



NSW GOVERNMENT
Department of Planning

***MAJOR PROJECT ASSESSMENT:
Royal Randwick Racecourse
Stage 1 Works – 2008 Upgrade***

Director-General's
Environmental Assessment Report
Section 75I of the
*Environmental Planning and Assessment Act
1979*

*Prepared by Randwick City Council under
Instrument of Delegation dated 30 July 2007*

February 2008



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1 EXECUTIVE SUMMARY

- 1.1 This Director General's Environmental Assessment Report has been prepared pursuant to Part 3A of the Environmental Planning and Assessment Act 1979 (as amended) in relation to the Royal Randwick Racecourse (RRR) Stage 1 Infrastructure Works. The project consists of Stage 1 Works for the Royal Randwick Racecourse inclusive of works to facilitate the staging of the World Youth Day events.
- 1.2 The Director General, as delegate of the Minister for Planning, advised Randwick City Council in July 2007, that the proposal is a Major Project and subject to Part 3A of the Environmental Planning and Assessment Act 1979 (as amended).
- 1.3 The Director General also agreed to delegate his planning and assessment functions to Randwick City Council as contained in an Instrument of Delegation dated 30 July 2007. Council, accordingly, exhibited the proposal and undertook the assessment and drafting of the Director General's Environmental Assessment Report to the Minister.
- 1.4 The proposal was exhibited for more than the requisite 30 days between 11 December 2007 and 31 January 2008. A number of submissions were received in response to the public exhibition/consultation process.
- 1.5 Key issues raised in the assessment concerned local traffic and parking, heritage, landscaping drainage and operational matters. Local amenity impacts resulting from the construction and operation of the proposal have additionally been considered.
- 1.6 The proposed Stage 1 Works will strengthen and enhance the function of the Royal Randwick Racecourse facility primarily as a thoroughbred racing venue and additionally as a tourism, leisure and events venue both locally and internationally.
- 1.7 In addressing the issues raised above, Council is of the view that the proponent has satisfactorily mitigated the environmental impacts arising from the proposed development and adequately maintained the amenity of the local area. In assessing the proposal, Council has resolved any outstanding environmental issues through recommended conditions of approval.
- 1.8 The Department has worked closely with Randwick City Council. This has ensured an effective and efficient approval process.
- 1.9 Recommended conditions of approval are provided at **Appendix A**. The reasons for the imposition of conditions are to maintain the amenity of the local area and adequately mitigate the environmental impact of the development.

2 BACKGROUND

2.1 Background

As a thoroughbred racing, training and spectator facility, the RRR is a heritage significant, cultural landmark both locally and nationally and increasingly an international context.

The proposed development will facilitate improved access to, around and within the subject site; meet the future infrastructure needs of the RRR to hold racing and event functions; and ensure safety of all users of the facility.

Site Location

The RRR is located primarily on Alison Road, Randwick, with frontages also to Doncaster Avenue, High Street, Anzac Parade and Wansey Road, in the Randwick Local Government Area, and approximately 5 kilometres from the Sydney CBD (see **Figure 1**).

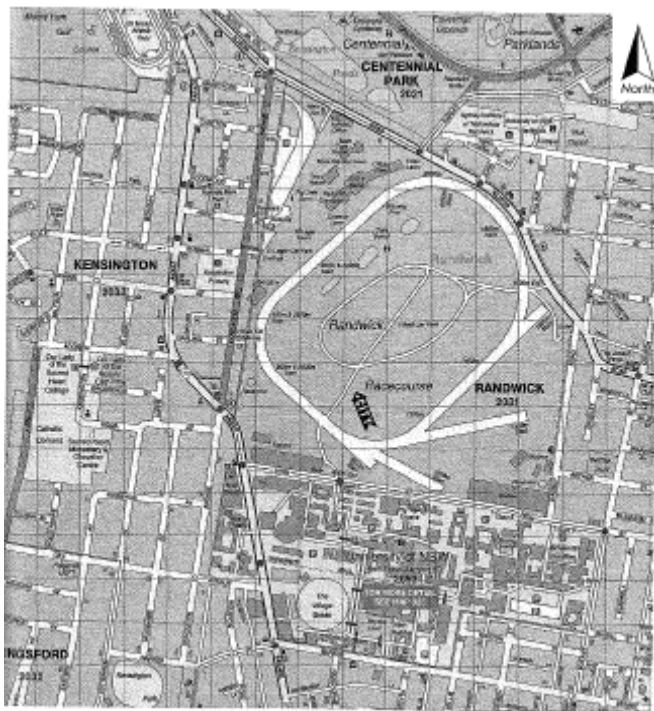


Figure 1: Site Location

2.2 Site Description

The RRR site has an area of 79 hectares. It forms part of a system of regional open spaces including Centennial Park, Moore Park, Queen's Park, and a number of golf courses extending down to Eastlakes and Botany Bay.

The RRR site essentially comprises the following primary uses :

Racetracks - occupying the majority of the site centrally.

Spectator Precinct - comprising the main spectator assembly and viewing area on racedays with a concentration of buildings/structures, a number of which are significant in heritage and landscape terms. It contains the grandstands, betting facilities, food and beverage facilities, grassed spectator areas, day stall for horses during race days, the AJC administration buildings, the major fences along Alison Road and gateways for pedestrians, vehicles and horse vehicles on race days, vet clinic and drug testing

laboratory, and the race day operations areas involving event management, trainers and jockey facilities and the parade ring.

High Street Precinct – comprising predominantly stabling uses located in a band extending from behind buildings fronting Doncaster Avenue and along High Street up to the High Street access point, the second major vehicle entrance for the RRR site allowing vehicular traffic to the stables and the Infield Precinct.

Steeple Hill Precinct – a section of high ground rising some 30 metres to the south-east corner of the RRR site. Sited largely along High Street, it contains stables with access from High Street and Wansey Road.

Infield Precinct – a grassed area in the centre of the racetrack that is primarily used for morning training sessions and occasionally for carparking on racedays. This precinct is connected to the High Street access point by an under-track vehicular tunnel and to the Spectator Precinct by an undertrack pedestrian tunnel.

Mid-field Precinct - an area between the main racetracks and training tracks adjacent to the Spectator Precinct. Containing mainly grass, gardens and ornamental ponds, it also houses structures including the Semaphore Board, Finishing Post, and video screens.

Services Precinct – an area consisting of several single storey buildings used for site maintenance and other administration functions with main entry off Alison Road as well as directly from Doncaster Avenue. During race days it also serves as a parking area for staff, members, bookies and media.



Figure 2: Aerial Photo

2.3 Surrounding land uses

Framing the site to the west is a line of dwelling houses fronting Doncaster Avenue a number of which are heritage items including a row of Federation-period Queen Ann single-storey row houses at No. 68-82 Doncaster Avenue. To the south is High Street with the University of New South Wales campus beyond. To the east is Wansey Road with a mix of dwelling houses and older-style residential flat buildings in the residential area beyond. The Randwick Town Centre is located further to the east of this area. To the north is Alison Road which has an intersection with Darley Road on the opposite northern side across from the heritage Former Turnstile Building at Gate 6.

3 PROPOSED DEVELOPMENT

3.1 Proposal

The development is for RRR Stage 1 Works – 2008 Upgrade comprising six (6) key elements of public domain and infrastructure works with a number of these works facilitating the staging of the Vigil and Mass for World Youth Day (WYD) to be held on site on 19 and 20 July 2008. World Youth Day works will form a subset of the overall RRR Stage 1 Works, and are to be completed by mid July 2008. The six key elements of the Stage 1 Works – 2008 are as follows:

1. Alison Road Entry Plaza/Busway:

- demolish existing wall and gates along Alison Road generally between the Administration Building and Gate 7, except for former Turnstile Buildings (Gates 4 and 6)
- demolish eastern part of existing day stalls to either side of Swab Building
- make good surface
- new landscaped entry plaza and parallel roadway to accommodate buses on major race days and car parking at other times
- three new crossovers to Alison Road: between Administration Building and Gate 4, at Darley Road intersection and east of Gate 6
- new boundary fencing (inc median and kerb) and landscaping

2. Oaks Drive/Ascot Street/High Street Connection:

- demolish southern arm of existing day stalls/entrance structure/fence to south of Administration Building
- new Oaks Drive roadway, linking Alison Road and Ascot Street/Doncaster Avenue, for taxis/hire cars on major race days and car parking at other times
- retain former Tramway Turnstile Building and access stairs but widen single lane bridge over stairs
- reconfigure Ascot Street/Doncaster Avenue intersection
- upgrade existing internal road system to High Street for horse floats and service vehicles
- formalise roadway from Oaks Drive to Gates 19 & 20
- landscape and fence Oaks Drive and western perimeter

3. New Day Stalls:

- new Day Stalls incorporating new swab facilities and pre-parade ring to south-west of existing Paddock Stand with new marquee stand above
- new roadway from new High Street Connection to loading dock at southern end of Paddock Stand
- landscaping and fencing

4. Spectator Precinct Public Domain Improvements:

- remove extraneous landscaping and fencing
- dismantle Oaks Marquee
- make good surface
- return Oaks Marquee to original position following WYD
- retain and expand part of former day stalls as concession stands
- new paving, signage, wayfinding and landscaping
- new fencing, entry gates, turnstiles and ticketing

5. Midfield/Infield Infrastructure Works:

- remove existing maintenance shed and semaphore board from Midfield
- locate maintenance shed in north-east of site adjacent to stripping stalls
- infill existing ornamental ponds in Midfield
- install services opposite existing grandstands as overlay area for race day corporate use in temporary structures (subject to separate application)
- provide pedestrian access from Midfield to grandstand areas and Infield
- relocate semaphore board

6. Stormwater Management:

- relocate existing/construct new stormwater detention basins in response to stormwater management strategy for Stage 1 Works.

