



Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

21 March 2022

Ref No: F2021/00252

Attention: Rodger Roppolo

Application No: SSD-8706

Dear Rodger,

Re: Randwick City Council Response to Submissions on the State Significant Development SSD-8706 – Night Racing at Royal Randwick Racecourse (SSD-8706)

Thank you for the opportunity to comment on the Response to Submissions (RtS) report and supporting documentation prepared on behalf of the Australia Turf Club (ATC) for the night racing proposal at the Royal Randwick Racecourse. Council officers have reviewed the material and provide the following advice and condition recommendations.

Outstanding issues to be addressed

The following issues have not been adequately addressed by the RtS documentation and required additional information and clarification, prior to the determination of the proposal.

Traffic and parking

Council raises significant concerns with regard to the SIDRA traffic modelling undertaken to date and the traffic impacts of the proposal, including congestion and queue lengths at major intersections and the road network surrounding the site. Particular concern is raised regarding the following intersections:

- Alison Road and Doncaster Avenue
- Anzac Parade and Doncaster Avenue
- Doncaster Avenue and Ascot Street and
- Alison Road and Darley Road.

The SIDRA modelling for the affected road network carried out by PTC (the Applicant's traffic consultant) utilised 2017 traffic data with an applied 1% increase for each year. The Independent Transport report (JMT Consulting) prepared for the Department of Planning and Environment suggested further verification of the suitability of the 2017 traffic counts given that these were collected during extensive light rail construction works. The Response to Submission Report prepared by Urbis notes that '*Council accepted that no further traffic modelling is required as new modelling is unlikely to provide any new information than already understood regarding existing or projected traffic flows.*' Council advises that this is not the case and does not accept the approach that 2017 data plus a 1% annual increase is suitable. Following discussions between the Applicant and Council in November 2021, Council was under the impression that the network

model would be updated for the entire area for non-race day events, and that the Applicants traffic consultants were liaising with TfNSW on their requirements for this model.

It is Council's recommendation the SIDRA modelling be carried out as recommended by the Department's independent traffic consultant JMT Consulting i.e. sourcing the SCATS detector counts for 2021 from TfNSW (or more recent if available). This approach would provide a realistic measure of the current traffic congestion and queue lengths at impacted intersections, particularly as due to Covid 19, more people are avoiding public transport and using private vehicles to commute. This SIDRA modelling should be undertaken for existing and future traffic (expected traffic generation from night racing events) to determine the current and future traffic impacts, congestion, and queue lengths.

Notwithstanding the above, the traffic congestion impacts (delays/queue lengths) that have been identified by the Applicants traffic consultant forecast a substantial increase in the lead up to the proposed night racing events at key intersections. This is primarily due to the traffic arrival for night racing coinciding with afternoon commuter traffic between 5pm to 6pm. In this regard, the queue length is worse for Ascot Street, whereby average delays are expected between 10-50 mins with a queue length from 7m to 1.5km. This will result in traffic flow impacts to nearby arterial roads and motorways including South Darling Street and the Eastern Distributor. It should also be noted that under scenario 1 where taxi and Uber vehicles enter via Ascot Street, vehicle delays are forecast to extend into multiple hours with queue lengths of nearly 4km. A comparison of existing and forecast queue lengths for key intersections is provided below.

Predicted Traffic queue lengths at key intersections (JMT Consultants)

Intersection	Vehicle approach	Existing queue length	Forecast queue length
Alison Road & Doncaster Avenue	Doncaster Ave (South)	442m	922m
Alison Road & Darley Road	Alison Rd (East)	336m	650m
Alison Road & Gate 1 entry	Alison Rd (West)	5m	168m
Doncaster Avenue & Ascot Street	Ascot St (West)	7m	1,578m (1.578km)
Doncaster Avenue & Anzac Parade	Doncaster Ave (South)	736m	2,325m (2.325km)
	Doncaster Ave (North)	275m	1,462m (1.462km)
	Anzac Pde (West)	304m	795m

Council accepts that the infield car park has the capacity to accommodate the parking requirements for the night racing proposal, however, it is unlikely that all patrons driving to night racing events will choose to park in the infield park. Rather, patrons are more likely to circulate in the surrounding residential streets to avoid car parking fees and to reduce the risk of getting caught in queues/delays at the conclusion of the night racing events.

