

***Planning Proposal:
Amendment to Randwick LEP 1998
Royal Randwick Racecourse, Randwick***



May 2012

Cover Photograph: Aerial view of Royal Randwick Racecourse, Randwick (Source Google Earth)

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TABLE OF CONTENTS

1.	EXECUTIVE SUMMARY	1
2.	BACKGROUND	1
3.	SUBJECT SITE	2
4.	THE PROPOSAL	4
5.	RELEVANT PLANNING DOCUMENTS	6
6.	SUMMARY OF KEY ISSUES	10
7.	LEP PRO-FORMA EVALUATION CRITERIA FOR SPOT REZONINGS	10
8.	DEPARTMENT OF PLANNING & INFRASTRUCTURE CRITERIA FOR JUSTIFYING PLANNING PROPOSALS	10
PART 1.	OBJECTIVES OR INTENDED OUTCOMES OF THE PLANNING PROPOSAL	10
PART 2.	EXPLANATION OF PROVISIONS	10
PART 3.	JUSTIFICATION	11
PART 4.	COMMUNITY CONSULTATION	13
9.	RELATIONSHIP TO THE RANDWICK CITY PLAN	14
10.	FINANCIAL IMPACT STATEMENT	14
11.	CONCLUSION	14
12.	RECOMMENDATION	14
APPENDIX 1	APPLICANT'S PLANNING PROPOSAL	15
APPENDIX 2	APPLICANT'S STATEMENT OF HERITAGE IMPACT	16
APPENDIX 3	DIRECTOR GENERAL REQUIREMENTS FOR STATE SIGNIFICANT DEVELOPMENT APPLICATION SSD 5002-2011- HOTEL ON THE ROYAL RANDWICK RACECOURSE	17
APPENDIX 4	SPOT REZONING- PRO-FORMA QUESTIONS EVALUATION (PLANNING CIRCULAR PS -06_015)	18
APPENDIX 5	DRAFT ADDITION TO SCHEDULE 2 & MAP	20

1. EXECUTIVE SUMMARY

The Department has received a request to amend the zoning of the Royal Randwick Racecourse (RRR) site, Randwick. The objective of the proposed amendment is to facilitate the development of a hotel on the racecourse site.

The applicant, the Australian Turf Club (ATC), seeks to develop a hotel (providing overnight accommodation) on the racecourse site. The RRR is zoned 6(a) Open Space under the *Randwick Local Environmental Plan 1998 (Consolidation)* (Randwick LEP 1998). Hotel uses are a prohibited use within the 6(a) Open Space zone. The Planning Proposal (PP) will facilitate for the provision of a hotel on the site.

This PP has been submitted with a State Significant Development (SSD) application for a hotel on the RRR site. The consideration of the PP and the SSD application by the Department will occur concurrently. In accordance with section 89E(5) of the *Environmental Planning & Assessment Act 1979* (the Act), the Director General is the relevant planning authority (RPA) under Part 3 of the Act, in this instance.

The PP seeks to amend Schedule 2 'Development of land for certain additional purposes', of the Randwick LEP 1998 to include 'motels', 'serviced apartments', 'hotels', 'restaurant' and 'function centres', as additional permissible uses on the RRR site.

The applicant has submitted a request justifying the PP and addressing the key issues relating to the proposed amendment. This report considers the merits and justification for commencing the preparation of a local planning instrument.

The PP is supported in principal and it is considered that there is sufficient information to justify proceeding with the rezoning request. The exhibition of the PP and the hotel SSD application will be carried out concurrently.

2. BACKGROUND

In October 2011, the Act, was amended to include provisions for State Significant Development (SSD) (Division 4.1). Under section 89E(2) consent may not be granted for an SSD application for development which is wholly prohibited by an environmental planning instrument.

In November 2011, the ATC lodged an SSD application for a hotel (providing overnight accommodation) on the RRR, Randwick (SSD 5002-2011). The RRR site is zoned 6(a) Open Space under the Randwick LEP 1998. Hotel uses are a wholly prohibited use within the 6(a) Open Space zone. The Department is not therefore able to determine the current hotel SSD application, as the development is wholly prohibited use under the Randwick LEP 1998.

Notwithstanding this, section 89E(5) of the Act facilitates for the consideration of an SSD application for a prohibited development, in conjunction with a proposed environmental planning instrument, to permit the carrying out of that development. In this instance the Director General undertakes the role of the RPA.

On 15 February 2012, the ATC submitted a request to the Department to commence the preparation of a PP to facilitate a hotel on the RRR site. This PP is being prepared concurrently with the consideration of the SSD application for a hotel on the racecourse site.

This PP has been prepared by the Department's Major and Regional Projects South team, in accordance with section 55 of the Department's '*A Guide to Preparing Local Environmental Plans*' and '*A Guide to Preparing Planning Proposals*' and is based on the applicant's submission to the Department, dated April 2012 (included within **Appendix 1**).

To ensure fairness and transparency within the PP process, the Department's review of the PP will be undertaken by the Department's Sydney Region East Branch. The recommendation of the Sydney Region East Branch will be forwarded to the Minister for Planning & Infrastructure for Gateway determination, under section 56 of the Act.

