

11 January 2012

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



Dear Sir,

MP10_0097 MOD 1
Spectator Precinct Royal Randwick
Section 75W Application
Response to Heritage Branch Comments

Graham Brooks and Associates prepared a letter format Statement of Heritage Impact (SoHI) to accompany a S75W application for proposed modifications to the approved development for the Royal Randwick Racecourse Spectator Precinct, MP10_0097 in November 2011. This SoHI concluded that 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 S75W application was referred to the Heritage Branch of the Office of Environment and Heritage and comments, dated 16/12/2011, were received from Mr Vincent Sicari. The following comments are provided as a response to the points raised in this correspondence, which have been reproduced in italics.

- *Reduction in the length and capacity of the grandstands, reduction in the extend of the trackside roof cantilever, reduction in the size of the cantilevered viewing deck, reduced scale of trackside amenities building to the south of the stand, reduced size and height of the pavilion building;*

A reduction in the overall scale, bulk and form of the new development reducing visual and physical impacts on heritage items is a positive outcome of the design review. However, the Heritage Branch is unable to comment on amendments to the design of individual buildings as the Heritage Impact Statement (that accompanied the Section 75W application) does not address, in any detail, these modifications.

Comment

The Royal Randwick Racecourse Spectator Precinct Heritage Impact Statement, prepared by Graham Brooks and Associates in September 2010, notes that the design of the approved new buildings is consistent with the design principles specified in Policy 73 of the Draft Royal Randwick Racecourse Conservation Management Plan (Godden, Mackay Logan, 2006) and Policies 10,12, 14, 15 and 16 of the Spectator Precinct Royal Randwick Racecourse Specific Elements Conservation Policy Draft Report (Godden, Mackay Logan, 2007) for the following reasons:

- the proposal has been developed as part a co-ordinated plan to improve the functionality of the whole racecourse site

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- 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

As noted previously, the design modifications proposed as part of this application do not alter these outcomes and 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.

- *Reduction in the size of the grandstand basement servicing area;*

This amendment comprises an internal modification to the new grandstand and does not have any impact on the significance of built heritage items.

Comment

Noted

- *Redesign of the internal layout of the grandstands;*

Modifications to the interior of the new grandstand will not impact on the significance of heritage items. The QEII grandstand is identified in the draft Conservation Management Plan (CMP) for the site, prepared by Godden Mackay Logan in 2006, as an item of moderate significance. The impact of proposed alterations to the interior of the building can be mitigated by archival recording of the proposed works. On this basis the Heritage Branch has no objection to the proposed internal modifications to the QEII Grandstand.

Comment

Noted

- *Internal changes at the interface of the Grandstand and the existing Official/Members Stand;*

Details of the design of the interface connection between the Official/Members Stand and the QEII Grandstand are not provided in the Heritage Impact Statement (HIS), therefore the Heritage Branch is unable to assess whether the design for the connection between the two structures is appropriate.

- *Changes to the Official/Members Grandstand to improve access from the Epsom Bar Lounge Area to trackside. This modification entails loss of building fabric;*

The HIS for the S75W modifications, does not provide a detailed description of the proposed works to the lounge area or an assessment of the significance of elements to be removed (i.e. the bar). The HIS prepared for the Official/Members Stand (dated November 2011) does address proposed changes to the Epsom Bar Lounge Area. However, the HIS does not provide an assessment of the significance of the fabric adversely impacted upon and there is no description or assessment of the proposed fit out of the bar area. The Heritage Branch is unable to provide comment on this proposal as the HIS does not provide sufficient detail for a full assessment of the proposal.

Comment

The internal changes at the interface of the Grandstand and the existing Official/Members Stand are limited to spaces currently configured for use as the Epsom Bar, Jockey's Room, Jockey's Waiting Room and Hall. These spaces have been subject to successive changes and most of the fabric to be removed, including the bar, appears to date from the 1990s refurbishment of the Official / Members Stand and is considered to be of relatively little significance.

Some original fabric will be lost with the partial removal of the painted English Bond masonry wall behind the Epsom Bar and the removal of the walls to the Jockey's Waiting Room. The double doors, with arched fanlight, between the Hall and the Jockey's Room are to be relocated.

As noted in the SoHI, the loss of building fabric necessitated to reconfigure this space, to provide equitable access and improved pedestrian circulation, is considered to be minor and is supported in the context of ensuring the continued use of the heritage item in conjunction with the new facilities.

- *Minor changes to the trackside façade of the Official/Members Stand and restoration of the last bay façade*

The Heritage Branch is unable to provide comment on this amendment as the HIS does not provide a description of the proposed modifications to the exterior of the building.