Council's residential parking scheme currently applies to the surrounding street network in a limited capacity, with a 2hr parking time limit until 6pm. As night races are proposed to commence at 6pm, the residential parking scheme will not act as a deterrent to reduce parking in the surrounding streets. This will cause significant impacts to local residents returning home in the evening, as the race patrons will occupy most of the available parking spaces in this residential area and can avoid any enforcement by Council officers or the Police.

Council is not satisfied that the RtS documentation and Traffic and Transport Management plan address the traffic congestion and parking issues raised above. The following additional information is therefore required to be submitted prior to the determination of the proposal:

- SIDRA Modelling should be reanalysed for 2021 (or more recent) traffic data sourced from TFNSW (SCATS detector count). This modelling should include existing and future traffic.

In addition, the following amendments and mitigation measures should be agreed by the Applicant, prior to the determination of the proposal:

- Further details of the implementation of proposed integrated ticketing with public transport (to be included in the proposed Transport Management Plan).
- Infield parking should be provided only to patrons who prebook to minimise parking in residential streets.
- Before and after parking surveys should be undertaken for the surrounding local street network (appropriate streets to be identified by Council officers). The Applicant should be liable for the cost involved to Council to amend the residential parking scheme, including (but not limited to) the extension of the scheme from 6pm to 9pm or a user pay system.

Visual Impact on heritage items and conservation area

The number, distribution and bulk of the proposed lighting columns will have a high degree of visibility from surrounding streets, from heritage items internal and external to the site and from the adjacent Randwick Racecourse heritage conservation area. Additional information was requested by Council to assess the impact.

In relation to discrepancies in drawings, the Site Plan submitted as part of the RtS documentation indicates the following:

- 40m high light columns behind the Members Stand and attached to the Winx Stand
- 30-30.5m light columns to the east of the Members Stand and to the south of the Winx Stand
- 27.4m high light columns encircling the track and adjacent to the 1200m chute
- 18-22m high columns adjacent to the 1400m chute
- 24.4m high light columns (one only) on the track in front of the QEII Stand
- Some of the light poles will have two tiers of lights, one at the top and another further down the pole.

Once again, the Site Plan does not indicate significant trees on the site, including a number within the Spectator Precinct in close proximity to light columns. The Site Plan key also indicates taller poles within the Spectator Precinct (mostly behind the Members Stand and the Theatre of the Horse) and lower poles within the Spectator Precinct (adjacent to the Members carpark and the taxi stand). It is unclear whether these taller and lower poles are new or existing. Similarly, no information is provided on the height of these poles. The Light Pole Elevations drawing does indicate some poles which are 18.75m high and some which are 21.43m high. It is assumed that the taller and lower poles within the Spectator Precinct are either 18m or 21m high. It is noted however that the previous submission noted pole mounted LED lighting up to 10m in height within the Spectator Precinct.

The RtS documentation answers some previous questions raised by Council, however also raising a number of new questions. The documentation should be clarified accordingly and this should be reflected in any conditions of consent.

Recommended condition of consent

In the event that the proposal is recommend for approval in its current form, the following conditions of consent should be included.

Operational management

1. Infield parking should be provided only to patrons who prebook to minimise parking in residential streets.

2. Suitable conditions should be imposed to give effect to the response to submissions summary contained at Tables 7 and 10, of the *Royal Randwick Racecourse Night Racing - Response to Submissions* prepared by Urbis, dated 18 February 2022 and the *Australian Turf Club Event Operational Management Plan – Royal Randwick Racecourse – Night Racing*, Revised Draft v2 SSD-8706, dated 30 November 2021.

NOTE: the Event Operation Management should be updated to reflect condition 1 above prior to the issue of a construction certificate for the development.

3. Council recommends that an on-going stakeholder forum is established that is capable of reviewing and, if required, implementing any necessary changes to, or the provision of additional measures to mitigate issues that may arise as the night program is delivered. At a minimum this forum should include the relevant event management representatives from the ATC, their security provider and their acoustical and transport consultants, relevant Council staff, NSW Police, Transport for NSW and representatives and representatives from the community. Suitable conditions should be included with regard to the establishment and operation of the stakeholder forum.
4. Council recommends the imposition of appropriate conditions to prompt for better communication with the surrounding neighbours at least 1 week prior to each event (i.e. letter drop with relevant event details including complaint hotline).