The Stage 1 Works will cater for the existing RRR peak capacity of 55,000 patrons (including members).

Plans of the development as proposed are included in the proponent's Environmental Assessment provided in **Volume 2**.

Figures 3, 4, 5 and 6 below indicates generally how the site is to be developed and integrated with the existing RRR facility.



Figure 3: Context & Site Plan - development proposal

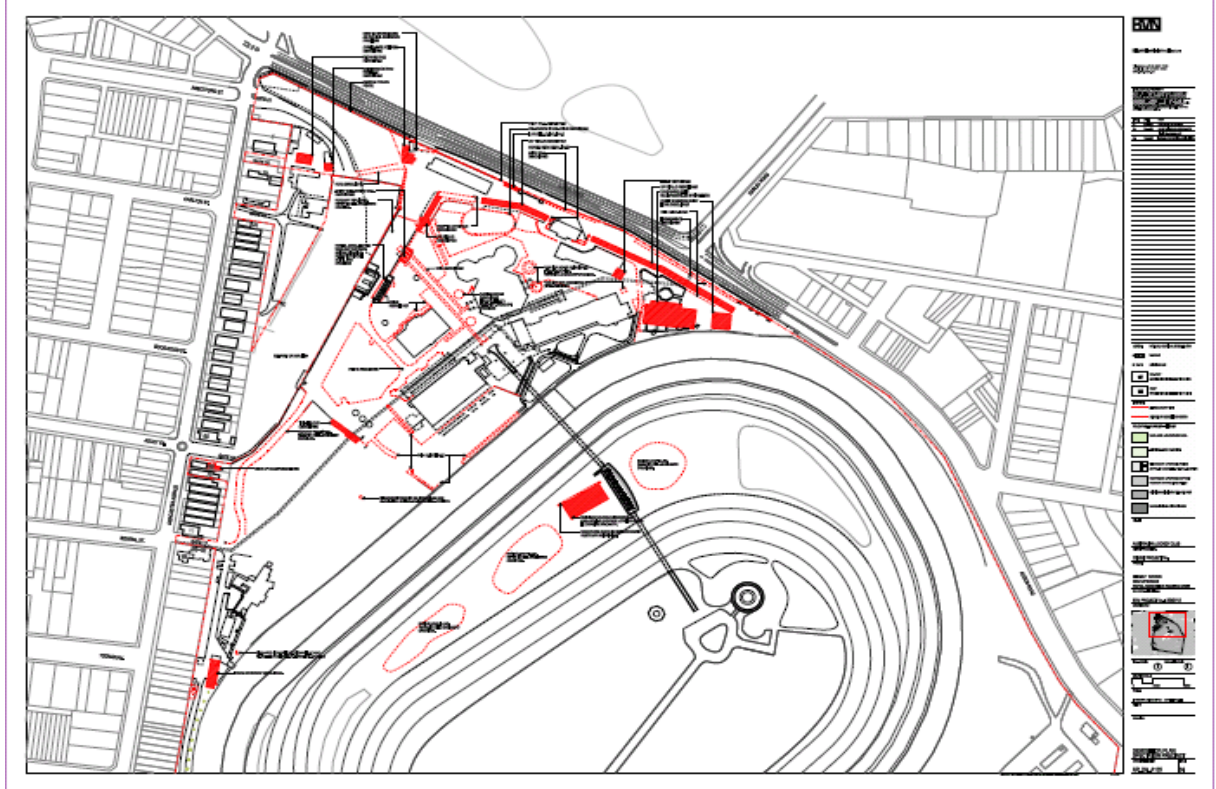


Figure 4 - development proposal



Figure 5 - development proposal

4 STATUTORY CONTEXT

STATUTORY FRAMEWORK

4.1 Major Project Declaration

Part 3A of the Environmental Planning and Assessment Act 1979

Under Part 3A of the Environmental Planning and Assessment Act, and specifically the provisions of Section 75B of the Act, development may be declared to be a Major Project by virtue of a State Environmental Planning Policy (SEPP) or by order of the Minister published in the Government Gazette.

The proposed development is a Major Project under SEPP (Major Projects) 2005 being described in Schedule 1, namely Clause 15(2)(a) as a *major sporting facility*.

On 30 July 2007, an Instrument of Delegation was issued by the Director-General of Planning, delegating the public consultation and assessment of the application to Council in accordance with Section 75H(3) of the Act. The opinion was formed by the Minister in July 2007. The Director-General's requirements were subsequently issued by Council on 15 October 2007, listing issues to be addressed in the proponent's Environmental Assessment (EA).

4.2 State Environmental Planning Policy (Major Projects) 2005

State Environmental Planning Policy (Major Projects) 2005 was gazetted on 25 May 2005. This SEPP essentially sets out clear criteria to establish which proposals are state significant major projects for the purposes of Part 3A of the Act. Under the SEPP the Minister for Planning will now take responsibility for making determinations on any large-scale construction projects in excess of \$30 million where it is considered that they are important in achieving State or regional planning objectives. Major infrastructure projects such as hospitals, research facilities, universities, schools, TAFEs, prisons and transport, energy and water infrastructure will now also be determined by the Minister.

For the purposes of the SEPP certain forms of development may be considered a Major Project if the Minister (or his delegate) forms the opinion that the development meets criteria within the SEPP.

4.3 State Environmental Planning Policy No. 55 – Remediation of Land

SEPP 55 requires a consent authority to consider whether the land is contaminated, and if so, whether the land will be remediated before the land is used for the intended purpose.

Council recommends conditions relating to remediation in particular remediation of the proposed New Day Stalls in accordance with the Contaminated Land Management Act 1997 and the National Environment Protection (Assessment of Site Contamination) Measure (NEPM) 1999 and details of compliance are to be provided to Council from a) an Accredited Site Auditor b) a suitably qualified Environmental Consultant upon completion of the remediation works.

4.4 Instrument of Delegation

In accordance with the Instrument of Delegation dated 30 July 2007, the Director General of the Department of Planning delegated certain functions to Randwick City Council in relation to the assessment of the Project Application.

Council assumed responsibility for the following tasks:

- Public consultation and notification of the Project Application.
- Preparation of the report to the Director General detailing the assessment of the Project Application.

- Preparation of a draft instrument of approval on behalf of the Minister.

The Minister for Planning continues to bear responsibility for approval of the Project Application.

4.5 OBJECTS OF THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The objects of any statute provide an overarching framework that informs the purpose and intent of the legislation and gives guidance to its operation. The Minister's consideration and determination of a project application under Part 3A must be informed by the relevant provisions of the Act, consistent with the backdrops of the objects of the Act.

The objects of the Act in section 5 are as follows:

- (a) to encourage:
- (i) the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment,
 - (ii) the promotion and co-ordination of the orderly and economic use and development of land,
 - (iii) the protection, provision and co-ordination of communication and utility services,
 - (iv) the provision of land for public purposes,
 - (v) the provision and co-ordination of community services and facilities, and
 - (vi) the protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats, and
 - (vii) ecologically sustainable development, and
 - (viii) the provision and maintenance of affordable housing, and
- (b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State, and
- (c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.

Of particular relevance to the assessment of the subject application is consideration of the Objects under section 5(a). Relevantly, the Objects stipulated under section 5(a) (i), (iii), (iv), and (v), are significant factors informing the determination of the application. The project does not raise significant issues with regards to (ii), (vi) and (viii).

With respect to ESD, the Act adopts the definition in the *Protection of the Environment Administration Act 1997* including the precautionary principle, the principle of inter-generational equity, the principle of conservation of biological diversity and ecological integrity, and the principle of improved valuation, pricing and incentive mechanisms.

Council has considered the Objects of the Act, including the encouragement of ESD in the assessment of the project application.

Appropriate consideration must be given to the principles of Ecologically Sustainable Development in the assessment of the project application.

Consideration

There are five accepted ESD principles:

- (a) decision-making processes should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations (the integration principle);
- (b) if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (the precautionary principle);

- (c) the principle of inter-generational equity - that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (the inter-generational principle);
- (d) the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making (the biodiversity principle); and
- (e) improved valuation, pricing and incentive mechanisms should be promoted (the valuation principle).

