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Mr Ben Lusher
Department of Planning and Environment
320 Pitt Street
Sydney NSW 2000

Dear Ben,

PROJECT APPROVAL MP_10_0098 – PROPOSED MODIFICATION NO.2 REQUEST FOR SEARS – REVISED STABLES LAYOUT AND NEW RANDWICK EQUINE CENTRE, ROYAL RANDWICK RACECOURSE

1. INTRODUCTION

This letter has been prepared on behalf of Australian Turf Club (ATC), formerly the Australian Jockey Club, (the Proponent). The ATC is proposing to amend Project Approval MP_10_0098 through the proposed reconfiguration to the layout of the stables development and the introduction of a related activity being the Randwick Equine Centre (REC).

We request the Secretary to issue Environmental Assessment Requirements (SEARs) associated with this proposed modification. To assist with the Department's understanding of the proposal, the following information is provided:

- Identification of the site and locality
- Description of the proposed modifications
- Identification of key issues for consideration
- Conceptual Architectural Plans

This request also outlines the relevant statutory requirements to modify a project approved under the former Part 3A of the *Environmental Planning and Assessment Act, 1979* (The Act), and provides justification for the proposed modification.

An indicative concept plan prepared by Populous (Appendix A) is attached to provide a general understanding of the proposal. This plan will be refined during the preparation of the modification request and a more detailed assessment of the key issues will be undertaken in accordance with the SEARs.

2. SITE AND CONTEXT

The Stables Precinct comprises the eastern portion of the Royal Randwick Racecourse site, which is situated in Sydney's eastern suburbs, to the north of the University of New South Wales (UNSW) main campus, and to the south of Centennial Park.

The Stables Precinct has a principle frontage to Wansey Road to the east, from which vehicle access is obtained, and a secondary street frontage to Alison Road to the north-east. The site is legally described as Lot 2009 in Deposited Plan 1169042. An aerial of the Stables Precinct indicating the extent of the site for this proposal is shown in Figure 1 below.

Figure 1 – The Stables Precinct



Source: Populous

The Stables Precinct situated at the corner of Alison Road and Wansey Road has vehicle access from Wansey Road. The Wansey Road frontage is densely vegetated by a mix of large mature trees including Moreton Bay Fig Trees and Plane Trees providing dense foliage. The topography of the site slopes away from Wansey Road, creating visual and acoustic separation between the Stables Precinct and the residential development running along the eastern side of Wansey Road.

The area immediately surrounding the Stables Precinct consists of:

- To the north-west – the Royal Randwick Racecourse racing track, and Spectator Precinct, and further north Centennial Park.
- To the east - residential area consisting of a mix of one and two storey single dwellings and three storey residential flat buildings.
- To the south – the 'Steeple Hill Precinct' which currently comprises older-style stable and training facilities (which are to be replaced by the proposed stable facilities), and further to the south of High Street the University of New South Wales (UNSW) and the Prince of Wales Hospital.
- To the south-west – the 'High Street Precinct' which is occupied by older-style stable and training facilities (to be replaced by the proposed new stables), and further west Anzac Parade which is a mixed use corridor for public transport and local strip-shopping.

3. BACKGROUND

3.1. APPROVALS

On 7 February 2011, the Planning Assessment Commission on behalf of the Minister for Planning approved Major Project (MP 10_0098) for a Project Application pertaining to the redevelopment of the Stables Precinct at the Royal Randwick Racecourse.

The development approved under MP 10_0098 is summarised as follows:

- Six two-storey stable buildings, each housing 100 horses, sand rolls, wash-bays and accommodation for 10 strappers / stable-hands.
- 12 two-storey mechanical horse walkers (24 machines in total).
- Tie-up Stalls for 50 visiting horses for Barrier Trials.
- Pony Enclosure for 20 to 25 ponies.
- Exercising facilities including a 'Bull Ring', Parade Rings, and Equine Pool.
- Parking for some 110 vehicles, comprising 80 permanent and 30 over-flow parking spaces.
- Modifications to the existing vehicle access from Wansey Road, relocating it further north of the existing Wansey Road access.

