

3 November 2011

Director General
NSW Department of Planning and Infrastructure
23-33 Bridge Street
Sydney NSW 2000



Dear Sir,

MP10_0097 Spectator Precinct Royal Randwick Section 75W Application Non-indigenous Statement of Heritage Impact

This letter format Statement of Heritage Impact (SoHI) has been prepared to accompany a S75W application for proposed modifications to the approved development for the Royal Randwick Racecourse Spectator Precinct, MP10_0097.

The modifications proposed to the approved scheme are in response to further detailed review and design development that has been undertaken to capture efficiencies in form and function within the precinct. Additionally, it is proposed to amend Condition of Consent, C14.3 of the approval.

The amendments have been designed by Fitzpatrick + Partners, Architects, and Aspect Studios Landscape Architects. The modifications proposed to the approved scheme include:

- Reduction in the length and capacity of the grandstands
- Reduction in the size of the grandstand basement servicing area
- Redesign of the grandstand roof form
- Redesign of the internal layout of the grandstands
- Internal changes at the interface of the grandstand and the existing Officials Stand
- Deletion of the amenities building to the north and east of the existing day stables, and relocation adjacent to the new Parade Ring
- Slight reorientation and shape modifications to the new Parade Ring
- Pedestrian access ramp moved to the trackside of the QEII Grandstand
- Inclusion of a temporary landscape solution for the area adjacent to the Swab Building to allow the staged construction of works in this area

Site Identification and Heritage Management Framework

The subject site is part of the Spectator Precinct (defined on the Key Precincts map in the *Royal Randwick Racecourse Development Control Plan (DCP)*) of the Royal Randwick Racecourse and is part of the Racecourse Precinct Heritage Conservation Area, as shown on the *Randwick Local Environmental Plan (LEP) 1998* Heritage Map. The Official/Members Stand, is listed as an item of local heritage significance in the *Randwick LEP 1998*. Heritage items in the vicinity of the subject site include 10-12, 58 and 62-82 Doncaster Avenue, Kensington.

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Assessment of Heritage Impact

Graham Brooks and Associates prepared the *Royal Randwick Racecourse Spectator Precinct Statement of Heritage Impact* in September 2010 as part of the *Environmental Assessment* for this application. This report was prepared in consideration of the *Randwick LEP 1988*, the *Royal Randwick Racecourse DCP*, the *Draft Royal Randwick Conservation Management Plan* (Godden Mackay Logan 2006), and the *Spectator Precinct Royal Randwick Racecourse Specific Element Conservation Policy Draft Report* (Godden Mackay Logan 2007).

The report concluded that:

- The primary heritage significance of Royal Randwick Racecourse is its continued use as a racecourse since the first regular race meetings were held in 1863. The cultural landscape of the site has evolved continuously since the AJC's initial involvement with the site in the 1860s.
- The proposed new facilities will reinforce this significance and ensure the site's on-going use as a key Sydney recreational venue.
- The proposed development is consistent with the overriding aim of the Royal Randwick Racecourse Development Control Plan (DCP) which is to optimise the Royal Randwick Racecourse as a thoroughbred, racing, training and spectator facility of highest quality.

The amendments proposed to the grandstands, as part of this application, reduce the overall scale, bulk and form of these buildings, particularly as seen in relation to the Official/Member Stand. The September 2010 Heritage Impact Statement for the approved application notes the development provides a physical and visual separation to the front of the stands, thus improving the presentation of the historic Official/Members Stand and reinstating its presentation as an individual building. The works proposed as part of this application will further enhance this presentation and allow appreciation of its significance.

Graham Brooks and Associates Pty Ltd, has been involved in the detailed design of the interface connection between the heritage listed Official/Members Stand and the QEII Grandstand. The proposed interface solution reduces and refines the physical and visual impacts on the Official/Members Stand while allowing better access between both grandstands, and removing a dead end corridor. The improved connection between the two grandstands provides safer pedestrian access, improved visual connection between the two grandstands and a new equitable access point between the two grandstands.

The proposal also includes internal changes to the Official/Members Stand to improve access from the Epsom Bar Lounge Area to trackside. The loss of building fabric necessitated to reconfigure this space, to provide equitable access and improved pedestrian circulation, is considered to be a minor and is supported in the context of ensuring the continued use of the heritage item in conjunction with the new facilities. The proposed amendment also includes minor changes to the trackside facade of the Official/Members Stand and restoration of the last bay facade that was not well handled when the QEII Stand was originally constructed. As these will result in a better aesthetic resolution of the facades they are considered to be a positive heritage outcome.