The Council has considered the proposed development in relation to the ESD principles and has made the following conclusions:

- **Integration Principle** – the social and economic benefits of the proposal are well documented. The environmental impacts are and will be addressed through the proponent's Statement of Commitments. Additionally the environmental impacts will be assessed as future applications are. The Council's assessment has duly considered all issues raised by the community and public authorities. The proposal as recommended for approval does not compromise a particular stakeholder or hinder the opportunities of others. The proposal's promotion of good public transport access is very important and supported.
- **Precautionary Principle** – Following an assessment of the proponent's EA it is considered with certainty that there is no threat of serious or irreversible environmental damage as a result of the proposal. The site has been extensively developed for some time and the site has therefore a low level of environmental sensitivity. There is little natural vegetation on the site and the site does not contain any threatened or vulnerable species, populations, communities or significant habitats. In addition, where practical, significant stands of native vegetation will be retained as a part of the proposal.
 - **Climate Change**
The EA states that there are two main sections of the northern side of the Racecourse site that are affected by flooding from external catchment flows. Council recommends conditions requiring the submission and approval of a detailed stormwater management plan/strategy to include a comprehensive Flood Study covering the Racecourse site and immediate grounds prior to issue of construction certificate. It is considered that the recommended conditions provide adequate mitigation measures to address the flooding issue.
 - **Inter-Generational Principle** – It is considered that the proposed development represents a sustainable use of a site which has had a long association with the surrounding community as a horse racing facility and events venue. The proposal will enable the orderly and timely development of land for a strengthened and enhanced racecourse and events use. It is considered that the redevelopment of this site will have positive social, economic and environmental impacts and as a result will provide tourism, recreation, leisure and employment benefits of future generations.
- **Biodiversity Principle** – Following an assessment of the proponent's EA it is considered with certainty that there is no threat of serious or irreversible environmental damage as a result of the proposal. As stated earlier, the site has been extensively developed for some time and the site has therefore a low level of environmental sensitivity. There is little natural vegetation on the site and the site does not contain any threatened or vulnerable species, populations, communities or significant habitats. Therefore the proposal will not impact upon the conservation of biological diversity or ecological integrity.
- **Valuation Principle** – The approach taken for this project has been to assess the environmental impacts of the proposal and identify appropriate safeguards to mitigate adverse environmental effects. The proposal will have a significant environmental value as reflected in the proponent's commitment to mitigate any adverse impact on the heritage, landscape and cultural significance of

the existing racecourse facility. These mitigation measures include the cost of implementing these safeguards in the total project cost.

The proponent's EA includes key ESD objectives to be achieved for the project prepared by Bligh Voller Nield Architecture as listed in Appendix G. The Statement of Commitments commits the proponent to achieving these objectives through adherence to the ESD guidelines prepared by Bligh Voller Nield Architecture with further ESD measures to be developed into the proposal through refinement of the detailed design phase of the proposal. Council is satisfied that ESD issues have been appropriately addressed in the application.

4.6 SECTION 75I(2) OF THE ACT & CLAUSE 8B OF THE ENVIRONMENTAL PLANNING AND ASSESSMENT REGULATION 2000

The DG's report to the Minister for the proposed project satisfied the relevant criteria under Section 75I of the Act as follows:

<i>Section 75I(2) criteria</i>	<i>Response</i>
Copy of the proponent's environmental assessment and any preferred project report;	The Proponent's EA and Preferred Project Report is located on the assessment file.
Any advice provided by public authorities on the project;	A summary of the advice provided by public authorities on the project for the Minister's consideration is set out in Section 5 of this report.
Copy of any report of a panel constituted under Section 75G in respect of the project;	No statutory independent hearing and assessment panel was undertaken in respect of this project.
Copy of or reference to the provisions of any State Environmental Planning Policy that substantially govern the carrying out of the project;	Each relevant SEPP that substantially governs the carrying out of the project is identified in Section 4, including an assessment of the impact of the SEPP on the development proposal in Sections 4 and 5 of this report.
Except in the case of a critical infrastructure project – a copy of or reference to the provisions of any environmental planning instrument that would (but for this Part) substantially govern the carrying out of the project and that have been taken into consideration in the environmental assessment of the project under this Division,	An assessment of the development relative to the prevailing environmental planning instrument is provided in Sections 4 and 5 and Appendix D of this report
Any environmental assessment undertaken by the Director General or other matter the Director General considers appropriate;	The environmental assessment of the project application is this report in its entirety.
A statement relating to compliance with the environmental assessment requirements under this Division with respect to the project.	The environmental assessment of the project application is this report in its entirety.

The DG's report to the Minister for the proposed project satisfied the relevant criteria under Clause 8B of the EP&A Regulation as follows:

<i>Clause 8B criteria</i>	<i>Response</i>
An assessment of the environmental impact of the project	An assessment of the environmental impact of the proposal is discussed in sections 4 and 5 of this report.
Any aspect of the public interest that the Director-General considers relevant to the project	The public interest is discussed in section 6.4 of this report.
The suitability of the site for the project	The proposal is consistent with the RRR DCP 2007.
Copies of submissions received by the Director-General in connection with public consultation under section 75H or a summary of the issues raised in those submissions.	A summary of the issues raised in the submissions is provided in section 5 and Appendix E of this report.

PERMISSIBILITY

4.7 Randwick Local Environmental Plan 1998

The subject land is zoned 6(a) Open Space under the provisions of the Randwick Local Environmental Plan (LEP) 1998.

Clause 18 of the Randwick LEP 1998 states that development for the purpose of the following requires development consent: *buildings ordinarily incidental or ancillary to landscaping, gardening or bushfire*

hazard reduction, car parks, child care centres, clubs, communication facilities, community facilities, helicopter landing sites, outdoor advertising, public transport, recreation facilities, restaurants and roads. All other uses are prohibited.

The proposed Stage 1 Works are consistent with, and permissible in, the zoning of the land under the Randwick LEP 1998.

4.8 Policy Controls

DCP – Royal Randwick Racecourse

In 2006 a Master Plan for the Royal Randwick Racecourse was prepared to address the long term strategic planning of the site and its use in accordance with the master plan requirements of Randwick LEP. The principles and provisions of this Master Plan were subsequently adopted as objectives and controls in the Royal Randwick Racecourse Development Control Plan (RRR DCP) that was adopted by Randwick Council and came into force in June 2007.

Section 3.2.4 of the proponent's Environmental Assessment Report contains a Table of Compliance with the DCP for the RRR. An assessment of this table indicates that the proposal is generally consistent with the provisions of the DCP.

Section 94A Development Contributions Plan 2007

Council's Section 94A Development Contributions Plan 2007 applies to all applications lodged on or after 2 July 2007 in respect of development on land to which the Randwick LEP applies. The Plan authorises Council to charge a levy of one (1) per cent of the cost of carrying out the development. Accordingly, a Section 94A Contribution will be applied on the CIV (Capital Investment Value) as per the EPA Regs for the RRR Project which amounts to \$33,900,000. The Section 94 contribution payable on this amount will be \$339,000. It should be further noted that the application of the Section 94A levy on the proposed development is essential given that the proposed works essentially represent an intensification and long term permanent use of the racecourse as a major venue for racing and other events with significantly large crowd capacity. The demand on public amenities and services to meet this intensity of development provides additional justification for applying the statutory requirement for a Section 94A contribution on the proposed development.

CONSIDERATION OF RELEVANT LEGISLATION

4.9 Other relevant legislation and environmental planning instruments

Section 4.5 provides assessment of the proposed development in relation to the relevant planning controls. The proposed development is consistent with relevant provisions of these instruments.

5 CONSULTATION AND ISSUES RAISED

5.1 Consultation Process

In accordance with the Instrument of Delegation, Council assumed responsibility for coordinating the consultation and exhibition process with Government Departments and members of the public.

Section 75H(3) of the EP&A Act requires that after the Environmental Assessment has been accepted by the Director General, the Director General must, in accordance with any guidelines published in the Gazette, make the environmental assessment publicly available for at least 30 days.

The Director General has not published any specific guidelines in relation to the public exhibition of the Project Application.

The process followed in terms of the public exhibition was as follows:

- The application was placed on exhibition between 11 December 2007 and 31 January 2008.
- Copies of the Environmental Assessment documents were forwarded to relevant Government Departments, namely, the Roads and Traffic Authority (RTA), Heritage Council, and NSW Police.
- Details of the application were forwarded to all owners of land directly adjoining the subject land (i.e. landowners in Alison Road, Doncaster Avenue, High Street, Wansey Road and a section of Anzac Parade.
- Copies of the Environmental Assessment and associated documents were available for inspection at Council's offices in Randwick and at the Department of Planning in Sydney.
- Details of the application were placed on Council and the Department of Planning websites.

5.2 Government Departments

The RTA has made comments in relation to the project and traffic/transport conditions have been applied. No responses were received from the Heritage Council and NSW Police. Notwithstanding this, the proponent has engaged in intensive prelodgement consultations with these departments and adequate conditions will be applied in relation to heritage and security matters in the consent.

