submitted to the Director General for approval in consultation with the ATC prior to commencement of works. Further EMR report should be prepared on completion of the project to ensure compliance.
3.7 Traffic ma	nagement		

	Notes that RRR hosts a number of events and these events are to be maintained throughout construction and operation. Notes that event demand is heavily reliant on buses; so on- going and effective bus operation is required.	Transport for NSW acknowledges the ongoing event schedule at Royal Randwick racecourse. Management of events during construction and operation would be considered further during detailed design and construction planning by Transport for NSW and the contractor, with regard to ATC's Event Management Plan. In addition, management during construction would be incorporated into the CEMP to be prepared by the contractor.	See comment on 2.3
3.7.1	Regarding alternate in-field access, ATC suggests improvements to Cowper Street intersection to create a cross-track access road to the RRR from the intersection in order to mitigate construction impacts to Gate 1 and 8 accesses.	The resolution of many of the issues raised by ATC would be achieved either through the negotiations between Transport for NSW and ATC required as part of the acquisition of land for the CSELR, or through the detailed design development, including the mitigation of access impacts associated with changes to Gates 1 and 8.	The ATC does not agree with this response. The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not provide sufficient certainty for the ATC that these
3.7.2	Regarding Alison Road capacity		issues can be satisfactorily resolved. 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
	and safety.		 The ATC is recommending that the proponent prepare the following Plans to address the impacts on the RRR and its operations: Transport Construction Management Plan (condition A.21) Traffic and Transport Management Plan (condition A.23) Equine Management Plan (condition A.25) Event Management Plan (condition A.26) Acoustic Report and Noise Management Plan (condition B.13) Landscape Plan (Condition C.14) Flood Report (condition G.4) Utility Relocation Strategy (condition K.5)

	Notes that the distance from the new stop line on Alison Road to the pedestrian crossing on Doncaster Parade is potentially unsafe.	Detailed design would consider safety implications, noting the proposed distance between the stop line on Alison Road and the Doncaster Parade pedestrian crossing. A traffic management plan for construction would be prepared by the contractor. Traffic and transport management would form part of the operating procedures to be development by the future	See comment on 3.7.1
3.7.3	Regarding alternate accesses: Notes that closing the gate on Alison Road would have a major impact to RRR (Gate 1). References EIS Table 15.8, and notes that the internal ATC road system is not suitable to support proposed change.	Operator of the CSELR. ATC would be consulted in relation to issues relating to Royal Randwick racecourse. Section 6.10 of this report outlines proposed changes to the local access arrangements for Royal Randwick racecourse that seek to overcome issues identified with the operation of the interchange.	See comment on 2.3
3.7.4	Regarding LRV stabling facility access (Ascot Street): Seeks clarification regarding entry and exit points to stabling facility, noting inconsistencies in the EIS. ATC supports the arrangement of a one-way system with entrance off Ascot Road and exit via Doncaster Avenue.		

3.7.4.1	Recommendations: 77. Refer to diagram in submission (pp.31–34)) showing recommended Alison Road transport interchange solutions.		
3.8 Car par	king		
3.8.1	Notes that a likely immediate direct impact of parking will see a loss of 715 car spaces – refer to Table 3, page 35 of the submission.	Some loss of parking would occur; however the exact number of car parks affected is subject to detailed design and negotiations between Transport for NSW and ATC. As indicated earlier, Transport for NSW's assessment of the number of racecourse parking spaces impacted is significantly lower than the number put forward by ATC.	See comment on 3.1.1.5
3.9 Noise a	nd vibration		
3.9.1	Regarding impacts on horses and stable buildings. Note: this issue has been raised prior in the submission.	Refer to responses 1.2.10, 1.2.14 and 3.1.4.	See comment on 1.2.2 & 1.2.10
3.9.2	Regarding noise from the LRV Randwick stabling facility. Note: this issue has been raised prior in the submission.	Refer to response 3.1.4.7.	See comment on 1.2.2 & 1.2.10
3.10 Visual	amenity		

