

# Australian Turf Club

ROYAL  
RANDWICK

ROSEHILL  
GARDENS

CANTERBURY  
PARK

WARWICK  
FARM

10 April 2012



Christine Chapman  
Department of Planning and Infrastructure  
22-33 Bridge Street  
SYDNEY NSW 2000



Dear Christine,

## Objection to MP10\_0028 Remondis Integrated Recycling Park

### 1 Introduction

The Australian Turf Club Ltd (ATC) has prepared the following submission in response to the public exhibition of a Major Project Application for:

*"the construction and operation of an integrated Alternative Waste Treatment (AWT) facility to be known as the REMONDIS Integrated Recycling Park (RIRP) on a site at 1 Grand Avenue, Camellia."*

The Rosehill Gardens Racecourse is located approximately 150 metres to the south of the subject site and land also owned by the ATC is located 50 metres to the west of the site.

As land owner and operator of Rosehill Gardens Racecourse, the ATC has significant concerns regarding the proposed construction of a waste treatment facility in close proximity. These concerns can be summarised as follows:

- Social Impacts and Public Interest
- Potential impacts on the environmental sensitivity of the area, involving contamination.
- Increased traffic congestion and parking.
- Visual Impact and Amenity
- Real and perceived impacts of the proposed Waste Centre on future use of the site and surrounding area.

These concerns are addressed separately in greater detail below.

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## 2 Rosehill Gardens Racecourse

### 2.1 SITE AND CONTEXT

Rosehill Gardens Racecourse is a prominent and substantial landholding located on James Ruse Drive, Rosehill. The site covers an area of 55 hectares and is approximately 150 metres to the south of the proposed RIRP and 50 metres to the west, as shown in the map below.

FIGURE 1 – LOCALITY MAP





The Racecourse is a valuable open space resource hosting regular racing meetings throughout the year and accommodates regular non-racing events including conferences and entertainment events.

Together with the allotment of land occupied by the racecourse proper, the ATC own the allotments along James Ruse Drive, the northern section of which is only 50 metres from the site. The future use of the site is currently under investigation and it is noted that shops are currently permissible and other commercial/industrial uses, such as a registered club and hotel.

## 2.2 STRATEGIC CONTEXT OF THE SITE

Rosehill Gardens Racecourse is identified within both local and State government strategic documents. The *West Central Draft Subregional Strategy* identifies the Racecourse as a tourism attraction, recognising the significant use of the site for events.

The *Parramatta Economic Development Strategy 2011 – 2016* has the following vision for the site:

*'The Australian Turf Club will build a new hotel, registered club, refurbished grandstands and function rooms. They will be encouraged to make retail, food outlets, ATM and recreation facilities available to the peninsula workforce. The hotel will benefit from an improved vista following closure of the refinery.'*

The *Visitor Strategy for Parramatta 2011-2016* outlines Parramatta Council's vision for strengthening tourism in the Parramatta LGA. One of the key recommendations of the strategy is to *'Improve Amenity and Perception'*. As one of the key tourism attractions within the LGA, a waste treatment facility in close proximity to Rosehill Gardens Racecourse is not consistent with this strategy.

The ATC also wants to develop the site into a major events precinct on the gateway Rosehill Gardens site.

## 3 Discussion of Key Concerns

### 3.1 TRAFFIC AND PARKING

As detailed within the Environmental Assessment, the proposed waste facility will generate on average 288 movements daily with the majority (184) being heavy vehicle movements. Grand Avenue is already heavily congested with significant delays at key intersections and the introduction of such volumes of heavy vehicle traffic will exacerbate current congestion issues.

### 3.2 AMENITY AND VISUAL IMPACT

The ATC land immediately to the west of the site is zoned to accommodate open space, event, retail and commercial development with linkages to Camellia Rail Station. The close proximity of the waste treatment facility of a site that is set to house a new activity hub would introduce amenity impacts; many of which would be hard to mitigate against. To impacts such as odour and noise, the only complete solution would be that of separation and therefore the site is not considered suitable for the development.

### 3.3 SOCIAL IMPACTS AND PUBLIC INTEREST

As outlined in Section 7.7.9 of the EA, the following potential social impacts are associated with the operation of the proposed waste treatment facility by the wider community:

- Odours
- Noise
- Traffic
- Contamination
- Community health

This Section of the Environmental Assessment concludes:

*'In order to address the social impacts identified, a number of specific actions have been incorporated into the development and included in the draft Statement of Commitments.'*

Many of these draft commitments provide opportunities to have complaints investigated and allow for consultation however, it is not reasonable to approve a development in a location with the expectation that complaints will be generated. While attempts to minimise the environmental impacts are evident within the draft Statement of Commitments, a 24-hour waste treatment facility in close proximity to other significant activities will inevitably result in tensions with surrounding stakeholders and should be located in a more suitable environment or a site entirely surrounded by industrial development.

As the Rosehill Racecourse is a significant tourism attraction with strategic intentions for additional event, commercial, hotel, and/or residential land uses on the site, the real and perceived impacts of the proposed waste treatment facility will detrimentally impact upon the image of the racecourse and the future community in the surrounding area.

### 3.4 ENVIRONMENTALLY SENSITIVE NATURE OF THE SITE

The nature of the proposed development, including its construction, raises a number of significant environmental impact issues including:

- Exposure to asbestos currently under hardstand due to the need to provide services.
- Waste material, run off and the proximity to Parramatta River.
- Air Quality and Odour.

While the environmental assessment and technical reports highlight the above environmental concerns and seek to address them, we believe the justification is not adequate to provide confirmation that undue impacts would be avoided. The location of the site next to the Parramatta River, the Racecourse and other commercial land uses renders this issue very significant and worthy of great sensitivity.



#### 4 Conclusion

The Australian Turf Club strongly objects to the construction of a large-scale waste treatment facility in close proximity to Rosehill Gardens Racecourse and surrounding land holdings for the reasons detailed above and summarised below:

- The proposed nature of the development raises a wide range of environmental issues and the environmentally sensitive nature of the site renders the proposal inappropriate.
- The scale and nature of the operation will generate substantial additional traffic, particularly heavy vehicles. This will unreasonably contribute to the existing traffic congestion and delays at key intersections along James Ruse Drive and the surrounding road network.
- The proximity of the site to non-industrial uses will generate amenity conflict that cannot be adequately mitigated.
- The social impacts of the proposal are inadequately mitigated given the significant amount and variety of surrounding land uses including a major tourist attraction; Rosehill Racecourse

While the strategic importance of a waste management and recycling facility are understood and encouraged, such development would be better located on a site:

- That is without high environmental sensitivity.
- That has adequate access and road capacity.
- Away from significant tourism attractions.
- In the heart of an industrial area.

For the above reasons we request the proposal be refused.

**Yours sincerely,  
Australian Turf Club Limited**



**Mark Flanagan**  
Executive General Manager – Property Development