Under section 89E(6) of the Act, if the Gateway determination for this PP declares that the proposed instrument is principally concerned with permitting the carrying out of State significant development that would otherwise be prohibited, the instrument and the hotel SSD application may only be determined by the Planning Assessment Commission.

3. SUBJECT SITE

The proposal relates to land known as the RRR (Lot 2009 in DP 1169042), located in Sydney's eastern suburbs and in the Randwick City Council Local Government Area. The site is leased by the ATC on a 99 year lease, which was recently renewed.

The RRR site has an area of approximately 79 hectares. The racecourse hosts approximately 40 horse racing events annually, stables approximately 600 horses, provides for amenities and services for race club members and accommodates ancillary infrastructure and car parking. The racecourse also hosts a number of large and smaller scale one-off non-race day events each year. The ATC has identified 5 separate precincts on the racecourse site, detailed in **Table 1** below:

Table 1: RRR Precincts

The Spectator Precinct-	Located in the north-west corner, with frontages to Alison Road and Doncaster Avenue. Occupied by the Queen Elizabeth II Stand, Paddock Stand, Randwick Pavilion Building, Tea House building, Swab building, escalator structures and Parade Ring and winners enclosure. Approval has been granted under MP10_0097 for the following: alterations to the Queen Elisabeth II Stand, demolition and reconstruction of the Paddock Stand and the construction of a new 'link building' between the two stands, construction of a new parade ring, a new owner's and trainer's pavilion building, adaptive reuse of the Swab building and the demolition of the Randwick pavilion and Tea House.
The Stables Precinct	Located on the eastern portion of the racecourse site with frontages to Wansey Road and Alison Road. The land is currently occupied by stables and is used for horse training. Approval has been granted under MP10_0098 for the demolition of existing buildings and the construction of 6 x 2 storey stable buildings accommodating up to 600 horses, 12 x 2 storey mechanical horse walkers, staff accommodation and a number of other related horse training facilities.
Lower High Street Precinct	Located on the south-west sector of the racecourse with frontages to High Street, Anzac Parade and Doncaster Avenue. The site is accommodates stabling and residential buildings. Surrounding development includes the University of NSW and Randwick Hospital.
Upper High Street Precinct	Located in the south-east corner of the racecourse, raised above the levels of the rest for the racecourse. Area is occupied by low density residential development and utilized for institutional uses and racing activities.
Infield Precinct	Located within the racetrack itself, is utilised for transport and parking for race and entertainment events (including festivals and World Youth Day).

The area of the racecourse, subject to the hotel SSD application has an area of 6,336.09m² and is located within the Spectator Precinct, in the northern part of the racecourse. A site plan and location of each precinct and the location of the hotel, as proposed by the SSD application, is illustrated in **Figure 1** below.