5.3 Public Submissions

Eight public submissions were received in response to the public exhibition. A summary of issues raised in these submissions can be found in Appendix E together with the proponent's response to these submissions made on 11 February 2008 followed by Council's comments and assessment. Most of the submissions raised issues related to traffic/transport, access and parking impacts, heritage impact, landscaping/loss of trees and safety/security.

6 ASSESSMENT

6.1 Environmental Assessment Requirements

Section 75F of the Environmental Planning and Assessment Act provides that the Director General is to prepare Environmental Assessment requirements for each project. The Environmental Assessment outlines the matters that the Director General considers should be considered as part of the assessment process.

The Environmental Assessment requirements were prepared by Randwick City Council in consultation with the Department of Planning and forwarded to the applicant for assessment. The Environmental Assessment prepared by planningmatters Pty. Limited forms the basis for consideration of the significant issues associated with the development.

6.2 DIRECTOR GENERAL'S REPORT

The purpose of this submission is for the Director General to provide a report on the project to the Minister for the purposes of deciding whether or not to grant approval to the project pursuant to Section 75J of the Act.

Section 75I(2) sets out the scope of the Director General's report to the Minister. Each of the criteria set out therein have been addressed below, as follows:

(a) a copy of the proponent's environmental assessment and any preferred project report; and

The proponent's environmental assessment is included at **Appendix C**.

(b) any advice provided by public authorities on the project; and

Advice has been provided by the RTA and the Ministry of Transport.

(c) a copy of any report of a panel constituted under Section 75G in respect of the project; and

No independent hearing and assessment panel was undertaken in respect of this project.

(d) a copy of or reference to the provisions of any State Environmental Planning Policy (SEPP) that substantially govern the carrying out of the project; and

A brief assessment of each relevant State Environmental Planning Policies that substantially govern the carrying out of the project is set in **Appendix D**.

(e) except in the case of a critical infrastructure project – a copy of or reference to the provisions of any environmental planning instrument that would (but for this Part) substantially govern the carrying out of the project and that have been taken into consideration in the environmental assessment of the project under this Division; and

An assessment of the development relative to the prevailing environmental planning instrument is provided in **Appendix D**.

(f) any environmental assessment undertaken by the Director General or other matter the Director General considers appropriate.

The environmental assessment of the project is this report in its entirety.

6.3 SIGNIFICANT ISSUES

6.3.1 Impacts on existing uses

The proposed Infrastructure works will facilitate and enhance the existing uses on site (including administration, training, stabling and maintenance) whilst providing improved access arrangements, safety of pedestrians and patrons attending race days and events.

Consideration

The proposed Stage 1 infrastructure works will integrate well with existing uses in the RRR and considered suitable for the subject site.

Resolution

This issue has independently been assessed and addressed by Council.

6.3.2 Civil Works

The proposal will involve works that primarily will affect the configuration and levels on Alison Road and Ascot Street. Council's Development Engineer has inspected the affected parts of the subject site and provided the determined design alignment level (concrete/paved/tiled level) at the Alison Road and Ascot Street property boundary for driveways, access ramps and pathways. Conditions will be applied to ensure that the design alignment level at property boundaries are adhered to.

Consideration

The Civil Works design is acceptable subject to a condition requiring further compliance with design alignment levels prior to issues of construction works.

Resolution

The issues raised have been appropriately addressed. To ensure that adequate provisions for future civil works in the Alison Road and Ascot Street road reserve are provided, relevant conditions of approval at Appendix A, Schedule 2, will be applied.

6.3.3 Heritage

The current proposal has been accompanied by a Specific Element Conservation Policy for the Alison Road Boundary Precinct (Draft Report December 2007), Specific Element Conservation Policy for the Spectator Precinct (Draft Report December 2007), Heritage Impact Statement (HIS) and Interpretation Plan (Stage 1: Strategic Overview Draft Report) all prepared by Godden Mackay Logan Heritage Consultants.

The proposed works will have adverse heritage impacts on a number of buildings, structures and landscape elements on the site. Notwithstanding this, the HIS prepared by Godden Mackay Logan recognises that the conservation of many of the heritage values of the site relies on its continuing use and adaptability to meet the needs and expectations of the horse racing industry and site users, and that heritage significance of individual site components needs to be managed within this context. The HIS notes that ad hoc changes on the site have gradually impacted on the safe and efficient operation of the site, and that the recent loss of the original tramway/busway access to the site has led to the need for comprehensive masterplanning and re-assessment of heritage values. The HIS notes that while significant impacts would be incurred, much would be achieved for the continuing viability of the site. It should be noted that the majority of the heritage significant buildings that will be affected are not listed Heritage Items under the Randwick LEP but are "Contributory Items" (ie., buildings and structures that contribute to the significance of the overall RRR Heritage Conservation Area) of varying degrees of significance within the RRR site. Only one listed heritage item is proposed to be partially demolished, that is, the existing Federation Period Queen Anne terrace at 68 Doncaster Avenue (opposite Ascot Street). This partial demolition is deemed necessary because of the need to provide vehicular access to the RRR site via the existing Ascot Street entry whilst ensuring future access for the former busway site as well. The intrusion of this rear section into the proposed Ascot Street vehicular accessway necessitates partial demolition of No. 68 Doncaster Avenue.

Extensive heritage input has been provided into the preparation of the Master Plan and the design development of the Stage 1 works, and extensive consideration of viable alternative options was undertaken for all aspects of the proposal which would result in more significant heritage impacts, in

order to avoid or minimise them as much as possible. The HIS further notes that a series of additional considerations to avoid, minimise and/or mitigate specific potential adverse heritage impacts associated with the proposal could be resolved at detailed design stage. Of key importance in heritage terms is the comprehensive integration of heritage interpretation initiatives into the detailed design of the landscape and setting of racecourse facilities. This interpretation of the history of the site, its buildings and functional relationships needs to occur in close collaboration with the project architects and landscape architects as part of the detailed design stage. Accordingly, a range of measures, recommended in the HIS, are required in order to avoid, minimise and/or mitigate heritage impacts. Mitigative measures include interpretation of removed elements, minimisation of impact of new works on remaining elements, screening, consideration of relocation or reinstatement of some built and landscape elements, adjustment of new works to ensure retention and health of landscape elements, survey and storage of moveable heritage items, and protective measures.

Consideration

The proposal is satisfactory in relation to heritage impact subject to conditions embodying the mitigative measures recommended in the HIS to minimise potential heritage impacts of the Stage 1 works.

Resolution

The heritage issues raised have been appropriately addressed. To ensure heritage impacts are mitigated, conditions of approval at *Appendix A, Schedule 2*, will be applied.

6.3.4 Landscaping

The applicant has submitted an Arboricultural Report prepared by Guy Paroissien Landscape Matrix Pty Limited, which forms part of the overall Landscape Master Plan (prepared by Knox & Partners Landscape Architects) in Appendix E. The report lists 17 trees recommended for removal, irrespective of any proposed works, due to either poor health, condition, over-maturity and presence of hazardous structural defects. In view of the overall poor conditions of these trees, approval is granted for their removal.

It is noted that there are other trees that are proposed for removal that are not referred to in the Arboricultural Report, namely, the *Araucaria heterophylla* (Norfolk Island Pine) and row of *Lophostemon confertus* between Gates 3 & 4 and Gate 6 & 7 on Alison Road as indicated in Drawings AR_DA_D101 to AR_DA_D102 of the Part 3A Project. The proponent advises that, in the design of the proposed new entry/busway, these Alison Road trees *"were not assessed (in the Arboricultural Report) because design development, a process that involved the architects, landscape architects, heritage consultant and planning, indicated/determined that they would not be able to be saved. While (the proponent is) acutely aware of their significance, especially the Norfolk Pine, the benefits of the new bus plaza and entry outweighed the loss."* The proponent's advice is considered reasonable especially given the following further considerations:

- The proposed Alison Road entry plaza/busway is an essential feature of the RRR upgrade to meet public safety and access requirements of the facility and site.
- The entry plaza/busway has been designed to include a palette of materials that will relate to the heritage components and their setting and enhance the landscape elements of the site.
- The proponent has provided for appropriate replacement trees to enhance the landscape elements on this frontage to Alison Road.

Consideration

The proponent's Arboricultural Report has been assessed, and appropriate inspections carried out, by Council's Landscape Officer. The trees identified for either retention or removal in the project are justified and acceptable. Specifically, the proposal has appropriately integrated the trees to be retained into the proposed development. The trees recommended for removal are structurally defective so that

permission is granted for their removal. The proposed removal of the affected trees along Alison Road has been adequately addressed in terms of the need, viability and overall public benefit of the proposed new entry plaza/busway as discussed above. Overall, the loss of trees arising from the proposal will not give rise to any significant detrimental environmental impact and the trees to be retained combined with all new replacement plantings will be adequate for the proposed facility. A condition requiring the protection of the trees to be retained during and after the construction process will be applied.

