



18 June 2021

Mr. Jim Betts
Secretary
Department of Planning, Industry and Environment
Locked Bag 5022,
Parramatta NSW 2124

Attention: Rodger Roppolo

Dear Mr. Betts,

**EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT
NIGHT RACING AT ROYAL RANDWICK RACECOURSE
ROYAL RANDWICK RACECOURSE, RANDWICK**

Thank you for referring the Environmental Impact Statement (EIS) for SSD-8706 'Night Racing at Randwick Racecourse' to Transport for NSW (TfNSW) for review and comment.

TfNSW has reviewed the EIS and provides the following advisory comments for the Department's consideration in **TAB A** and suggested conditions of consent in **TAB B**.

If you have any further inquiries in relation to this development application please contact Narelle Gonzales, Development Assessment Officer, on 0409 541 879 or by email at: development.sydney@transport.nsw.gov.au.

Yours sincerely,

Brendan Pegg
A/Senior Manager Land Use Assessment Eastern
Planning and Programs, Greater Sydney Division

Transport and Pedestrian Management

Comment

The documents prepared to support the development application acknowledge that the proposed night time race meetings would require a detailed Transport and Pedestrian Management Plan. The Plan would be required to manage general traffic and public transport operation and safety of pedestrians and cyclists accessing the subject site as well as in the vicinity of the Racecourse. Details are provided below:

- The arrival of patrons for a weekday night race would coincide with the PM peak period. As indicated in the Transport Impact Assessment, traffic conditions in the area surrounding the site are operating at or near capacity. Therefore a weekday night race meeting would likely have a significant impact on general traffic and race goers accessing the site;
- The proposed night time race meetings would increase demand for bus and light rail services, which would already be servicing for commuters during the PM peak commuters, in addition to the arrival of patrons for a weekday night race;
- Due to the high levels of pedestrian movements, the pedestrian crossings across Alison Road at Darley Road need to be actively managed by the event operator during bump in/out periods; and
- Due to high volumes of patrons accessing the site by point to point transport services, adequate dedicated passenger pickup/drop-off facilities for point to point transport services need to be provided.

Recommendation

It is requested that:

- The applicant undertakes the following as part of the Response to Submissions;
 - Investigate the need delay commencement of race meetings outside of afternoon peak period (eg commence from 7pm) on weekdays to help manage transport demand and to minimise the impact on traffic and transport operations within the Randwick Precinct;
 - Provides details of traffic management measures to ensure no impact on the light rail depot exit and entry of light rail vehicles; and
 - Consult with TfNSW, the Sydney Light Operator and Sydney Trains to confirm that existing and future transport services would be able to accommodate the demand generated by the night time racing.
- The applicant be conditioned to prepare a detailed Transport and Pedestrian Management Plan in consultation with TfNSW and the Sydney Light Rail Operator and submit the final Plan for TfNSW endorsement, prior to the issue of the Construction Certificate.

Event Management

Comment

It is noted that an Event Operational Management Plan has been prepared for night racing as part of the development application. The largest events in the Moore Park precinct are held at night, at both the Sydney Cricket Ground and at the Sydney Football Stadium (which will be reopened in 2022). Additionally there is an established night entertainment precinct at the Entertainment Quarter and Centennial Parklands also operates as a night venue for concerts at times.

It is advised that

- The Event Management Plan should take into consideration other major events being held in the Moore Park precinct, Night race meetings should be co-ordinated with the major event entertainment precinct to minimise impacts on the local transport network and land uses;
- In order to minimise the impact on the road network, event finish times must be scheduled to occur after the PM peak period; and
- While police control is necessary, the number of vehicles that have been shown in the traffic modelling undertaken will not be able to be managed by police alone and thorough investigation should be conducted into self-regulating management devices that do not require excessive personnel management.

Recommendation

It is requested that the applicant be conditioned to update the Event Operational Management Plan in consultation with TfNSW, the Sydney Light Rail Operator and the relevant stakeholders and submit the final Plan for TfNSW endorsement, prior to the issue of the Construction Certificate.

Travel Demand Strategy and Green Travel Plan

Comment

Section 7.6.6 of the Transport Impact Assessment prepared to support the development application states the following:

“Measures to reduce private vehicle trip generations include:

- Establish event-specific sustainable travel plans in the lead up to events;*
- Regularly update the website and wayfinding to incorporate changes in local travel infrastructure and timetables, and seek opportunities to promote them’*

It is advised that TfNSW supports the applicant's proposal to encourage the use of non-car transport options and requests that the applicant prepares a Travel Demand Management Strategy and Green Travel Plan for the proposed development in consultation with TfNSW and the relevant stakeholders.

Recommendation

It is requested that the applicant be conditioned to prepare Travel Demand Management Strategy and Green Travel Plan, in consultation with TfNSW and the relevant stakeholders, with the intent of increasing the use of public and active transport modes for the development and submit a copy of the final plan for TfNSW endorsement, prior to the issue of the Occupation Certificate.

Wayfinding and Signage Strategy

Comment

The suitability of the pedestrian network to accommodate the forecast pedestrian demands, particularly at night needs to be assessed. Section 7.8 of the Transport Impact Assessment states the following:

“Measures to improve pedestrian accessibility and reduce impacts include:

- Maintain a comprehensive site wayfinding approach, including maps, signage, and staff guidance”*

Wayfinding and Signage Strategy needs to be prepared to improve wayfinding and signage to the surrounding local areas and between public transport nodes and the development site, including lighting.