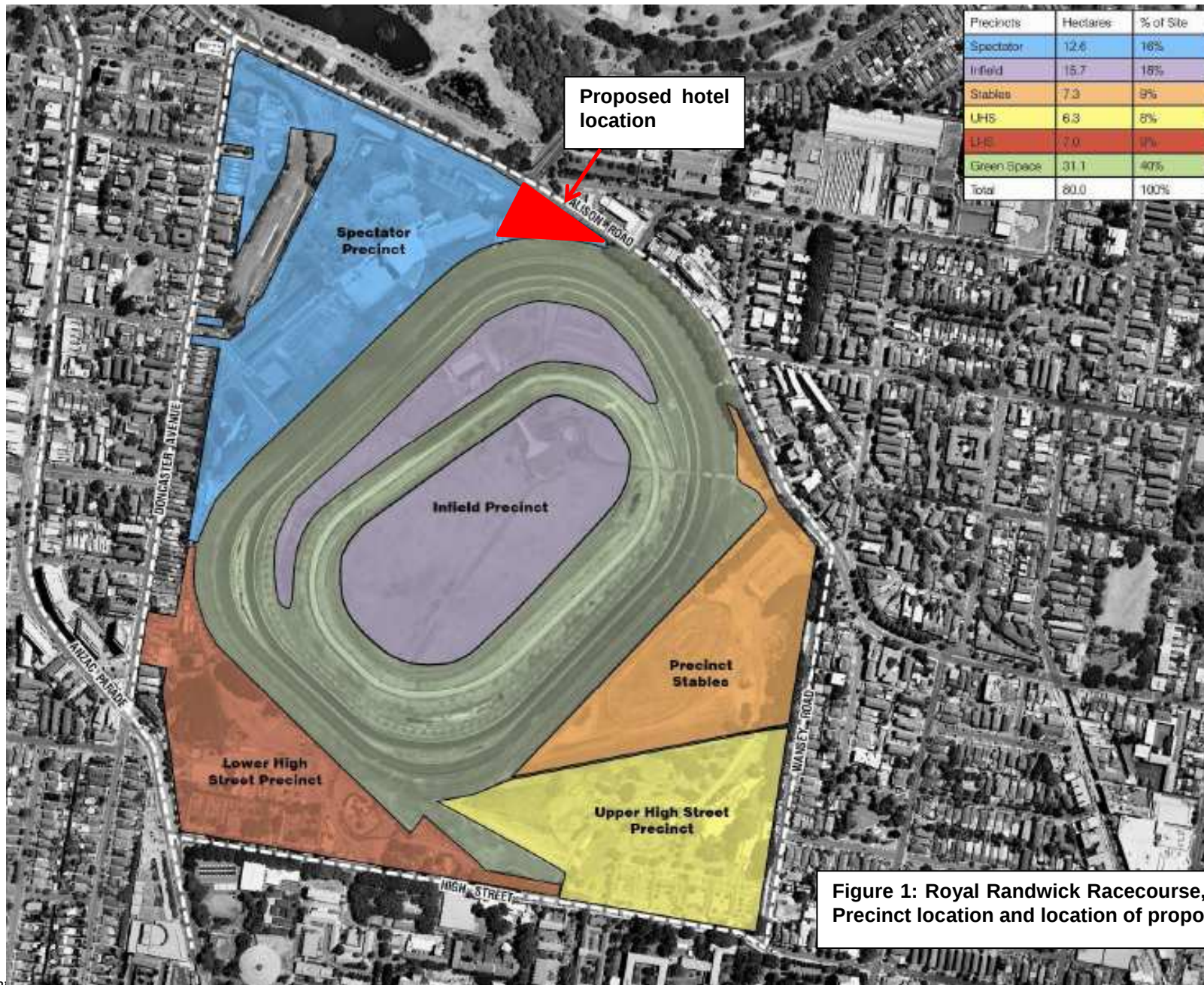


Figure 1: Royal Randwick Racecourse, Site Plan, Precinct location and location of proposed hotel

To the north of the RRR site is the Centennial Parklands. To the west lie a range of medium density residential development types and the Kensington Village shopping area. Residential development also lies to the west. Immediately south of the racecourse site is High Street and the Randwick shopping village, with the University of NSW West Kensington Campus and Randwick Hospital complex beyond.

4. THE PROPOSAL

The Proposed Hotel

The ATC has requested the commencement of this PP to facilitate a hotel on the RRR, Randwick. The hotel, as proposed by the concurrent SSD application (SSD 5002-2011) includes the following:

- a building 8 storeys in height;
- gross floor area of 13,318m²;
- 170 guest rooms located on levels 3- 7;
- some rooms to have kitchenette facilities to enable a longer stay;
- conference and event facilities;
- restaurant;
- bar facilities;
- swimming pool; and
- 50 car parking spaces and loading dock located in single level basement.

The proposed hotel has a capital investment value (CIV) of \$44.3 million. The development is therefore State Significant Development under Schedule 2 of the State Environmental Planning Policy (State and Regional Development) 2011, which identifies any development on the RRR site with a CIV in excess of \$10 million, as such.

The proposed hotel forms part of the holistic redevelopment of the RRR site. The applicant has advised that the redevelopment aims to provide a world-class racing and cultural venue, through increased patronage and an increased diversity of uses. The proposed hotel is intended to develop the recreational role of the racecourse as a major local and international tourism, leisure and events venue.

The NSW Government has allocated \$150 million for improvements to the RRR. Development approval has previously been granted for the first two stages of the redevelopment including refurbishment works to the Spectator Precinct and new stabling facilities located within the Stables Precinct. The hotel proposal represents the next stage of the upgrades to the Spectator Precinct. Future stages of the upgrades are likely to consist of a 'centre for excellence' commercial building and conference/ exhibition centre.

The Planning Proposal

The PP seeks to amend Schedule 2 'Development of land for certain additional purposes', of the Randwick LEP 1998, to include additional permitted uses on the RRR site. The following additional uses are proposed:

- motel- means a building providing short-term accommodation for travelers and tourists, but (in Part 2) does not include a building elsewhere defined in this clause (Clause 49 of Part 5 of the Randwick LEP 1998).
- serviced apartment- means a dwelling which is cleaned and otherwise serviced or maintained by the owner or manager of the building or the owner's or manager's agent, and which provides temporary accommodation for people whose principal place of residence is elsewhere.
- hotel- means a building or place specified in a hotelier's licence granted under the Liquor Act 1982.
- restaurant- means a building or place used for the provision of food or drink (or both), whether or not for consumption on the premises or for takeaway.

- Function centre- means a building or place used for the holding of events, functions, conferences and the like, and includes convention centres, exhibition centres and reception centres, but does not include an entertainment facility.

The definitions of the aforementioned 'motel', 'serviced apartment', 'hotel' and 'restaurant' uses, are consistent with definitions within the Randwick LEP 1998. There is no definition of 'function centres' within the Randwick LEP 1998, it is therefore proposed to use the definition within the Standards Instrument (Local Environmental Plans) Order 2006. The 'function centres' definition will be required to be included within Schedule 2 of the Randwick LEP 1998.

Relationship with the Randwick Draft Comprehensive LEP 2012

Between 21 February and 2 April 2012, Randwick City Council exhibited the Randwick Draft LEP 2012. The Randwick Draft LEP 2012 proposes to rezone the whole Randwick Racecourse site RE1 Public Recreation. The proposed hotel use would be a prohibited use under the racecourse site's proposed RE1 zone.