3.10.1	Notes there is insufficient information in the EIS regarding how significant visual and amenity issues will be resolved.	Technical Paper 10 of the EIS (Volume 5) provides a detailed landscape and visual assessment of the CSELR proposal based on the definition design. Urban and landscape design would be undertaken as part of the detailed design. ATC would be offered an opportunity for continued involvement in the design development through the Urban Domain Reference Group, as relevant to the Royal Randwick racecourse.	See comment on 1.2.13
3.11 Heritage	9		
3.11.1	Recommendations: 78. That heritage interpretation measures in relation to RRR be to the satisfaction of ATC.	ATC would be consulted in relation to heritage interpretation measures in relation to Royal Randwick racecourse. Heritage impacts are identified in section 15.8 of the EIS (Volume 1B).	
3.12 Stormw	ater and flooding		
3.12.1	Regarding flooding Requests that Transport for NSW provide details of the proposed solution to flood protecting the light rail alignment, and the LRV Randwick stabling facility, and demonstrate that it will not cause exacerbated flood impacts on the RRR. At this stage it is not clear whether compliance with the NSW Floodplain Development Manual can be achieved.	Further detailed flood modeling and stormwater investigations would be undertaken during detailed design. Compliance with the <i>NSW Floodplain Development Manual</i> would be a key consideration of these studies.	See comments on 1.2.17 and 1.2.18

3.12.2	 Regarding stormwater management Notes that the following stormwater management issues should be addressed: The existing stormwater culvert, assumed to collect stormwater from upper Alison Road, which discharges to the detention basin located to the east of the existing infield tunnel, will require redirecting. Opportunity to integrate Wansey Road works with future stabling development could result in an efficient stormwater infrastructure arrangement with treatment benefits for both schemes. Water sensitive urban design measures, including measures to prevent 	
	the discharge of oils, greases and pollutants into land and water adjacent to ATC land – should be included in the EIS.	

ROYAL ROSEHILL CANTERBURY WARWICK RANDWICK GARDENS PARK FARM

Notes that utilities, services and water supply will be impacted by the proposal. Specifically:, the proposed stop location is in close	These matters would be considered further during detailed design of utility relocations, and would be subject to negotiations between Transport for NSW and ATC.	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
proximity to, or contains:		The ATC is recommending that the proponent
 a fire hydrant booster and a designated area for fire truck access 		prepare Utility Relocation Strategy (condition K.5) to address the impacts on the RRR and its operations.
 gas and water pipes 		
 kiosk type substation and in 		
ground HV/LV cable from		
substation. Other affected utilities:		
 all services near the administration building 		
 hydrant ring main diversion works may be required 		
 stormwater and sewer drainage 		
 power supply (noting electrically powered gates) 		
 CCTV infrastructure 		
 communications wiring. 		
Regarding electricity network capacity.	Transport for NSW has consulted with Ausgrid in relation to electricity supply. The existing network has adequate capacity to cater for the CSELR proposal. Protection or relocation of electricity	
completed to demonstrate that local electricity network infrastructure is adequate without further constraining existing operations or growth from other	assets would be subject to a separate agreement between Transport for NSW and Ausgrid.	
	 water supply will be impacted by the proposal. Specifically:, the proposed stop location is in close proximity to, or contains: a fire hydrant booster and a designated area for fire truck access gas and water pipes kiosk type substation and in ground HV/LV cable from substation. Other affected utilities: all services near the administration building hydrant ring main diversion works may be required stormwater and sewer drainage power supply (noting electrically powered gates) CCTV infrastructure communications wiring. Regarding electricity network capacity. Suggests a full assessment be completed to demonstrate that local electricity network infrastructure is adequate without further constraining existing	water supply will be impacted by the proposal. Specifically:, the proposed stop location is in close proximity to, or contains: of utility relocations, and would be subject to negotiations between transport for NSW and ATC. • a fire hydrant booster and a designated area for fire truck access • gas and water pipes • kiosk type substation and in ground HV/LV cable from substation. Other affected utilities: • all services near the administration building • hydrant ring main diversion works may be required • stomwater and sewer drainage • power supply (noting electrically powered gates) • CCTV infrastructure • CCTV infrastructure • communications wiring. Suggests a full assessment be completed to demonstrate that local electricity network infrastructure is adequate without further constraining existing operations or growth from other Transport for NSW has consulted with Ausgrid in relation to electricity supply. The existing network has adequate capacity to cater for the CSELR proposal. Protection or electricity assets would be subject to a separate agreement between Transport for NSW and Ausgrid.