There has been one Modification of the original Stables Precinct at the Royal Randwick Racecourse, which has been approved pursuant to Section 75W of the Act, on 19 January 2016. The modification did not change the overall proposed development as described above. However, the modification introduced a construction staging program.

In terms of progress, works identified in Stage 1 of the construction staging program in MP 10_0098 MOD 1 have been completed.

3.2. CBD AND SOUTH EAST LIGHT RAIL (CESLR) PROJECT

A separate but related project approval relates to the CESLR project, which is located partly within and along the subject site's frontage to Wansey Road and Alison Road.

Infrastructure Approval SSI-6042 was issued in June 2014 for the construction and operation of a light rail service from Circular Quay to Kingsford and Randwick via Surry Hills and Moore Park. The project is now in advanced stages of construction.

The potential for the light rail encroachment into the subject site was considered in the previous modification to MP 10_0098. However, Transport for New South Wales (TfNSW) recently issued the final light rail alignment for Wansey Road and Alison Road, providing certainty on the portion of the subject land to be subsumed into or duplicated in the SSI-6042 approval.

The light rail alignment along Wansey Road requires the relocation of Gate 10 and as such, this is being undertaken to provide vehicle access and egress to the Stables Precinct. Road works along Wansey Road and the intersection at Alison Road would also be undertaken to facilitate vehicle movement into and out of Gate 10 and travel of light rail vehicles between Wansey Road and Alison Road. All of these works including the relocation of Gate 10 are being delivered by TfNSW as part of the SSI approval.

4. PROPOSED MODIFICATIONS

The proposed modifications are shown in the Indicative Concept Plans in Appendix A (prepared by Populous Architects) for the Royal Randwick Racecourse stable facility development.

The proposed modifications will comprise the following:

- Reconfigured layout of the Six two-storey stable buildings, each housing 100 horses, sand rolls, wash-bays and accommodation for 10 strappers / stable-hands.
- Three new single storey outbuildings to serve the precinct (admin building, shaving shed & farriers hut.
- 15 single storey mechanical horse walkers.
- Tie-up Stalls for 20 visiting horses for Barrier Trials.
- Pony Enclosure for 4 to 8 ponies.
- Parking for approximately 110 vehicles, comprising 80 permanent and 30 over-flow parking spaces.
- Modifications to the existing vehicle access from Wansey Road, relocating it further north of the existing Wansey Road access.
- Reconfigured internal road layout.
- Introduction of a new equine veterinary practice, referred to as Randwick Equine Centre (REC).

The future modification will not seek staged development consent under Division 2A, Part 4 of the Act. However, the development will implement an indicative staged construction of the project as follows:

- Stage 1 – Randwick Equine Centre.
- Stage 2 – 400 stables and associated buildings.
- Stage 3 – 200 stables (bringing the total number of stables to 600) and 5 mechanical horse walkers.

4.1. RANDWICK EQUINE CENTRE

Randwick Equine Centre will be an equine veterinary centre, providing medical support to all types of horses, but predominantly those associated with the racing industry. It has a particularly strong connection to the operation of the three major training centres in Sydney (Randwick, Rosehill and Warwick Farm).

The proposed centre will comprise of:

- 30 Stables and trot paths servicing the REC.
- Surgery and recovery rooms.
- MRI Bone Scanning room and isolation stalls.
- Veterinary consultant rooms and work areas.
- General office and ancillary rooms.
- Car parking and loading area.
- Hours of operation
 - Reception – 8am to 5.30pm Mon to Fri, 8am to 11am Saturday
 - Hospital – 7.30am to 6.30pm Mon to Fri (2 - 4 staff members on weekends)
- Total staff count at the REC = 26 employees

Refer to Appendix A for Indicative Concept Plans, and Section 6 of this letter for key environmental considerations.