Clause 1.8A of the Draft LEP 2012 'Savings provisions relating to development applications' is a Department of Planning and Infrastructure model clause. It allows for development applications made before the commencement of the Randwick LEP 2012, but not yet determined, to be determined in accordance with the relevant controls in force prior to the commencement of the Randwick LEP 2012.

The Hotel SSD development application was made on 7 November 2011. The development application will therefore be determined in accordance with the controls within the Randwick LEP 1998.

4.1 Studies Submitted by the Applicant

The applicant has submitted a Preliminary Environmental Impact Statement and PP to support the request for a PP and to inform the Director General's Environmental Assessment Requirements (DGRs) for the SSD application. The applicant's submission is included in **Appendix 1**.

The applicant has submitted a Statement of Heritage Impact, prepared for a previous major development application for the redevelopment of part of the RRR Spectator Precinct. The report provides an analysis of the heritage significance of the existing buildings within the Spectator Precinct, immediately adjacent to the subject site (**Appendix 2**). An updated Heritage Impact Statement for the site will be submitted as part of the documentation for the concurrent hotel SSD application.

4.2 Future Studies

In March and April 2012, the Department consulted with Council and relevant Government agencies, including the NSW Heritage Council, on the draft DGRs for the hotel SSD application. The final DGRs were issued on 23 April 2012. The DGRs identify specific planning issues which are required to be addressed in the applicant's Environmental Impact Statement for the SSD application. The DGRs also include any additional technical reports which will be required to support the application, including the following:

- Shadow Diagrams;
- Traffic Impact Study;
- Tree Management Strategy and Arboricultural Assessment;
- Landscape Plan;
- Acoustic Report;
- Heritage Impact Statement;
- Visual and View Analysis, including the use of photomontages;
- Stormwater Management Plan;
- Waste Management and Recycling Plan;
- a Functions and Events Management Plan; and

- a Construction Traffic Management Plan.

The final DGRs for the Hotel SSD application, as well as referral responses received from Council and Government agencies, are attached in **Appendix 3**.

5. RELEVANT PLANNING DOCUMENTS

Randwick LEP 1998 (Consolidation)

The site is zoned Open Space 6(a) under the Randwick LEP 1998 (see **Figure 2** below). The whole RRR site is covered by the RRR Conservation Area and the official members stand is a locally listed Heritage Item.

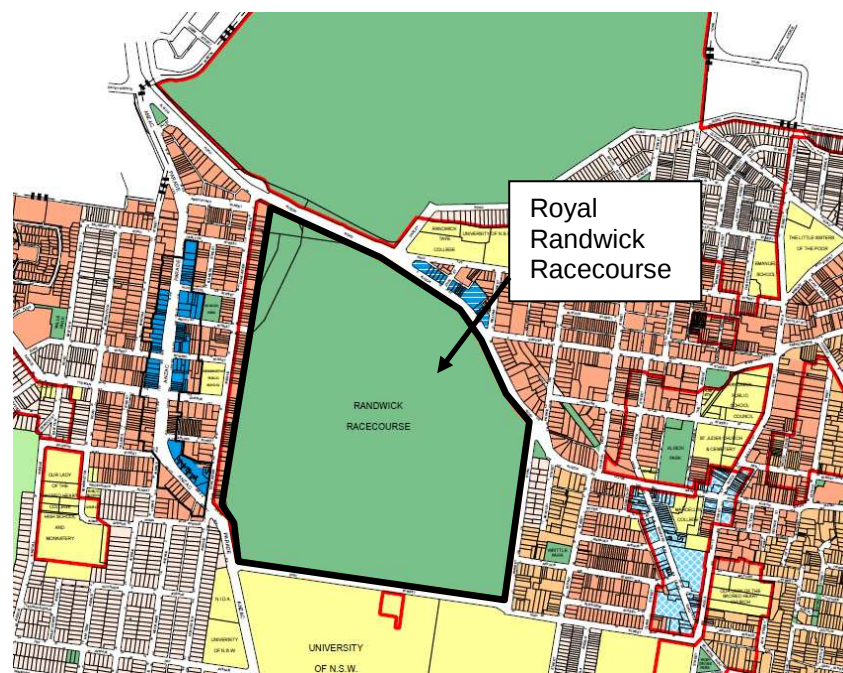


Figure 2: Current Zoning Map, Randwick City Council LEP (Consolidated) 1998

Draft Randwick LEP 2012

Randwick City Council exhibited the *Randwick Draft Local Environmental Plan 2012* (Randwick Draft LEP 2012) from 21 February until 2 April 2012. The Randwick Draft LEP 2012 proposes to zone the whole RRR site, RE1 Public Recreation. Hotel uses would be prohibited within the proposed RE1 Public Recreation zone.

Randwick Development Control Plans

- Royal Randwick Racecourse Development Control Plan 2007; and
- Development Control Plan: Parking 1998.

State Environmental Planning Policy No. 55- Contaminated Land

The applicant has confirmed that a preliminary contamination report will be submitted with the Environmental Impact Statement (EIS) for the hotel SSD application to address contamination issues.