Resolution

The landscape issues raised have been appropriately addressed. To ensure the preservation of existing trees to be retained on site and survival of any transplanted specimens, conditions of approval at *Appendix A, Schedule 2*, will be applied to mitigate any potential adverse landscaping impacts.

6.3.5 Transport and Traffic

6.3.5.1 Traffic – Construction Phase

The proponent's Environmental Assessment states that a construction traffic management plan will be prepared for the construction stage to ensure minimal impact on surrounding residential streets. Given the open and vast nature of the subject site, construction traffic can be organized and managed to ensure construction traffic exits directly onto arterial routes.

Consideration

The proponent's Statement of Commitments includes a requirement for traffic management plan detailing the controls to be installed to manage construction traffic. This provision in the Statement of Commitments is generally acceptable subject to a condition to augment the provisions of the relevant commitment.

Resolution

Council is satisfied that the issues raised have been appropriately addressed. To ensure safe construction traffic movements and construction traffic impacts are acceptable, conditions of approval at *Appendix A, Schedule 2*, will be applied to mitigate the impact of construction traffic.

6.3.5.2 Transport – Operational Phase

The proponent's traffic consultant, Masson Wilson Twinney, has prepared a Transport Report assessing the proposed transport improvement works proposed under Stage 1 and their transport implications. The Report advises that the Stage 1 Works will maintain the existing maximum operating capacity of the racecourse at 55,000 patrons including members. The Report identifies a number of works to improve bus and taxi access and pedestrian connectivity at the entrance to and within the subject site including the following:

- construction of a new busway for major race day use adjacent to Alison Road;
- construction of a dual use parking area, race day taxi queuing and drop off/pick up area with access off Ascot Street along the southern section of Oaks Drive;
- provision of significantly improved pedestrian circulation spaces; and
- provision of an improved access road around the south western perimeter of the site so that horse floats and service vehicles will be able to be brought in and exit from High Street rather than from Alison Road.

The report further advises that, in terms of transport access, the proposed works will essentially maintain the existing access arrangements for the Racecourse but in a safer and more organised fashion. In particular the benefits of the transport improvement works include:

- Conditions for bus passengers being set down and picked up will be safer and more comfortable.

- A permanent taxi arrangement will avoid the confusion that arises from varying locations for different race meetings at present. This will allow ground staff to more effectively manage taxi loading and unloading.
- Improved pedestrian space, especially alongside Alison Road, will significantly improve conditions for pedestrians moving to and from the east and west of the site.
- Relocation of access for horse float and service vehicles from Alison Road to High Street will avoid the undesirable interaction of access movements for these vehicles with other traffic and pedestrians on Alison Road.
- Rationalized parking provision on the site will improve conditions for visitors on non race days.
- Proposed permanent access to the site via Ascot Street (Gate 18) would be done in a way that would respect the access needs of the adjoining property access.

Additionally, the report advises that whilst, the proposed Stage 1 works are compatible with existing event management plans and would make them easier to implement, special carnival day event transport management measures would continue to be needed and will continue to evolve in accordance with experience and with any changes in visitors travel habits

The proposed Stage 1 transport works have been referred to the RTA/SRDAC and no objections have been raised by the Authority subject to appropriate traffic/transport measures to minimise impact on existing traffic and transport on Alison Road and other surrounding roads.

Overall, the Stage 1 transport works will improve and enhance the existing transport arrangements of the RRR. Accordingly, the transport impacts arising from the proposed works are acceptable and reasonable subject to conditions requiring further details of the busway design and signal, coach/bus parking, Oaks Drive taxi pick-up and turning, mitigating measures for normal buses on Alison Road.

Consideration

The proposal is satisfactory in relation to transport management and impacts subject to conditions requiring additional details especially of the future form and function of the Alison Road busway and Oaks Drive and the allocation of access at Ascot Street vis-à-vis the privately owned former busway land requiring the implementation of appropriate works identified in the proponent's Transport Report to improve vehicular and pedestrian access.

Resolution

Council is satisfied that the transport issues raised have been appropriately addressed. To ensure improved vehicular and pedestrian access to the proposed development, conditions of approval at *Appendix A, Schedule 2*, will be applied.

6.3.6 Parking

6.3.6.1 Parking – Construction Phase

No indication of the construction parking requirements has been provided in the proponent's Environmental Assessment. Notwithstanding this, any higher short term parking demands of construction workforce can be monitored to ensure that residential areas are protected from unnecessary parking intrusion. Accordingly, a condition requiring that the applicant mitigate parking by construction workers in the residential streets surrounding the RRR is considered appropriate. Specifically, a management plan should be implemented to discourage any use of street parking by construction workers. Any temporary street parking for workers, if considered necessary by Council, should be subject to consultation with residents of affected streets and the cost of implementing such measures should be borne by the proponent.

Consideration

Parking demands of the construction workforce must be appropriately managed to ensure no construction workers park in surrounding residential streets. No commitment has been made to address this issue in the Statement of Commitment. Accordingly, a condition of consent will be applied requiring the applicant to mitigate parking by construction workers in the residential streets surrounding the RRR.

Resolution

Council is satisfied that the issues raised have been appropriately addressed. To ensure appropriate construction phase carparking is provided, conditions of approval at *Appendix A, Schedule 2*, seeks to mitigate potential impact of construction workers parking in the residential streets surrounding the RRR.

6.3.6.2 Parking – Operational Phase

The proponent's traffic consultant, Masson Wilson Twinney, advises in the Transport Report that existing carparking in the infield carpark, amounting to approximately 2,700 carspaces, will continue to be available. Access to this carpark off High Street has been assessed as operating well on major carnival racedays. Egress after these races is also considered satisfactory in conjunction with raceday clearway conditions on the southern side of High Street leading to Anzac Parade.

Consideration

The carparking needs of the RRR facility will continue to be adequately met and serviced on-site.

Resolution

Carparking issues have been appropriately addressed.

6.3.7 Drainage Infrastructure

Drainage for the proposed development is addressed specifically in Appendix F of the proponent's Environmental Assessment and following assessment by Council's Development Engineer, conditions to ensure that the application complies with, and the final Stormwater Management Plan for RRR achieves, the specific objectives and criteria of the RRR DCP as detailed in Chapter 2 of Appendix F.

Additionally, standard drainage conditions relating to the design of the internal drainage networks will also be applied in any consent for the project.

Consideration

The proponent's Statement of Commitments has included a commitment to design and implement the drainage and stormwater system in accordance with a final Stormwater Management Plan that achieves the specific objectives and criteria of the RRR DCP relating to drainage. Conditions will be applied to further augment this commitment and ensure stormwater management is designed in accordance with Council's requirement.

Resolution

Council is satisfied that the issues raised have been appropriately addressed. To ensure appropriate on-site stormwater design and management are incorporated, a condition of approval at *Appendix A, Schedule 2*, seeks to ensure stormwater management designs comply with Council's requirements.

6.3.8 Waste Management Arrangements

The EA advises that waste management procedures for the construction phase are included in the draft Construction Management Plan (Appendix K). The draft Construction Management plan in Appendix K contains a framework for detailing management of construction waste which is considered adequate subject to a condition listing additional details required for waste management.

Operation of the facility will generate a variety of solid and liquid wastes. The EA advises that details of the waste management procedures for the operation of the RRR facility as a consequence of the Stage 1 works will be provided as part of the overall plan of management facility and the proponent's Statement of Commitment reflects this.

Consideration

A condition to reinforce the requirement for a construction management plan inclusive of a waste management plan for both construction and demolition material will be further applied. In relation to operational waste, the proponent's Statement of Commitments has included a commitment to provide details of operational waste management with the overall plan of management for the RRR. A condition will be applied to further augment this commitment.

Resolution

This issue has independently been assessed and addressed by Randwick City Council by way of relevant conditions of approval at *Appendix A, Schedule 2*.

6.3.9 Contamination

Douglas Partners have undertaken a preliminary site contamination assessment of the section of the RRR site that will potentially give rise to soil and groundwater issues, namely the area to be excavated for the New day stalls. The report advises that some tar bound material that is above the industrial waste threshold and some brick and concrete fragments found in this area requires further investigation and appropriate action. In view of this, the EA advises that removal of spoil from the area to be excavated for the new Day Stalls will be necessary as advised in Douglas Partners preliminary site contamination assessment. Accordingly, the proponent's Statement of Commitments includes a requirement for any potentially contaminated soil identified during the excavation process to be dealt with in accordance with the procedures noted in the Report on Preliminary Waste Classification prepared by Douglas Partners (November 2007).

Consideration

The proponent's Statement of Commitments includes a requirement for any potentially contaminated soil identified during the excavation process for the New Day Stalls area to be dealt with in accordance with the procedures noted in the Report on Preliminary Waste Classification prepared by Douglas Partners (November 2007). This provision in the Statement of Commitments is generally acceptable given the nature of contamination identified in the preliminary assessment. To further ensure that the New Day Stalls area is rendered suitable for its intended use, a condition will be applied to ensure this.