Recommendation

It is requested that the applicant be conditioned to prepare a Wayfinding and Signage Strategy in consultation with TfNSW and the Sydney Light Rail Operator to improve wayfinding and signage to the surrounding local areas and between public transport nodes and the development site and submit a copy of the final Strategy to TfNSW, prior to the issue of the Construction Certificate.

Transport and Pedestrian Safety

Comment

The adequacy of the proposed measures such as wayfinding and signage, lighting, etc. need to be assessed for key routes to the surrounding local areas and between public transport nodes and the development site for night time conditions. Access to the Royal Randwick Light Rail stop is on the northern side of Alison Road for patrons departing night racing should also be addressed.

Recommendation

It is requested that the applicant be conditioned to:

- Prepare a Transport and Pedestrian Safety Plan in consultation with TfNSW and the Sydney Light Rail Operator and submit a copy of this Plan for TfNSW endorsement, prior to the issue of the Construction Certificate; and
- Undertake a Road Safety Audits for traffic, transport and pedestrian facilities / arrangements for the night time race meetings within and in the vicinity of the Randwick Racecourse, in accordance with *Austroads Guide to Road Safety Part 6: Managing Road Safety Audits* and *Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits*. Based on the results of the road safety audit, the applicant shall implement safety measures as required. The audit shall be undertaken prior to the commencement of night time race meetings and three (3) months after the commencement of night time race meetings.

Construction Pedestrian and Traffic Management

Comment

It is advised that any construction activities associated with the night time racing should not have impact on general traffic and public transport operation as well as pedestrians and cyclists safety in the vicinity of the Randwick Racecourse.

Recommendation

It is requested that the applicant be conditioned to prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW and the Sydney Light Rail Operator and submit a copy of the final plan for TfNSW endorsement.

Draft Conditions of Consent

Draft Conditions of Consent are included in **TAB B**. It is advised that the final suggested Conditions of Consent be provided as part of the comments on the applicant's response to submissions.

TAB B– Draft Suggested Conditions

Transport and Pedestrian Management

Prior to the issue of the Construction Certificate, the applicant shall prepare a detailed Transport and Pedestrian Management Plan in consultation with TfNSW and the Sydney Light Rail Operator and submit the final Plan for TfNSW endorsement. The Transport and Pedestrian Management Plan shall include the following sub-plans:

- Operational Traffic Management Plan;
- Public Transport Management Plan;
- Pedestrian Management Plan; and
- Point to Point Management Plan.

Event Management

Prior to the issue of the Construction Certificate, the applicant shall update the Event Operational Management Plan in consultation with Transport for NSW and the Sydney Light Rail Operator and submit the final Plan for TfNSW endorsement.

Travel Demand Management

Prior to the issue of the Occupation Certificate, the applicant shall prepare a Travel Demand Management Strategy and Green Travel Plan in consultation TfNSW and other relevant stakeholders. The applicant shall submit a copy of the final plan via development.sco@transport.nsw.gov.au for TfNSW, prior to the issue of an occupation certificate.

The GTP must be implemented and updated annually to ensure sustainable transport outcomes and achieve the overall strategic planning objectives in Future Transport 2056.

The plan shall be reviewed and updated annually in consultation with the aforementioned stakeholders and provide an Implementation Strategy that commits to specific management actions, including operational procedures to be implemented along with timeframes.

The plan (as reviewed and updated annually) shall be implemented by the applicant for the life of the development.

Wayfinding and Signage Strategy

The applicant shall prepare a Wayfinding and Signage Strategy in consultation with TfNSW and the Sydney Light Rail Operator improve wayfinding and signage to the surrounding local areas and between public transport nodes and the development site and submit a copy of the final Strategy to TfNSW, prior to the issue of the Construction Certificate.

Transport and Pedestrian Safety

Prior to the issue of the Construction Certificate, the applicant shall prepare a Transport and Pedestrian Safety Plan in consultation with TfNSW and the Sydney Light Rail Operator and submit a copy of this Plan for TfNSW endorsement. The Safety Plan should include a detailed pedestrian route assessment of key routes to the surrounding local areas and between public transport nodes and the development site, including night time conditions.

The applicant shall undertake a Road Safety Audits for traffic, transport and pedestrian facilities / arrangements for the night time race meetings within and in the vicinity of the Randwick Racecourse, in accordance with *Austroads Guide to Road Safety Part 6: Managing Road Safety Audits* and *Austroads Guide to Road Safety Part 6A: Implementing Road Safety Audits* by an independent TfNSW accredited road safety auditor. Based on the results of the road safety audit, the applicant shall implement safety measures as required. The audits shall be undertaken prior to the commencement of night time race meetings and three (3) months after the commencement of night time race meetings.

Construction Pedestrian and Traffic Management

Prior to the issue of any construction certificate or any preparatory, demolition or excavation works, whichever is the earlier, the applicant shall prepare a Construction Pedestrian and Traffic Management Plan (CPTMP) in consultation with TfNSW and the Sydney Light Rail Operator. The applicant shall submit a copy of the final plan to development.sco@transport.nsw.gov.au for TfNSW endorsement.