State Environmental Planning Policy (Infrastructure) 2007

Clause 104 of the State Environmental Planning Policy (SEPP) requires that development for tourist facilities, recreational facilities and showgrounds, which provide parking for 50 or more cars, with access to a classified road, are referred to Roads and Maritime Services (RMS). As the proposed SSD application will provide parking for 50 cars, both the SSD and PP will be referred to RMS for comment as part of the public exhibition.

In addition, the applicant has confirmed that the Environmental Impact Statement (EIS) will be accompanied by an assessment of traffic impacts.

State Environmental Planning Policy (State and Regional Development) 2011

The RRR is listed as a State Significant Site in Schedule 2 of the SEPP. The listing prescribes that all development with a capital investment value of more than \$10 million is State significant.

Section 117 Directions

The Section 117 Ministerial Directions (under section 117(2A) of the Act requires PPs to be consistent with the terms of the direction. The section 117 Directions relevant to this PP are considered in **Table 2** below:

Table 2: Assessment of Relevant Ministerial (section 117) Directives

Direction	Objective	Consistency Test	Comments
2. Environment & Heritage 2.3 Heritage Conservation	The objective of this direction is to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance.	A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that: (a) the environmental or indigenous heritage significance of the item, area, object or place is conserved by existing or draft environmental planning instruments, legislation, or regulations that apply to the land, or (b) the provisions of the planning proposal that are inconsistent are of minor significance.	The site of the proposed hotel falls within the RRR Conservation Area but does not include any heritage items. The impacts of the development on the RRR Conservation Area and adjoining heritage items will be addressed within a future Heritage Impact Statement.
3. Housing, Infrastructure and Urban Development 3.4 Integrating Land Use & Transport	The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives: (a) improving access to housing, jobs and services by walking, cycling and public transport, and (b) increasing the choice of available transport and reducing dependence on cars, and (c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and (d) supporting the efficient and viable operation of public transport services, and (e) providing for the efficient movement of freight.	A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are: (a) justified by a strategy which: (i) gives consideration to the objective of this direction, and (ii) identifies the land which is the subject of the planning proposal (if the planning proposal relates to a particular site or sites), and (iii) is approved by the Director-General of the Department of Planning, or (b) justified by a study prepared in support of the planning proposal which gives consideration to the objective of this direction, or (c) in accordance with the relevant Regional Strategy or Sub-Regional Strategy prepared by the Department of Planning which gives consideration to the objective of this direction, or	The EIS for the hotel SSD will include a Traffic Impact Study which will provide an assessment of non-private vehicle travel methods as well as detailing measures to promote the use of public transport and pedestrian and bicycle linkages.

		(d) of minor significance.	
4. Hazards and Risks 4.3 Flood Prone Land	The objectives of this direction are: (a) to ensure that development of flood prone land is consistent with the NSW Government's Flood Prone Land Policy and the principles of the <i>Floodplain Development Manual 2005</i> , and (b) to ensure that the provisions of an LEP on flood prone land is commensurate with flood hazard and includes consideration of the potential flood impacts both on and off the subject land.	A planning proposal may be inconsistent with this direction only if the relevant planning authority can satisfy the Director-General (or an officer of the Department nominated by the Director-General) that: (a) the planning proposal is in accordance with a floodplain risk management plan prepared in accordance with the principles and guidelines of the Floodplain Development Manual 2005, or (b) the provisions of the planning proposal that are inconsistent are of minor significance.	The EIS accompanying the hotel SSD application will include an assessment of drainage and flooding issues associated with the development including stormwater and drainage infrastructure.
6. Local Plan Making 6.3 Site Specific Provisions	The objective of this direction is to discourage unnecessarily restrictive site specific planning controls.	A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Director-General of the Department of Planning (or an officer of the Department nominated by the Director-General) that the provisions of the planning proposal that are inconsistent are of minor significance.	The objective of the PP is to facilitate for a hotel on the RRR site. It seeks to amend Schedule 2 of the Randwick LEP 1998, to allow additional permitted uses on the RRR site.

6. SUMMARY OF KEY ISSUES

The main issues relating to the rezoning of the site that require further review and clarification are:

- the **suitability of the site** for the proposed hotel use, in terms of site location, relationship with the existing racecourse functions and impacts on surrounding development;
- developing an appropriate **built form** in response to an urban design study to inform the building height and FSR;
- the resulting impacts on **visual impacts/ views** from within the site and from areas of the surrounding public domain;
- consideration of **traffic impacts** on the existing road network and any board measures to maximise non-private vehicle travel methods;
- management of **heritage items/spaces** and significance of the whole site; and
- **relationship with existing and future development** on the RRR site.

7. LEP PRO-FORMA EVALUATION CRITERIA FOR SPOT REZONINGS

In relation to spot rezonings, the Department shall consider whether or not a spot rezoning has merit and that the proposal is justified given its State and/or regional significance, dwelling and/or employment potential. The required pro forma evaluation questions conclude that this proposal warrants consideration as a one-off rezoning given the proposal's consistency with the Metropolitan Plan for Sydney 2036 and the Draft East Subregional Strategy. The Department's evaluation of the PP against the spot rezoning pro-forma criteria is detailed in **Appendix 4**.