Parking

5. Before and after parking surveys should be undertaken for the surrounding local street network (appropriate streets to be identified by Council officers). The Applicant should be liable for the cost involved to Council to amend the residential parking scheme, including (but not limited to) the extension of the scheme from 6pm to 9pm or a user pay system. A written undertaking from the Applicant agreeing to the above should be provided prior to the issue of a construction certificate.

Lighting

6. Conditions should be imposed that mandate the following light spill and glare mitigation measures as provided for in the *Randwick Racecourse Night Lighting - Lighting Responses To SSDA Submission*, prepared by IGS, dated 25 November 2021, including baffles, visors & shields fitted to luminaires, dimming between races, event notification and light level sensor/monitoring system. Conditions should ensure that analysis and testing be undertaken by a suitably qualified lighting consultant post installation of the poles verifying that light glare will not create adverse impacts on nearby residential properties.
7. All lighting generators are to be located within the infield and documentation with the dimensions and details of the generators and associated acoustic screening that demonstrate compliance with the relevant noise criteria are to be submitted to and approved by Council prior to issue of a construction certificate. A suitable condition should be included in this this regard.

Noise

8. Suitable conditions of consent should be imposed that give effect to the recommendation contained in the *Royal Randwick Racecourse - Night Racing – Peer Review of Noise Assessment*, prepared by RWDI Australia, dated 29 June 2021.

Ecology

9. Council supports the proposed Grey-headed Flying-fox Ecological Monitoring Plan to monitor any potential adverse impacts on the Grey-headed Flying-fox colony from the lighting associated with the night-time racing events and to inform the Adaptive

Management Strategy. Conditions of consent should be included that require the monitoring plan be prepared and implemented by a qualified Ecologist and that monitoring be in place to establish baseline monitoring of the Flying-fox camp fly-out prior to any Night Racing events taking place.

Heritage and archaeology

10. Recommended conditions of consent are included in Attachment A with regard to built heritage, Aboriginal archaeology and European archaeology.

I trust that Council's comments will be taken into consideration for this proposal. Should you have any questions regarding the submission, please contact Natasha Ridler, Coordinator Strategic Planning, on 9093 6961.

Yours sincerely,



Stella Agagiotis

Manager Strategic Planning

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ATTACHMENT A – HERITAGE AND ARCHAEOLOGY CONDITIONS

Built heritage

Site stability, excavation and construction work – Members Stand

Prior to commencement, a report from a suitably qualified and experienced Heritage Structural Engineer must be prepared, including the following:

- Geotechnical details which confirm the suitability of the site for the development and relevant design and construction requirements to be implemented to ensure the stability and adequacy of the lighting columns and the adjoining Members Stand.
- Details of the proposed methods of excavation and support for the adjoining land (including any public place) and the adjoining Members Stand.
- Details to demonstrate that the proposed methods of excavation, support and construction are suitable for the site and should not result in any damage to the adjoining premises, buildings or any public place, as a result of the works and any associated vibration.
- Details of appropriate measures, monitoring regime/s and controls to be implemented during excavation and construction work, to maintain the stability and significance of the adjoining Members Stand.
- The information shall include; details of suitable specific plant and equipment; inspection regimes; development and implementation of appropriate vibration limits; adoption of relevant standards and criteria; monitoring equipment and vibration control strategies.

European Archaeology

Archaeological Finds Procedure

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop. The find must not be moved 'out of the way' without assessment, and the area should be cordoned off with signage indicating the area as a 'no-go' zone.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken.
5. Reporting, including a Section 146 Letter, may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

Human Remains Procedure

In the unlikely event that human remains are uncovered during the proposed works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop, and the area should be cordoned off with signage indicating the area as a 'no-go' zone.

2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.

Aboriginal Archaeology

- The Addendum Aboriginal Objects Due Diligence Letter should be kept as evidence of the Due Diligence Process having been applied to the subject area.
- No further archaeological assessment of the subject area is required in accordance with the Due Diligence Code.
- All staff, contractors and others involved in construction and maintenance related activities are to be made aware of the statutory legislation protecting sites and places of significance through an archaeological induction, to be prepared in consultation with the La Perouse Local Aboriginal Land Council (LPLALC).
- Archaeological chance finds and human remains procedures should be implemented and followed, as described in the *Archaeological Finds Procedure* and *Human Remains Procedure* conditions.