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3.13.2	Regarding future conduit capacity; physical capacity and access to be maintained.		
3.13.3.1	Recommendations: 79. That a new tank be constructed to replace the function of the water tank on Wansey Road (set to be impacted by the proposal)	Section 6.11 of this report outlines an updated proposal for the relocation of the UNSW High Street stop into High Street, significantly reducing the impact of the proposal on the existing racecourse facilities and eliminating the need to re-locate the water tank and horse stable(s). Whilst these particular impacts have been avoided through redesign, the resolution of responsibilities for statutory approvals, design, construction and other associated costs for impacts on ATC's land are subject to further negotiations	Noted. The ATC supports an Urban Domain Reference Group. However, there is no current agreement between Transport for NSW and the ATC relating to outstanding matters for the RRR. Therefore, to defer the resolution of a number of key issues as recommended by the proponent does not
3.13.3.2	80. That alternative bore water infrastructure be provided to replace the impacted infrastructure.		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
3.13.3.3	81. That the LRV stabling facility is constructed in such a way that the supply of clean bore water in the underlying aquifer is maintained.		See comment for 3.13.3.2
3.13.3.4	82. Those statutory approvals, design, construction and other associated costs are at the proponent's expense.		See comment for 3.13.3.2
3.14 Other i	ssues		

3.14.1	Regarding air quality Recommendations: 83. That a hazardous materials report be prepared, outlining recommended remediation procedures for building and remediation works.	Hazardous materials surveys would be undertaken for any buildings fully or partially demolished as a result of the CSELR proposal. Measures would be developed for the management and disposal of hazardous materials encountered. A Phase 2 ESA is currently in progress and would consider remediation procedures for contaminated land.	See comment for 3.1.4.5
	84. That all statutory health and safety requirements be followed.	Transport for NSW would comply with all statutory requirements in relation to health and safety.	Noted.
	85. That a detailed report on air quality control procedures within the LRV Randwick stabling facility be provided.	Measures to address air quality management during construction would be incorporated into the CEMP to be prepared by the contractor.	See comment for 3.1.4.5
3.14.2	Regarding electromagnetic fields (EMF) Recommendations 86. That impacts on people and visual display units in nearby buildings be taken into consideration .	Refer to response 3.2.3 above.	See comment for 3.2.3
	87. That impacts on the proposed hotel development be assessed	Section 15.4 of the EIS (Volume 1B) outlines the relationship between the CSELR proposal and the Royal Randwick Master Plan. The design of the CSELR has considered the Royal Randwick Master Plan to ensure the proposal does not preclude development identified in the Master Plan. Refer also to responses 3.2.2.6 and 3.2.2.7 above for impacts related to hotel.	See comment for 3.2.2.6 & 3.2.2.7

3.14.3	That detailed capacity modelling and reports be prepared, identifying the	The Randwick UAP has not yet been formally consulted and is therefore subject to change. P&I would need to consider the interaction of the CSELR with the draft UAP and approved developments on Royal Randwick racecourse land as part of its determination of the proposal.	See comments for 1.2.9 & 1.2.21
	ability of the proposal to cater for the forecast UAP populations.	The UAP was considered in terms of the overall patronage for the CSELR proposal.	
	89. That driveways and intersections should be designed in keeping with the locations identified in the draft UAP Structure Plan.	It is suggested that ATC refers the other matters listed to P&I as part of its consultation process in relation to the UAP.	
	90. That the design, engineering and construction of the proposal cater for the UAP, including future basement structures, service provision through and under the light rail infrastructure and the ability to develop adjacent to, and possibly over, the light rail.		The ATC does not agree with this response. The ATC recommends the following condition A.28 to address impacts on the boundaries with the RRR:
	91. That no battered retaining walls be designed within RRR.		A.28 Light Rail interface with RRR
	92. That the retaining wall structures for Alison Road,		There should be no new battered retaining walls designed or constructed within the RRR.
	Wansey Road and High Street be designed to include penetrations at adequate intervals to cater for future service provision.		Alison Road, Wansey Road and High Street retaining walls and associated structures shall be designed to include penetrations at adequate intervals to cater for future service provision required by the RRR, including provision under racetracks.