8. DEPARTMENT OF PLANNING & INFRASTRUCTURE CRITERIA FOR JUSTIFYING PLANNING PROPOSALS

Based on the applicant's submission, the PP has been prepared by the Department of Planning's Metropolitan & Regional Projects South team, consistent with the Department's guidelines. The following Parts 1 to 4 address the questions set out in the Department's 'A Guide to Preparing Planning Proposals'.

PART 1. OBJECTIVES OR INTENDED OUTCOMES OF THE PLANNING PROPOSAL

Requirement: Provide a concise statement setting out the objectives or intended outcomes of the PP, as a basis for the drafting of the legal instrument (LEP).

Response: The objective of the PP is to allow additional permitted uses on the RRR site, to accommodate a current SSD application for a hotel, a prohibited use under the Randwick City Council LEP 1998.

PART 2. EXPLANATION OF PROVISIONS

Requirement: An explicit statement of how the objectives or intended outcomes are to be achieved by means of new controls on development imposed via an LEP.

Response: The objective or intended outcome of the PP is proposed to be achieved by amending Schedule 2 'Development of land for certain additional purposes', of the Randwick LEP 1998, to allow 'motels', 'serviced apartments', 'hotels', 'restaurants' and 'function centres' as additional permitted uses on the RRR site. The proposed additional uses are all defined by the Randwick LEP 1998, with the exception of 'function centres'. The definition of 'function centres' included

within the Standard Instrument (Local Environmental Plans) Order 2006, is therefore proposed to be included within amended Schedule 2.

A draft Schedule entry is attached to assist with the explanation of the provision (**Appendix 5**).

PART 3. JUSTIFICATION

Requirement: To set out the case for changing the zones and/or development controls on the land affected by the proposed LEP. There are a number of specific questions that must be discussed with reasons explained.

Response: the applicant's submission notes that the rezoning will enable the provision of a hotel on the RRR, contributing to the diversity of uses on the RRR site, creating additional jobs, improving the range of accommodation within the area and enhancing the cultural and sporting assets of the RRR.

A. The need for the Planning Proposal	
1. Is the PP a result of any strategic study or report?	No, the PP has been submitted as a spot rezoning to facilitate a hotel at the RRR. The proposed hotel is located within the Spectator Precinct, identified within the RRR Development Control Plan 2007 (RRR DCP 2007). The RRR DCP 2007 outlines the objectives of the Spectator Precinct as being: • optimising the 'spectator experience' for race days and other major events; • enabling the Australian Jockey Club (now the ATC) to improve its membership base and ongoing viability; and • promoting recreational use on non-race days. The proposal is consistent with the appropriate uses identified for the Spectator Precinct, identified within the RRR DCP 2007.
2. Is the PP the best means of achieving the objectives or intended outcomes, or is there a better way?	Yes. It is considered that an amendment to the Randwick LEP 1998 is the most appropriate method to achieve the objective. The RRR is zoned Open Space 6(a) under the Randwick LEP 1998. A hotel is a prohibited use within the 6(a) zone. The preparation of the PP will allow the determination of the concurrent SSD application for a hotel on the RRR.
3. Is there a net community benefit?	Yes. A net community benefit test has not been undertaken for the proposal. However, it is considered that a net community benefit will arise from the rezoning of land. The provision of a potential hotel on the site will reinforce the status of the racecourse as a major tourist attraction and enhance facilities for members, patrons visitors and the local community.
B. Relationship to Strategic Planning Framework	
4. Is the PP consistent with the objectives and actions contained within the applicable regional or sub-regional strategy (including the Sydney Metropolitan Strategy and exhibited draft strategies)?	Yes. The proposal will contribute to the diversity of uses within the 'Randwick Specialised Centre- (Randwick Education and Health)' identified within the Metropolitan Plan for Sydney 2036 and the Draft East Subregional Strategy, which includes the RRR. The proposal will make a contribution to the specialised centre's growth as a more intense node for employment and business.