4.2. JUSTIFICATION FOR PROPOSED MODIFICATIONS

Stage 1 – Randwick Equine Centre

The changing needs of the proponent and the requirement to vacate the site of the existing Randwick Equine Centre at the Inglis Stables in Randwick by early 2019, means the facility is being sought to be consolidated into the Royal Randwick Racecourse Stables Precinct. This consolidation provides significant efficiencies and capitalises on the significant inter-relationship between the racecourse and REC.

Stage 2 - 400 stables and associated works

The requirement to relocate Gate 10 due to CESLR works has prompted a redesign of the Stables Precinct. As such, the proposed modification seeks to reconfigure the internal access roads to ensure safe vehicular movement and subsequently, the layout of the stables and associated buildings. The staged delivery of stables and associated works provides the proponent the flexibility to respond to changing stable capacity requirements.

Stage 3 – 200 stables and 5 mechanical horse walkers

There are currently 200 existing stables located in a separate part of Royal Randwick Racecourse, which are reasonably modern and therefore suitable for ongoing operation. The existing 200 stables and the 400 stables to be delivered as part of Stage 2 works, will fulfil the proponent's current requirement for 600 stables in total. The proposed 200 stables within Stage 3 provides a succession plan for more modern stabling facilities in the future, once the existing stables are decommissioned.

Figure 2 – Indicative Layout Plan



Source: Populous

4.3. CAPITAL INVESTMENT VALUE

The Capital Investment Value report at Appendix B provides an accurate estimate of the cost of carrying out the proposal. According to this report, the CIV for the site is approximately \$55 million. The original CIV for the redevelopment was \$37.5million.

5. STATUTORY PLANNING FRAMEWORK

5.1. MODIFICATIONS OF PART 3A APPROVALS

Schedule 6A of the Act came into effect on 1 October 2011 to provide for repealed provisions of Part 3A of the Act to continue to apply to certain projects that were approved or undetermined under Part 3A. These are all now known as “Transitional Part 3A Projects”.

In accordance with Clause 3 of Schedule 6A of the Act, all of the provisions of Part 3A as in force immediately before its repeal continue to apply to Transitional Part 3A Projects. The provisions of Section 75W of Part 3A prior to its repeal and as modified by Schedule 6A, state that “the Proponent may request the Minister to modify the Minister’s approval of a project.”

Under s.75W(1) ‘modification of approval’ means “changing the terms of a Minister’s approval, including:

- (a) revoking or varying a condition of the approval or imposing an additional condition of the approval, and
- (b) changing the terms of any determination made by the Minister under Division 3 in connection with the approval.

The approval MP10_0098 is a Transitional Part 3A Project to which Schedule 6A of the Act applies. The proposed change to the layout of the redevelopment and introduction of the REC, and consequential amendments to the conditions of approval can therefore be considered under s.75W of Part 3A of the Act.

5.2. ENVIRONMENTAL ASSESSMENT REQUIREMENTS

Section 75(3) of the EP&A Act provides scope for the Secretary of the Department to issue Environmental Assessment Requirements (SEARs) in relation to a request to modify the terms of the Minister’s approval.

The modification requested includes the addition of a new building and a new but related use. Given the potential for additional environment assessment considerations we request new SEARs are issued as part of this application.

5.3. CONSISTENCY WITH CURRENT APPROVAL

The modifications are considered to be consistent with the development approved under MP 10_0098, as identified below:

- **Consistent site footprint:** The proposed modifications will be retained fully within the approved development footprint in MP 10_0098.
- **Construction of 600 stables and associated structures:** The stables, associated structures and the general land use will remain generally consistent with approved MP 10_0098.
- **Access:** Vehicular access will be retained from Wansey Road. However, Gate 10 will be relocated in response to the CESLR.
- **Vegetation:** Tree removal is consistent with MP 10_0098.
- **Additional building form/ use:** The introduction of the REC is considered to be substantially aligned with the approved stables development, for the reasons identified in Section 5.3.1.

