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30 March 2022

Rodger Roppolo
Senior Planning Officer, Key Sites Assessment
Department of Planning and Environment
via email

Dear Rodger,

NIGHT RACING AT ROYAL RANDWICK RACECOURSE - SSD-8706: RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION, MARCH 2022

We write on behalf of the Australian Turf Club (**the Applicant**) in response to the Department of Planning and Environment's (**DPE**) request for additional information on State Significant Development Application SSD-8706, dated 8 March 2022. In particular, the request for additional information (**RFI**) refers to issues raised by the EESG on the following matters:

1. Submission of a BDAR Waiver request.
2. Addressing flood impacts for the proposal.

Please accept the following response to the requested information.

1. BDAR WAIVER

Please refer to the attached BDAR Waiver request.

We understand that satisfactory information has been provided so far in support of SSD-8706 in relation to biodiversity assessment to warrant the BDAR waiver. We recommend that the following reports submitted for SSD-8706 are reviewed concurrently with the BDAR Waiver request:

- *Visual and landscape assessment*, prepared by Sturt Noble Architects.
- *Arboricultural Impact Assessment*, prepared by Bradshaw Tree Services.
- *Grey headed Flying Fox Biodiversity Impact Assessment*, prepared by Cumberland Ecology.

2. FLOODING

EES requested a response to the following matters:

The spectator precinct of the racecourse appears to become a high flood island during extreme flood events, with flooding in both access corridors of Alison Road and Members Drive highly hazardous. Similarly, surrounding roads of Ascot Street, Doncaster Avenue and Anzac Parade also experience high hazard flooding. Therefore, consideration should be given to flood emergency management. The proposed change to allow night racing introduces additional factors for consideration in emergency management.

Subsequent to the receipt of the RFI, the Applicant has sought further clarification from EESG on the specific details required to satisfactorily address concerns of flood impacts for the proposal. The following is a summary of clarification provided by EESG via email on 22 March 2022:

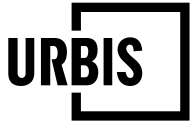
- Consideration be given to the Local Flood Plan during the preparation of a site specific emergency management/ response plan in consultation with SES.
- The proposal must not increase the existing risk to life and evacuation. The Local Flood Plan should be considered since the racecourse will be surrounded by flood waters during rare flooding.
- The NSW SES is the agency responsible for emergency management and EES recommends their advice is sought on the emergency management measures for this proposal.
- Occupiers and owners at the racecourse should be educated on the potential flood risk within and outside the vicinity of the racecourse, before, during and after a flood event. A flood emergency management plan including community education and awareness should also be discussed with the NSW SES.

Response

The Applicant acknowledges the concerns raised by EESG and the importance of managing flood risk. The Applicant is aware of the rare risk of flooding around the racecourse in the event of severe and extreme weather events.

The Applicant provides the following response to the matters raised by EESG:

- The proposed night racing at Royal Randwick Racecourse is an extension to the existing operating procedures for the site (day-time racing events). The proposed development will not increase the number of racing events on site and therefore it is considered there is no increase to the existing risk to life associated with events.
- Royal Randwick Racecourse has a current Event Operational Management Plan (**EOMP**) that assesses risk to life, security and evacuation management procedures. Whilst the EOMP does not strictly contain a flood risk management plan, the existing evacuation management procedures are comprehensive in identifying the safe egress points to be used with consideration of rapid risk assessment in the event of any emergency. The updated EOMP for the proposed night racing has reviewed existing procedures with consideration of any additional factors of safety after dark associated with night racing events.
- The Australian Turf Club has established universal procedures for all of its racecourses that in the risk of poor weather – racing events are cancelled. A recent example of this cancellation procedure being implemented due to poor weather was on the 26th March 2022, where by the *Stages Day* racing event at Rosehill Gardens Racecourse was cancelled. The cancellation of racing events is paramount to the health and safety of jockeys and horses as it is unsafe to race on a wet track. This procedure to cancel in the event of poor weather inherently mitigates the safety risk from flooding during race events as there is minimal chance whereby patrons would be on site in inclement weather. As such, it raises the bar of risk management of poor weather far above the likelihood of a flooding event to occur. This risk management exists for existing day time racing events and proposed night racing events alike.
- A preliminary review of the Kensington-Centennial Park Floodplain Risk Management Study and Plan prepared by WMA water, dated 7 February 2019 indicates that there is risk of localised flooding, including sections of Royal Randwick Racecourse and surrounding roads, in a 1% AEP event. However, the Applicant agrees with the EESG that the Spectator Precinct and majority of the racecourse will remain a high flood island and safe refuge point. This scenario exists for existing day time racing events and proposed night racing events alike.
- Based on the above, the Applicant considers the risk to safety of patrons and people associated with the operation of the racecourse from flooding is extremely low and is already being managed.



However, it is understood that there may be broader benefits in consulting with the SES to discuss emergency management measures. Noting the late request for consultation with SES, consultation with SES is considered unnecessary to delay the assessment of SSD-8706. It is suggested that the requirement for consultation with the SES and creation of a flood emergency management plan be prepared post consent, as a condition of consent imposed by the DPE for SSD-8706.

We trust this additional information provided is sufficient to facilitate the timely determination of SSD-8706.

Please do not hesitate to contact the undersigned on 02 8233 9946 or rbarry@urbis.com.au should you require any further information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "RB", with a stylized flourish extending from the bottom right.

Richard Barry
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