	The PP is also consistent with the Draft Subregional Strategy's objectives for the site as a major sporting facility in terms of encouraging opportunities to refurbish, reorientate and increase the carrying capacity of existing sporting facilities. The Draft East Subregional Strategy requires the State Government, Randwick Council, the hospitals, the UNSW and the Royal Randwick Racecourse to establish a planning partnership to develop a Masterplan for the centre to provide a framework for its long-term growth and development.
5. Is the PP consistent with the local Council's Community Strategic Plan, or other local strategic plan?	Yes. Randwick City Council recently prepared its community strategic plan in line with the new Integrated Planning and Reporting legislation and guidelines, the Randwick City Plan 2010. The Proposal is consistent with the Randwick City Plan which identifies the Royal Randwick Racecourse as a land use which benefits the local community. The Plan seeks to maintain Council's recreation areas, including the racecourse, as <i>'inviting, well designed, multi-purpose, safe, attractive and easily maintained'</i>. The proposal seeks to ensure that the viability of the Royal Randwick Racecourse is secured by allowing for the ongoing upgrade of facilities on the racecourse site.
6. Is the PP consistent with applicable State Environmental Planning policies?	Yes. The PP is consistent with all applicable SEPPs. In particular it is considered that the proposal is consistent with the State & Regional Development SEPP because it will facilitate for development on the Royal Randwick Racecourse site, which is identified as being of State significance by the SEPP. The PP is also consistent with SEPP- Contaminated Land (SEPP 55) as it would facilitate for the remediation of any contaminated land to ensure its suitability for any proposed development. The PP is also consistent with SEPP Infrastructure 2007 in that any proposed development requiring so would be referred to the Roads & Maritime Services, in accordance with the requirements of the SEPP.
7. Is the PP consistent with applicable Ministerial Directions (s.117 directions)?	Yes, see section 5 above.
C. Environmental, Social and Economic Impact	
8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?	No. The RRR is a developed site and there are no known critical habitats or threatened species populations on site. There are a number of significant trees on the site. A Tree Management Strategy and Arboricultural Assessment will be prepared as part of the concurrent SSD EIS.
9. Are there any likely environmental effects as a result of the PP and how are they proposed to be managed?	The additional technical studies to be submitted as part of the EIS will provide an assessment of any likely environmental impacts and how these will be managed.
10. How has the PP adequately	The technical studies to be submitted after the Gateway

addressed any social and economic effects?	determination will address social and economic impacts.
D. State and Commonwealth Interests	
11. Is there adequate public infrastructure for the PP?	Yes, the site is a developed site. The EIS, accompanying the SSD application, will address flooding issues and necessary water management issues.
12. What are the views of State and Commonwealth public authorities consulted in accordance with the Gateway Determination?	The Department will be seeking the views of public authorities under section 57 of the Act, which will run concurrently with the exhibition of the hotel SSD application. The ATC is required to consult with the following agencies during the preparation of the EIS for the hotel SSD application: • Randwick City Council; • Roads and Maritime Services; • NSW Police; • Environment Protection Authority; • The NSW Heritage Council; • Transport NSW; and • Sydney Airports Corporation.

The case for changing the zoning on the land affected by the proposed LEP is adequately justified. It is appropriate that the site be rezoned to facilitate for a hotel use on the racecourse site. The proposal will provide for opportunities for hospitality, function and event facilities on the racecourse. It will also add to the range of tourism related facilities at the racecourse and provide local accommodation opportunities, primarily for patrons of Royal Randwick and more generally for those visiting the area.

PART 4. COMMUNITY CONSULTATION

Requirement: This part should outline the community consultation that is to be undertaken in respect of the PP.

Response: The applicant is committed to continuing the process of consultation with a range of partners following the Gateway determination including: Randwick City Council and other agencies including Roads and Maritime Services (RMS), Transport for NSW, the State Transit Authority (STA), adjoining land users including the University of NSW and the Prince of Wales Hospital, as well as the local community.

Initial consultation with the Department and the wider Royal Randwick redevelopment program has resulted in a core 'Reference Group' being set up. The Reference Group consists of representatives of the Department, Randwick City Council, the University of NSW and the ATC.

The Department will consult with all key Government agencies including Transport for NSW, RMS, the Environment Protection Authority (EPA), the Heritage Branch, STA, NSW Police, Sydney Airports Corporation and the local community.

It is recommended that the community consultation for the PP occurs concurrently with the public exhibition for the hotel SSD application. The statutory exhibition period for the SSD application is 30 days. The required exhibition period is extended to 45 days, if any of the exhibition overlaps with school holidays. The community consultation period is therefore recommended to be 30 or 45 days, dependent on the timing of the consultation.

9. RELATIONSHIP TO THE RANDWICK CITY PLAN

The relationship of the PP with the Randwick City Plan as follows:

Outcome	8	Strong Local Economy
Directions	8a	Vibrant business, commercial and industrial sectors that provide ongoing and diverse employment opportunities
	8d	Develop and strengthen effective partnerships with key locally based organisations
	8e	Tourism's important role in the local economy is acknowledged

10. FINANCIAL IMPACT STATEMENT

Under section 256O of the Environmental Planning & Assessment Regulations 2000, the applicant is required to pay the applicable fees for the consideration of the proposed environmental planning instrument in conjunction with the concurrent SSD application, under S89E(5) (a total of \$22,650 plus \$1,130 for each hectare (or part hectare of) of the Act.

11. CONCLUSION

The proposal to amend Schedule 2 'Development of land for certain additional purposes' to allow a single hotel on the RRR site, is acceptable in principle however, further technical studies will be required prior to public exhibition so as to inform preparation of a draft LEP to clarify the zones. The Department's planning criteria for preparing PPs and LEPs have been addressed and there is sufficient justification for the PP to proceed to 'Gateway determination'. Whilst the concept is preliminary only, key design controls including location of the hotel, maximum building height and FSR will need to be developed by the applicant through an urban design study and incorporated into local planning controls. The PP will be reported back to the Department's Metropolitan & Regional Projects South team, when all the relevant studies have been completed and prior to exhibition.