Comment

An existing doorway and two window openings in the trackside facade are to be widened to allow the insertion of new glazed doors and sidelights. A render lintel, matching that of other recent openings in the facade, is to be installed over the proposed openings and the new timber elements will match other infills found further along the facade. The proposed new elements will be clearly distinguishable from the original/early fabric of this building.

The approved separation between the Official/Members Stand and the QEII Stand will improve the poorly resolved connection of the two stands, allowing the Official/Members Stand to be read as a stand alone building. The conservation works will include a new exterior finish to the exposed end of the Official/Members Stand as an interpretation of the earlier form of the end wall. The design of the new element is based on a silhouette of the form found on the opposite end on the Official/Members Stand.

As noted in the SoHI, these changes will result in a better aesthetic resolution of the facades and are considered to be a positive heritage outcome.

- *Deletion of the amenities building on the north and east of the existing day stables, and relocation adjacent to the new Parade Ring;*

The Heritage Branch has no objection to the deletion of the proposed amenities buildings on the north and east of the existing day stables.

It is proposed that the amenities buildings be relocated along the north-west side of the Parade Ring with the Tramway Turnstile Building Complex to the north of the subject buildings. The Tramway Turnstile Building Complex is identified in the Draft CMP for the racecourse as being an item of exceptional significance. The HIS does not address whether the relocation of the amenities buildings will negatively impact on the setting of the item and views to and from this heritage building. This being the case, the Heritage Branch is unable to assess the impact of this amendment.

Comment

The Tramway Turnstile Building Complex is sited west of the Spectator Precinct. As it is set below the level of the spectator Precinct its roof is the only feature viewed from within the precinct. Current views from the bridge in front of the Tramway Turnstile Building include the Totalisator Building and the Randwick Pavilion. It is considered that the proposed relocation of the single storey amenities buildings will have no adverse impact on the setting of the Tramway Turnstile Building Complex, or on views to and from this building.

- *Modifications to the design and slight reorientation of the 'theatre of the horse' parade ring. This modification also entails the removal and relocation of a tree identified on the Draft Royal Randwick CMP as 'an element of exceptional significance' and in the Royal Randwick Racecourse DCP as 'a highly significant tree';*

In principle, the Heritage Branch does not object to the proposed changes to the parade ring. However, the HIS does not address whether the proposed amendment will impact upon the significance of the Tramway Turnstile Building Complex, located to the north of the ring or the Totalisator Building (assessed in the Draft CMP as being of high significance) located to the east of the ring. Therefore the Heritage Branch is unable to fully assess this amendment.

In regards to the removal and relocation of the tree which has been identified as having exceptional/high significance, the Heritage Branch accepts the comments of the project Arborist that the tree is constrained by its existing enclosure and will do better in the new location. The Heritage Branch does not object to the relocation of the tree. However, the HIS does not indicate where the tree is being relocated to therefore the Heritage Branch is unable to comment on the suitability of the new location. In relation to tree protection, consideration should be given to adopting applicable recommendations on page 12 of the Earthscape Horticultural Services Development Impact Assessment Report, dated September 2010, as specific consent conditions for the proposed development. The applicant should also be required to adhere to the guidelines in Section 7 'Protective Tree Zone' of the above report.

Comment

It is considered that there will be no additional heritage impact upon the significance of the Tramway Turnstile Building Complex, to the west of the parade ring, or the Totalisator Building, to its north, as a result of the proposed reorientation and design modifications to the approved parade ring.

The landscape plan submitted with this application shows the new location for this tree.

- *Pedestrian Tunnel Entry relocated to trackside;*

The HIS does not address the relocation of the Pedestrian Tunnel. However, it appears from drawing DA-24 Issue B that the tunnel runs in a roughly north-south direction under the new grandstands and has an access point adjacent to the south elevation of the QEII grandstand. The heritage impacts of this modification are likely to be acceptable.

Comment

It is considered that there will be no adverse heritage impacts resulting from the proposed relocation of the Pedestrian Tunnel Entry.

- *Inclusion of a temporary landscape solution for the area adjacent to the Swab Building to allow for the staged construction of works in this area;*

The Heritage Branch is unable to provide comment on this amendment as the HIS does not indicate what the 'temporary landscape solution' entails.

Comment

As noted in the SoHI, 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.

Summary 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 Local Environmental Plan 1988*, the *Royal Randwick Racecourse Development Control Plan*, 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 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*. 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 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.

Conclusion and Recommendation

As noted in the SoHI submitted with the S75W application, 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.

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', with a stylized, cursive script.

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