5.3.1. Consistency of Project Approval

The introduction of the REC is considered substantially consistent, and therefore acceptable to be included as a modification under section 75W of the Act, for the following reasons:

- There is a strong nexus between the approved stables and the proposed REC, being that the two uses are complementary and have a high level of mutual business and connectivity.
- The introduction of the REC does not change the overall use of the site, being for equine related activities.
- The hours of operation of the REC are aligned with other activities of the racecourse.
- The REC will not provide any cumulative environmental impacts to the approved development.

6. KEY ISSUES FOR CONSIDERATION

The key issues arising from review of the site context and a preliminary assessment of the indicative concept plans are listed below as follows:

- Built form
- Traffic, parking and access
- Noise
- Residential amenity impacts
- New employment
- Contamination
- Tree retention/removal
- Construction and operational impacts
- Consultation

The following sections of the letter expand on some of the potential impacts identified above, and the likely measures to avoid, mitigate and/or manage these impacts. This information has been prepared to assist the DPE to identify the environmental assessment requirements, including the detailed studies and investigations required to support the development modification.

6.1. BUILT FORM

The EIS supporting the modification will assess the height, bulk and scale of the proposed development within the context of surrounding built and natural environment. Consideration will be taken regarding the architectural design solutions and treatment measures to mitigate the visual impact on surrounding land uses.

6.2. TRAFFIC, PARKING AND ACCESS

Appropriate studies will be undertaken to identify any potential changes to traffic and access to the site – responding to the final alignment of CESLR, the changing layout of the stables development and any additional traffic the proposed REC may generate. In addition, an assessment of onsite parking provisions, taking into account reduced number of parking spaces that are likely to be required.

6.3. NOISE

Appropriate studies will be undertaken to assess noise generation and any changes in acoustic impact potentially caused by the REC.

6.4. RESIDENTIAL AMENITY IMPACTS

Relevant impacts on surrounding residential properties will be assessed, including view sharing, traffic, bulk, scale and construction and operational factors.

6.5. NEW EMPLOYMENT

The proposed REC will provide the opportunity for an additional 26 new jobs on the site, associated with the ongoing operation of the REC and medical care to horses.

6.6. TREE RETENTION/REMOVAL

The proposal does not include the removal of any additional trees beyond what was approved as part of MP 10_0098. Consideration will be taken into the interface of the REC and the significant trees fronting Wansey Road, to mitigate any potential impacts.

6.7. CONSTRUCTION AND OPERATIONAL IMPACTS

The EIS will address and consider the following construction and operation impacts:

- Acoustics and vibration,
- Soil, groundwater, and geotechnical characteristics of the site and environs,
- Stormwater,
- Servicing and infrastructure including construction access/traffic,
- Operation and management issues, and
- Construction staging.

7. CONSULTATION

A meeting was held with DPE on 16 May 2017, to discuss the proposed modification to MP 10_0098. Comments during this meeting informed the preparation of this letter. The applicant will seek consultation with Randwick City Council to notify of proposed changes to the development.

Further consultation with broader stakeholders will be carried out according to requirements set out in the SEARs.



8. CONCLUSION

This request has provided an outline of the intended modification to MP 10_0098 under the Section 75W pathway indicative concept plan for the site and identified the key environmental issues to assist the DPE in the preparation of the SEARs.

We look forward to receiving SEARs and if required would welcome the opportunity to meet with the Department (and other key stakeholders) to provide a detailed briefing regarding the project.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "RB", with a stylized flourish at the end.

Richard Barry
Consultant

Appendix A – Indicative Concept Plans – prepared by Populous

Appendix B – Capital Investment Value – prepared by AW Edwards