Resolution

The issue has been appropriately addressed. To ensure appropriate remediation/management strategies to address soil contamination in the new Days Stalls area, a condition will be applied to ensure the New Day Stalls area is made suitable for its intended use.

6.3.10 Construction Management

Guidelines for management of noise, vibration, dust, soil, and erosion during construction are provided in the draft Construction Management Plan (CMP) prepared by Coffey Projects (Appendix K). The proponent's Statement of Commitments provides for construction management to be consistent with the CMP and lists the general construction hours for the proposed development. These provisions in the Statement of Commitments are acceptable subject to amendments to the general construction hours and the inclusion of additional conditions to ensure that noise and vibration emissions from the construction of the development satisfies the relevant provisions of the *Protection of the Environment Operations Act 1997* and relevant standards relating to noise and vibration for construction.

Consideration

Subject to conditions to control the construction hours of the proposed development, minimise construction noise and vibration and manage potential acid sulphate soils, there is no environmental concern in relation to construction management.

Resolution

Council is satisfied that the issues raised have been appropriately addressed. To ensure appropriate construction management, conditions of approval at *Appendix A, Schedule 2*, seek to ensure appropriate construction hours and minimise construction noise and vibration.

6.4 THE PUBLIC INTEREST

The proposal is in the public interest for the following reasons:

- The proposal is consistent with the current statutory planning controls relating to the site;
- The RRR Stage 1 Infrastructure Works will provide significant benefits of maintaining and growing the Racecourse as an important recreation, leisure, tourism and employment venue internationally, in the State and local community and;
- The proposal will provide adequate infrastructure and safer public acces.

7 CONCLUSION

- 7.1 The RRR Stage 1 Infrastructure Works will provide significant benefits of maintaining and growing the Racecourse as an important recreation, leisure, tourism and employment venue internationally, in the State and local community.
- 7.2 The RRR Stage 1 Infrastructure Works are consistent with the Masterplan/DCP vision for the site which are summarised as follows:
- To provide for the growth of racing, training and spectator numbers and facilities and diversifying non-race day facilities and events.
 - To maintain the RRR's landmark status as a major gateway to Randwick City and provide adequate infrastructure and safer public access.
 - To materially improve transport access and amenity for all patrons within the Racecourse.

Accordingly, the Department considers the development of the subject site for a Stage 1 Infrastructure Works to be of State significance.

- 7.3 The Department has reviewed the environmental assessment in accordance with Section 75(2) of the Act. All the relevant environmental issues associated with the proposal have been extensively assessed. These issues primarily focus on potential heritage, landscape, transport, drainage and operational impacts on existing RRR and the surrounding locality.
- 7.4 The construction and operational impacts can be readily mitigated through the application of measures and practices embodied in a range of Local and State legislation.
- 7.5 The proponent has committed (through Statements of Commitment) to a number of measures to ensure the redevelopment proceeds smoothly and does not adversely impact on local amenity. Council is recommending further conditions of approval to augment commitments made by the proponent.
- 7.6 Council is of the view that the proposal satisfactorily mitigates the environmental impacts arising from the proposed development and adequately maintains the amenity of the local area. In assessing the proposal, Council resolved any outstanding environmental issues through conditions of approval that impose mitigation measures.
- 7.7 The Department has worked closely with Randwick City Council to ensure an effective and efficient approval process. The Director General in delegating his functions under Part 3A of the Act to Council has enabled a consistent approach to be established in stakeholder consultation, exhibition, and assessment and resolution of relevant local issues.
- 7.8 Recommended conditions of approval are provided at **Appendix A**. The reasons for the imposition of conditions are to maintain the amenity of the local area, and adequately mitigate the environmental impact of the development.

8 RECOMMENDATION

It is recommended that the Minister for Planning, pursuant to Section 75J of the Environmental Planning and Assessment Act, 1979 (as amended):

- **Consider** the findings and recommendations of this report; and
- **Approve** the project as outlined in the Environmental Assessment prepared by planningmatters Pty. Limited and the proponent's Statement of Commitments, subject to the conditions of approval set out in the attached instrument of approval at **Appendix A**; and
- **Sign** the attached instrument of approval; and
- **Authorise** the Department to carry out post-determination notification.

APPENDIX A. CONDITIONS OF APPROVAL

APPENDIX B. STATEMENT OF COMMITMENTS

APPENDIX C. ENVIRONMENTAL ASSESSMENT

APPENDIX D. EPI ASSESSMENT

APPENDIX E. PUBLIC SUBMISSIONS

Public Submissions to RRR Stage 1 Works – 2008 Upgrade

Submissions	Proponent's Response	Council's comments
G. Khoury, 3/84 Alison Road, Randwick 2031		
<ul style="list-style-type: none"> Parking restriction on Alison Road due to coach parking on event days deprive residents of on-street parking; lack of notice about restrictions. 	<p>New busway will improve bus management in Alison Road generally.</p> <p>Traffic Management and Accessibility Plan (TMAP), to be prepared in consultation with Council and RTA, to include details of coach parking and requirements to notify local residents of parking restrictions.</p> <p>TMAP will form subsection of AJC Plan of Management (POM) for site as required by RRR DCP and Statement of Commitments (SOC).</p>	<p>Proponent's advice is noted and considered acceptable. Condition to be applied requiring a Transport Management and Accessibility Plan to be prepared and to include details of coach parking and requirements to notify local residents of parking restrictions.</p>
<ul style="list-style-type: none"> Anti-social behaviour of patrons returning to parked coaches. 	<p>AJC POM to address anti-social behaviour, as required by RRR DCP and SOC.</p>	<p>Proponent's advice is noted and considered acceptable. Condition to be applied requiring a Plan of Management to be prepared and to include measures to address, among other things, anti-social behaviour of people attending events in the RRR.</p>
Christa Ludlow, 3 Park Rd, St Leonards NSW 2065		

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Heritage issues inadequately considered given short time frame. No attempt to take on board suggestions of Heritage Impact Statement, eg Gates 4 and 6. 	<p>Recommendations of Heritage Impact Statement (HIS) implemented as far as possible at this stage, eg retention of high value heritage components such as Gates 4 and 6. Continued involvement of heritage consultant to ensure heritage issues addressed in appropriate manner in detailed design, as noted in SOC.</p>	<p>The majority of the heritage significant buildings that will be affected are not listed Heritage Items under the Randwick LEP but are "Contributory Items" (ie., buildings and structures that contribute to the significance of the overall RRR Heritage Conservation Area) of varying degrees of significance within the RRR site. Only one listed heritage item is proposed to be partially demolished, that is, the existing Federation Period Queen Anne terrace at 68 Doncaster Avenue (opposite Ascot Street) to provide for vehicular access to the RRR site via the existing Ascot Street entry. The HIS in fact recognises that conservation of many of the heritage values of the site relies on its continuing use and adaptability to meet the needs and expectations of the horse racing industry and site users, and that heritage significance of individual site components needs to be managed within this context. The HIS notes that while significant impacts would be incurred, much would be achieved for the continuing viability of the site. Accordingly, the HIS recommends a range of measures to avoid, minimise and/or mitigate heritage impacts of the proposed development. Recommendations of the Heritage Impact Statement will be included as conditions of approval for the project.</p>

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Loss of large number of significant trees along Alison Road boundary especially 120 year old Norfolk Island Pine. Plan also involves relocation of some Canary Island Palms. 	<p>Loss of significant trees including those along Alison Road addressed in HIS. Proposed to replace single Norfolk Island Pine signifying former entry, with row of new Norfolk Island Pines to signify new larger entry plaza. New landscaping considered consistent with heritage significance of RRR, as set out in Special Elements Conservation Policy (SECP).</p>	<p>The proponent advises that the loss of trees along the Alison Road boundary has been unavoidable because of the need to provide public safety and access requirements along this primary access point and frontage. The new entry plaza/busway serves an important focal point for access to the RRR and will be provided with new paving and landscape elements, including the provision of a row of new tree planting along the Alison Road frontage to provide a strong visual emphasis and amenity. In relation to the relocation of the Canary Island Palm, the HIS states that <i>"the palm is ... nearing its useful life expectancy and is susceptible to Fusarium Wilt, which may be a factor in whether or not it would survive transplantation or indeed whether in fact it may not be removed all together. Consideration was given to retaining the Canary Island date palm in its existing location. However, this would require substantial adjustment to the location of the corralling area which in turn would have severely affected the efficiency of the taxi rank on Oaks Drive and entrance to the Spectator Precinct"</i>. Accordingly, appropriate conditions will be applied to ensure the viability of the transplantation and if not provisions for a suitable replacement trees,</p>