The September 2010 Heritage Impact Statement notes the new built elements the Spectator Precinct are consistent with the design principles of the *Draft Royal Randwick Conservation Management Plan (CMP)* and the *Spectator Precinct Royal Randwick Racecourse Specific Element Conservation Policy Draft Report* for the following reasons:

- the proposal has been developed as part a co-ordinated plan to improve the functionality of the whole racecourse site
- the visual and functional relationship between the former paddock area and the track is reinforced with the enhanced viewing opportunities available from the new and modified grandstand

- the new buildings are distinctly new elements which do not mimic the characteristics of the earlier buildings in the precinct
- the new buildings continue the historic layering of the site's built environment, providing world class contemporary facilities to enhance the significance of the site as a premier racing and training facility
- the insertion of new structures within the Spectator Precinct has been minimised with the rebuilding of the existing Paddock Stand
- although they will be dominant components of the site the new buildings will not detract from the distinctive character and appearance of the existing buildings
- the significant presence of racehorses within the Precinct is to be reinstated and reinforced with the new Theatre of the Horse and its associated facilities
- views identified on Map 6 of the DCP are to be retained and enhanced

The proposed relocation of the new amenities building and the staff facilities, and the removal of the bar and tote facilities between the new parade ring and the grandstands, do not alter these outcomes.

The reorientation of the new Parade Ring will necessitate the relocation of a tree, as shown on the landscaping plans prepared by Aspect Studios. This tree is identified in the *Draft Royal Randwick CMP* as Landscape Element 21, an element of Exceptional Significance, and in the *Royal Randwick Racecourse DCP* as a Highly significant tree. The project arborist has advised that the tree is constrained by its existing enclosure will do better in the new location. Thus, the relocation of this tree is considered to be consistent with Policy 51 - Conservation of Significant Landscape Components of the *Draft Royal Randwick CMP* which notes that elements of Exceptional significance should be managed to prolong their safe and useful contribution to the landscape.

In general, the amended landscape plans respond to the proposed modifications to the design scheme and also allow staged landscaping works in the vicinity of the Swab Building, as the approved development for this building is to be a separate construction project.

As noted in the September 2010 Heritage Impact Statement the heritage listed dwellings in Doncaster Avenue, that are in the vicinity of the subject site, appear to have been listed for their architectural and aesthetic significance. Some of these houses have limited views to the buildings of the Spectator Precinct but this is not considered to contribute in any way to their heritage significance. It was concluded that the approved development of the Spectator Precinct, which may result in a change in built form viewed from these dwellings, will not have an adverse impact on their established heritage significance. The changes proposed in this amendment will not affect this outcome.

Amendment of Condition C14.3

The S75W application also requests the amendment of condition of consent C14.3 which currently states

'All construction contractors, subcontractors and personnel are to be inducted and informed by the nominated heritage consultant prior to commencing work on site as to their obligations and requirements in relation to historical archaeological sites and 'relics' in accordance with guidelines issued by the Heritage Council of NSW'.

It is proposed that this condition be amended to read:

The nominated heritage consultant is to prepare a set of Heritage Site Induction Guidelines and is to brief the Site Manager on their distribution and implementation.

This amendment is being sought in order to facilitate the most efficient and effective induction of site workers on their obligations and requirements in relation to historical archaeological sites and 'relics'. The Site Manager, who will be on-site on a full time basis, will be responsible for the overall Site Induction program. Graham Brooks and Associates Pty Ltd is preparing a set of Heritage Site Induction Guidelines and considers that the most effective implementation of these guidelines is their inclusion in the overall Site Induction program which will be undertaken by all personnel working on the site.

Conclusion and Recommendation

The proposed modifications to the approved scheme for MP10_0097, as a response to further design development, will have no unacceptable adverse impacts on the established heritage significance of the Spectator Precinct, the Official/Members Stand, the Racecourse Precinct Heritage Conservation Area or the heritage items in its vicinity.

The proposed amendment to Condition of Consent C14.3 will facilitate efficient and effective induction of site workers on their obligations and requirements in relation to historical archaeological sites and 'relics'.

Graham Brooks and Associates Pty Ltd is preparing a set of Heritage Site Induction Guidelines and considers that the most effective implementation of these guidelines is their inclusion in the overall Site Induction program which will be undertaken by all personnel working on the site.

Therefore Graham Brooks and Associates Pty Ltd supports the proposed amendments and recommends approval of the application.

Yours faithfully
GRAHAM BROOKS AND ASSOCIATES PTY LTD

A handwritten signature in dark ink, appearing to read 'G Lynch', is positioned above the printed name and title of the signatory.

Gail Lynch
Associate Director

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