12. RECOMMENDATION

That the Department:

1. commence the process to prepare a local environmental plan to amend Schedule 2 of the Randwick LEP 1998, in accordance with s54 of the Act to add a hotel as an additional permitted use on the RRR to allow for the development of a hotel on the site;
2. adopt the PP (**Appendix 1**) for the RRR, Randwick prepared by Urbis, on behalf of the ATC, in accordance with section 55 of the Act; and
3. forward the PP to the Minister for Planning & Infrastructure requesting a Gateway determination in accordance with section 56 of the Act.

**APPENDIX 3 DIRECTOR GENERAL REQUIREMENTS FOR STATE
SIGNIFICANT DEVELOPMENT APPLICATION SSD 5002-2011-
HOTEL ON THE ROYAL RANDWICK RACECOURSE**

APPENDIX 4 SPOT REZONING- PRO-FORMA QUESTIONS EVALUATION (PLANNING CIRCULAR PS -06_015)

Question	Department Comment
Will the LEP be compatible with agreed State and regional strategic direction for development in the area (eg land release, strategic corridors, development within 800 metres of a transit node)?	The RRR site is identified within the Metropolitan Plan for Sydney 2036 and Draft East Subregional Strategy, as part of the 'Randwick Specialised Centre- (Randwick Education and Health)'. While not a key anchor in the specialised centre, the racecourse is a major land use and combined with other institutions within the specialised centre and the nearby town centres of Randwick, Kingsford and Kensington, can make a contribution to its growth as a more intense node for employment and business. This is supported by objectives within the Metropolitan Plan which identifies the City to Randwick bus corridor as a short term priority corridor for the State. The Subregional Strategy identifies the RRR as a major sporting facility in the Strategy, which encourages consent authorities to consider any opportunities to refurbish, reorientate and increase the carrying capacity of existing sporting facilities. The Subregional Strategy identifies the RRR as having a regional role as a sporting and cultural event location. The State and regional significance of the RRR is further emphasised by the inclusion of the RRR site as an identified site, under Schedule 2 of the State Environmental Planning Policy (State & Regional Development) 2011. In 2011, the Minister authorised the submission of a Concept Plan application for the redevelopment of the RRR site. The proposal had a CIV of approximately \$1.6 billion. In this context, the proposed LEP amendment will be compatible with the agreed State and regional strategic direction for the RRR site.
Will the LEP implement studies and strategic work consistent with State and regional policies and Ministerial (section 117) directions?	The proposed PP will implement studies and strategic work consistent with State and regional policies and Ministerial (section 117) directions. Details of the studies and strategic work to be prepared are listed in the section of this report titled 'Relevant Planning Documents'. The report also includes an assessment of the proposed hotel use against the relevant Ministerial (section 117) directions.
Is the LEP located in a global/regional city, strategic centre or corridor nominated within the Metropolitan Strategy or other regional/subregional strategy?	The RRR is the largest racecourse in NSW and has been conducting races for over 160 years. The site is located within the global city of Sydney, only 6 kilometres from Sydney CBD. The site forms part of the 'Randwick Specialised Centre-

	(Randwick Education and Health)', identified within the Metropolitan Plan for Sydney 2036 and Draft East Subregional Strategy. The designation provides a broad framework for the long-term development of the area, building on its economic and employment roles through the consolidation and strengthening of its medical and education assets.
Will the LEP facilitate a permanent employment generation activity or result in a loss of employment lands?	The applicant has indicated that the proposed hotel use, facilitated by the LEP amendment could provide up to 320 full time equivalent jobs and 160 construction jobs and that the increased viability of the racecourse would support existing employment on the site.
Will the LEP be compatible/ complimentary with surrounding land uses?	The proposed hotel use represents part of the long term holistic vision for the redevelopment of the RRR site, being partially facilitated by funding up to the value of \$150 million from the NSW Government. The redevelopment vision for the RRR site includes: • upgrading of the Queen Elizabeth 2 grandstand, increasing its capacity, new corporate boxes and event lounges, enclosure of part of the grandstand and ESD measures (in the spectator precinct); • theatre of the Horse, a new multi-purpose parade ring with 4,500 seating capacity, improved owners, jockeys and trainers facilities, as well as indoor and outdoor dining and bar areas (in the spectator precinct); • the consolidation of existing stables to one precinct with stabling facilities for up to 600 stables, allowing all horses trained at the racecourse to be stabled on-site, including horse walkers, equine pool, tunnel access and parking (located in the Bull Ring precinct). The impacts of the proposed LEP amendment will be assessed as part of the assessment of the PP and the SSD application for a hotel on the RRR site.

APPENDIX 5 DRAFT ADDITION TO SCHEDULE 2 & MAP

Column 1 Land	Column 2 Development	Column 3 Condition
Land on the Royal Randwick Racecourse, Randwick, (Lot 2009 in DP 1169042), shown hatched in blue on the map marked 'Randwick Local Environmental Plan 1998 (Amendment No. [X])	Development for the purposes of 'motels', 'serviced apartments', 'hotels', and 'restaurants', as defined by this plan, in addition to development for the purposes of 'function centres', as defined by the Standard Instrument (Local Environmental Plans) Order 2006.	Involving the construction of only 1 building.



Map: Randwick Local Map: Environmental Plan 1998 (Amendment No. [X])