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> DA has given insufficient consideration to locating entry plaza/busway further south of existing location. 	<p>Location of entry plaza/busway determined following extensive analysis of all variables including heritage, traffic particularly bus requirements, pedestrian access and safety, urban design etc. Location adopted by Council in RRR DCP. Will create physically and visually attractive, legible entry and address point for RRR.</p>	<p>The proponent's advice regarding the site analysis involved in selecting the new Alison Road entry plaza/busway is considered reasonable and acceptable especially in view of the existing location of the Alison Road entrance to the RRR and the consistency of the proposed location with the RRR DCP.</p>
<p>R. Cresdee, 65 Doncaster Ave, Kensington 2033</p>		
<ul style="list-style-type: none"> Detrimental impact on heritage significant houses on Doncaster Avenue including visual impact of the partial demolition of No. 68, and the loss of living amenity to Nos. 68, 70 and 72. 	<p>Impact on heritage minimised as far as possible. DCP indicates full demolition of these houses, which has been averted. Need to maintain access from Doncaster Avenue/Ascot Street to create efficient transport solution for this major venue consistent with RRR DCP, despite loss of former busway land.</p>	<p>The proposal involves partial demolition of the rear section of No.68 Doncaster Avenue which is a heritage item. This partial demolition is deemed necessary because this rear section intrudes into the proposed Ascot Street vehicular accessway, the configuration of which is necessary in order to provide vehicular access to the RRR site via the existing Ascot Street entry whilst ensuring future access for the former busway site as well. Notwithstanding this, the HIS includes a provision for mitigating the heritage impact of the proposed partial demolition which will be applied as a condition of consent.</p>
<p>G & H Jenkin, 15 The Wool Road, Vincentia 2540 (Owners of 61 Doncaster Avenue)</p>		

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Impact on heritage items on Doncaster Avenue. 	<p>Impact on heritage minimised as far as possible. DCP indicates full demolition of these houses, which has been averted. Need to maintain access from Doncaster Avenue/Ascot Street to create efficient transport solution for this major venue consistent with RRR DCP, despite loss of former busway land.</p>	<p>The proposal involves partial demolition of the rear section of No.68 Doncaster Avenue which is a heritage item. This partial demolition is deemed necessary because this rear section intrudes into the proposed Ascot Street vehicular accessway, the configuration of which is necessary in order to provide vehicular access to the RRR site via the existing Ascot Street entry whilst ensuring future access for the former busway site as well. Notwithstanding this, the HIS includes a provision for mitigating the heritage impact of the proposed partial demolition which will be applied as a condition of consent.</p>
<ul style="list-style-type: none"> Increased traffic and congestion on Doncaster Avenue. 	<p>No increase in crowd capacity on major race days proposed. Aim of works to improve traffic management of RRR site. Traffic management at Ascot Street roundabout will be improved on both major race days and non-race days.</p>	<p>The proponent's Transport Report states that the proposed development retains the existing carnival raceday maximum capacity of the racecourse at 55,000 patrons. Accordingly, there will be no increase in crowd capacity on major race days. The Stage 1 works will improve traffic management of the RRR site, particularly through the use of manned roundabouts at Ascot Street on both major and regular race days.</p>
<p>M. Whitehead, 10 Inglethorpe Ave, Kensington 2033 (On behalf of the Kensington Precinct Committee)</p>		

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Proposal should provide opportunities for reducing flow of stormwater from RRR to surrounding areas and should compensate for infilling of existing ponds. 	<p>Proposal to reduce flow of stormwater from RRR to surrounding areas in accordance with Council requirements. Ponds to be in-filled are ornamental. Stormwater management plan being prepared as per RRR DCP and SOC.</p>	<p>The proponent's response is considered reasonable and acceptable especially considering that the proponent's Statement of Commitments has included a commitment to design and implement the drainage and stormwater system in accordance with a final Stormwater Management Plan that achieves the specific objectives and criteria of the RRR DCP relating to drainage. Furthermore, conditions will be applied to further augment this commitment and ensure stormwater management is designed in accordance with Council's requirement.</p>
<ul style="list-style-type: none"> Transfer of public land in form of public footpath along Alison Road into new busway/parking zone should not be supported. 	<p>No transfer of public land, fence adjustment only. RRR is Crown land.</p>	<p>The proposal does not involve any transfer of public land into the RRR which is itself Crown land.</p>
<ul style="list-style-type: none"> Lack of details regarding horse floats in relation to loading/unloading and parking area and exit points. 	<p>Loading/unloading area at southern end of new Day Stalls shown on plans. Parking area adjacent to loading area. Entry/exit point from High Street described in traffic report.</p>	<p>The proponent has responded adequately to this submission by indicating the loading/unloading area for horse floats and the proposed entry/exit point on High Street.</p>
<ul style="list-style-type: none"> Impact of removal of trees significant trees especially in areas where future development may not happen for many years. 	<p>Tree removal located in areas where development currently proposed or where trees are beyond their useful and healthy life.</p>	<p>An Arboricultural Report (Appendix E of the proponent's Environmental Assessment) has been prepared indicating the trees to be removed due to <i>"poor health, condition, over-maturity and presence of hazardous structural defects"</i>. No objection is raised to the removal of the identified trees given the limited useful life and poor health of the trees as assessed.</p>

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Removal of heritage listed brick and timber fence along Alison Road regrettable. 	<p>Removal of much of existing fence intended to open up site to local area and create new visible, legible entry plaza/busway. High value heritage components as set out in HIS and SECP, retained. New entry design considered consistent with heritage significance of RRR.</p>	<p>The proponent's response to this submission combined with the assessment contained in the Heritage Impact Statement by Godden Mackay Logan, warrant the removal of the existing wall along Alison Road to provide for safer public access to the RRR.</p>
<ul style="list-style-type: none"> Increase in traffic movements in neighbouring residential streets and lack of provisions for monitoring traffic capacity in these streets. 	<p>No increase in crowd capacity on major race days proposed. Aim of works to improve traffic management of RRR site, which should improve conditions in neighbouring streets.</p>	<p>The proponent's Transport Report states that the proposed development retains the existing carnival raceday maximum capacity of the racecourse at 55,000 patrons. Accordingly, there will be no increase in crowd capacity on major race days. The Stage 1 works will improve traffic management of the RRR site, particularly through the use of manned roundabouts at Ascot Street on both major and regular race days.</p>
<ul style="list-style-type: none"> Outside concerts have already been approved. 	<p>Separate consents required for outdoor concerts. Not part of this application.</p>	<p>The RRR currently functions as a venue for entertainment events subject to an appropriate DA being lodged by applicants, and subsequently assessed and determined by Council.</p>
<ul style="list-style-type: none"> Need key contact to liaise with stakeholders and respond to complaints. Consultation should include local resident and school. 	<p>Ongoing consultation mechanism to be established as part of AJC POM, as required by RRR DCP and SOC.</p>	<p>The proponent's advice is considered reasonable and acceptable especially given that a condition will be applied requiring the preparation and submission of a Plan of Management for the RRR including requirements for recording and following-up complaints.</p>
<p>R Stark, JBA Urban Planning Consultants, Level 7, 77 Berry Street, North Sydney (on behalf of owner of former busway land at 66A Doncaster Avenue)</p>		

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Proposed access options at Ascot Street do not provide clearly legible and direct property access to and from Ascot Street for 66A Doncaster Avenue. 	<p>Stage 2 of Ascot Street entry includes clear, legible and direct property access to and from 66A Doncaster Avenue. Current application not able to deal with privately owned land.</p>	<p>The proponent's Transport Report prepared by Masson Wilson Twiney clearly states that <i>"the internal road design has been prepared such that when the former busway site is developed it would be able to connect to the extended Ascot Street in an elongated roundabout..."</i>. Figure 6 in the Transport Report which indicates this arrangement also shows access to and from 66A Doncaster Avenue will be provided in the design of the Ascot Street entry. Notwithstanding this, a condition will be applied that, should agreement be reached between the Australian Jockey Club and the owners of the former busway land regarding the form and arrangement of vehicular access at the proposed Ascot Street and Oaks Drive connection, details of such an alternative access arrangement at this connection be submitted to and approved by Council prior to commencement of any Stage 1 works within the Ascot Street and Oaks Drive road reserves.</p>
<ul style="list-style-type: none"> Proposed access options at Ascot Street not compatible with RRR DCP. 	<p>Access option for Ascot Street consistent with RRR DCP, particularly performance criteria 3.5.a and Maps 7 & 8.</p>	<p>The proposed access option at Ascot Street is consistent with the provision of the RRR DCP, specifically in relation to Performance Criteria 3.5 a and Maps 7 and 8.</p>

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Proposal does not provide sufficient details of proposed racecourse traffic usage of Ascot Street for full range of likely traffic conditions. 	<p>No increase in crowd capacity on major race days proposed. Traffic management at Ascot Street roundabout will be improved on both major race days and non-race days.</p>	<p>The proponent's Transport Report states that the proposed development retains the existing carnival raceday maximum capacity of the racecourse at 55,000 patrons. Accordingly, there will be no increase in crowd capacity on major race days. The Stage 1 works will improve traffic management of the RRR site, particularly through the use of manned roundabouts at Ascot Street on both major and regular race days.</p>
<ul style="list-style-type: none"> Impact of additional racecourse traffic usage on other major road access intersections in the area apart from the Ascot Street/Doncaster Avenue intersection. 	<p>No increase in crowd capacity on major race days proposed. Aim of works to improve traffic management of RRR site, which should improve conditions in neighbouring streets.</p>	<p>The proponent's Transport Report states that the proposed development retains the existing carnival raceday maximum capacity of the racecourse at 55,000 patrons. Accordingly, there will be no increase in crowd capacity on major race days. The Stage 1 works will improve traffic management of the RRR site, particularly through the use of manned roundabouts at Ascot Street on both major and regular race days.</p>
<ul style="list-style-type: none"> Inadequate details regarding closing times and location of proposed RRR gate at Ascot Street. 	<p>Plans indicate bollards and gates. TMAP/AJC POM to specify times and operation.</p>	<p>Details of location and closing times of RRR gates in Ascot Street will be required to be provided in the Traffic Management and Accessibility Plan and Plan of Management by way of relevant conditions.</p>

P. Caruana, 51 Doncaster Ave, Kensington 2033

No objections subject to following issues being addressed:

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Additional traffic at Ascot Street/Doncaster Avenue intersection will be unsafe, disruptive to traffic flow on Doncaster Avenue. 	<p>No increase in crowd capacity on major race days proposed. Traffic management at Ascot Street roundabout will be improved on both major race days and non-race days.</p>	<p>The proponent's Transport Report states that the proposed development retains the existing carnival raceday maximum capacity of the racecourse at 55,000 patrons. Accordingly, there will be no increase in crowd capacity on major race days. The Stage 1 works will improve traffic management of the RRR site, particularly through the use of manned roundabouts at Ascot Street on both major and regular race days.</p>
<ul style="list-style-type: none"> Impact of increased traffic due to redevelopment of former busway land currently owned by Anson. 	<p>Noted.</p>	<p>The proposal is for Stage 1 infrastructure works within the RRR site and does not involve any works within the former busway land which is privately owned.</p>
<ul style="list-style-type: none"> Oaks Drive will create security concerns from unauthorised use and give rise to short-cuts/rat runs. 	<p>To be addressed in TMAP, to ensure safety and security of RRR site.</p>	<p>Required to be addressed in the Traffic Management and Accessibility Plan by way of relevant condition.</p>
<ul style="list-style-type: none"> Anti-social behaviour of future patrons of events including gaining unlawful entry through residents' properties; lack of management plan. 	<p>AJC POM to address anti-social behaviour, as required by RRR DCP and SOC.</p>	<p>Required to be addressed in the Plan of Management by way of relevant condition.</p>
<ul style="list-style-type: none"> Detrimental impact on stormwater drainage especially capability of main stormwater pipe in Doncaster Avenue during major storm events. 	<p>Proposal to reduce flow of stormwater from RRR to surrounding areas in accordance with Council requirements. Stormwater management plan being prepared as per RRR DCP and SOC.</p>	<p>The proponent's Statement of Commitments has included a commitment to design and implement the drainage and stormwater system in accordance with a final Stormwater Management Plan that achieves the specific objectives and criteria of the RRR DCP relating to drainage. Furthermore, conditions will be applied to further augment this commitment and ensure stormwater management is designed in accordance with Council's requirement.</p>

Submissions	Proponent's Response	Council's comments
Paul Chilcott, PO Box 172, St Pauls NSW 2031		
No objections subject to following issues being addressed:		
<ul style="list-style-type: none"> Buses could enter RRR from Doncaster Avenue (from bus roadway) and onto Oaks Avenue so that passengers can directly enter on southern side of Oaks Avenue. 	Extensive analysis has determined that former Oaks Drive best location for taxi drop-off/pick-up. Bus exit on Ascot Street not desirable. Bus access/egress off Alison Road/Darley Road shown to be optimal solution.	The proponent's response is considered reasonable and acceptable especially in view of the rationale for separating bus stop access/egress on Alison Road and taxi drop-of/pick-up on Oaks Drive.
<ul style="list-style-type: none"> Existing right hand turn entry from Alison Road (between Doncaster Avenue and Darley Road) into RRR (designated to become Oaks Avenue) should be removed. 	Right hand turn not used on major race days. TMAP to retain this position. Retention dependent on RTA advice.	A condition will be applied requiring details of measures to prevent right hand turn vehicular movement into Oaks Drive from Alison Road on major race days to be provided in the required Traffic Management and Access Plan.
<ul style="list-style-type: none"> Entrance/exit of Oaks Avenue onto Doncaster Avenue should be upgraded to signalised intersection to improve pedestrian safety and better manage traffic flows on Doncaster Avenue, which is subject to speeding. 	Traffic advice confirms that roundabout optimal solution for best traffic flow and management. Pedestrian paths separated.	The RTA has not required signalisation of the Oaks Avenue intersection with Ascot Street nor the Ascot Street intersection with Doncaster Avenue. Accordingly, the provision of a roundabout as proposed is considered appropriate.
<ul style="list-style-type: none"> Bus plaza parallel to Alison Road should connect with proposed Oaks Avenue roadway to remove need for an additional exit onto Alison Road and associated additional traffic signals on Alison Road. 	Preferable to separate bus and taxi movements. Bus plaza for bus arrivals and departures. Oaks Drive for taxis. Access from existing and retained main gate for all vehicles on non-race days.	The proponent's response is considered reasonable and acceptable especially in view of the rationale for separating bus stop access/egress on Alison Road and taxi drop-of/pick-up on Oaks Drive.
<ul style="list-style-type: none"> Alison Road bus plaza should be for bus departures only. 	Bus plaza for bus arrivals and departures. Oaks Drive for taxis.	The Alison Road new entry/bus plaza will function optimally both as a bus arrival and departure area as proposed under the Stage 1 works.

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Existing masonry walls fronting Alison Road should be retained to enhance pedestrian safety from buses parked on right hand side of bus plaza. 	<p>Existing masonry walls constrict pedestrians to dangerous levels. New entry plaza/busway will allow much more space for pedestrians and bus passengers. Crossing of Alison Road to be controlled at signalised intersections and by kerbside and median fences. Retaining wall/landscaping will separate pedestrians from bus parking.</p>	<p>The proponent's response to this submission combined with the assessment contained in the Heritage Impact Statement by Godden Mackay Logan warrant the removal of the existing wall along Alison Road to provide for safer and enhanced public access to the RRR.</p>
<ul style="list-style-type: none"> Western side of Alison Road between Doncaster Avenue and Cowper Street should be 'no stopping' and this restriction enforced by marshals on race days (and other events). 	<p>Management of buses in this location to be addressed in TMAP.</p>	<p>A condition will be applied requiring details of measures to prevent right hand turn vehicular movement into Oaks Drive from Alison Road on major race days to be provided in the required Traffic Management and Access Plan</p>
<ul style="list-style-type: none"> High Street access road should have an entrance to RRR from Anzac Parade, just south of intersection with Doncaster Avenue to relieve traffic congestion in High Street. In addition, this entrance from Anzac Parade should be used by all 'professional' traffic, such as horse floats. 	<p>New entrance from Anzac Parade not desirable in traffic terms. High Street access intended for all 'professional' traffic as set out in traffic report.</p>	<p>Proponent's advice is considered reasonable and acceptable. RTA has not raised any need for new entrance off Anzac Parade.</p>
<ul style="list-style-type: none"> Propose variable signage on event days at intersection of Alison Road and Anzac Parade (entrance to Randwick City) and maybe also on Darley Road at intersection with Alison Road; should operate to advise private cars and taxis of appropriate entry points. Would provide 'legitimacy' to taxi drivers in dropping off who usually just have to accept directions of their passengers. 	<p>Noted. Signage to be improved as part of upgrade. Details to be prepared in conjunction with AJC POM.</p>	<p>Details of fixed and variable signage will be required to be provided in the Traffic Management and Access Plan and Plan of Management.</p>

Submissions	Proponent's Response	Council's comments
<ul style="list-style-type: none"> Prior to events, local community should be advised so they can plan alternative routes including advertising week prior in local press. 	<p>TMAP, subsection of AJC POM, to include requirements to notify local residents of parking restrictions, as required by RRR DCP and SOC.</p>	<p>Details of information regarding events prior to starting date will be required to be provided in the Traffic Management and Access Plan and Plan of Management.</p>
<ul style="list-style-type: none"> To improve streetscape of main arrival point in Alison Road, overhead utility wiring should be undergrounded; also in Doncaster Avenue. 	<p>Noted.</p>	<p>A condition requiring undergrounding of cables in the proposed Alison Road entry/busway will be applied.</p>
<ul style="list-style-type: none"> During large events, resident only access to local laneways should be implemented, particularly to area east of Alison Road. 	<p>Noted, to be addressed as part of TMAP.</p>	<p>Details of resident access in local streets during event days to be addressed in the required Traffic Management and Access Plan.</p>