

3 February 2012

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



GRAHAM BROOKS
AND ASSOCIATES
ARCHITECTS
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HERITAGE
CONSULTANTS

Dear Sir,

MP10_0097 MOD 1
Spectator Precinct Royal Randwick
Section 75W Application
Response to Heritage Branch Comments of 30/1/2012

In November 2011 Graham Brooks and Associates prepared a letter format Statement of Heritage Impact (SoHI) to accompany the original S75W application for proposed modifications to the approved development for the Royal Randwick Racecourse Spectator Precinct, MP10_0097. 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. A written response to these comments, dated 11 January 2012, was prepared by Graham Brooks and Associates and submitted to the Department of Planning and Infrastructure. The following comments are provided as a response to the points raised in further correspondence from Mr Vincent Sicari, dated 30/01/2012. The Heritage Branch comments are reproduced in italics.

Modification

Reduction in the length and capacity of the grandstands, reduction in the extent 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;

As previously stated by the Heritage Branch, a reduction in the overall scale, bulk and form of the new development, reducing the visual and physical impacts on heritage items, is a positive outcome of the design review.

The Heritage Branch notes Graham Brooks and Associates' comment that the design of the approved new buildings is consistent with the design principles specified in Policy 73 of the Draft Royal and Randwick Racecourse Conservation Management Plan by Godden Mackay Logan dated 2006 and policies 10, 12, 14, 15 and 16 of the Spectator Precinct Royal Randwick Racecourse Specific Elements Conservation Policy Draft Report by Godden Mackay Logan dated 2007, and that the design modifications do not alter this outcome.

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However, the Heritage Branch is unable to comment in detail on amendments to the design of individual structures as neither the Heritage Impact Statement (HIS) for the Section 75W application nor the additional information supplied on 11 January 2012 addresses, in any detail, these modifications.

In terms of the physical and visual separation to the front of the QEII and Official/Members Stand, the Heritage Branch is of the opinion that the modification to the approved design scheme does not generate any significant additional visual impact on the heritage item. It is however recommended, that materials used to clad the east wing of the QEII building (which abutts the Official/Members Stand), be coloured in dark tones to lessen the visual impact of these works. The design of the interface connection between the heritage-listed Official/Members Stand is discussed below.

Comment

The Heritage Branch notes the design review has resulted in a positive heritage outcome.

It is unclear what the Heritage Branch comment, underlined above, regarding the design of individual structures, is referring to. The new building elements are distinctly new elements which do not mimic the characteristics of the earlier buildings in the Spectator Precinct. They 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 Heritage Branch recommendation that materials used to clad the east wing of the QEII building be coloured in dark tones to lessen the visual impact of these works is noted. The architectural design statement submitted with the S75W application states the external skin of the Paddock and QEII stands are to be wrapped in a timber skin to their sides and northern elevation with a performance glass facade located to the inside edge of the balconies behind this skin. It explains the objective of this approach, using a warm palette of materials as a porous skin over a cooler base, is to create visual depth and reduce the visual bulk and mass. Graham Brooks and Associates considers the high quality of the design and the materials selected are consistent with the Heritage Branch recommendation.

Modification

Internal changes at the interface of the Grandstand and the existing Official/Members Stand and changes to the Official/Members Grandstand to improve access from the Epsom Bar Lounge Area to trackside;

The additional information provided by Graham Brooks and Associates, indicates that proposed internal changes at the interface of the Grandstand and the existing Official/Members Stand, is limited to spaces currently configured for use as the Epsom Bar, Jockey's Room and Jockey's Waiting Room and Hall. According to the information provided these spaces have been subject to successive changes and most of the fabric to be removed appears to date from the 1990s refurbishment of the Grandstand. The proposal entails the removal of English Bond masonry walls from behind the Epsom Bar and walls to the Jockey's Waiting Room. The double door, with arched fanlight, between the Hall and Jockey's Room, is also being removed but will be relocated elsewhere in the building. No details of the proposed fitout of the Epsom Bar have been provided.

The Heritage Branch does not object to the removal of fabric dating from the 1990s. However the Branch is of the opinion that the complete removal of the English Bond masonry walls is not consistent with policy 38 of the draft Royal Randwick Racecourse Conservation Management Plan prepared by Godden Mackay Logan in 2006. Alternative design schemes that retain sections of all the walls, to allow for interpretation of the original layout, should be considered. The original function of the rooms should be clearly interpreted as part of the internal works. The Heritage Branch recommends that consideration is given to including the following specific consent conditions, in relation to the proposed works to the Official/Members Stand:

- *The applicant shall provide a detail design of the proposed modifications to Officials/Members Stand to the Heritage Council for approval prior to the commencement of works on the building;*
- *A schedule of works for the Official/Members Stand be approved by the NSW Heritage Council, prior to the commencement of works on the building.*

Should the Director-General of Planning and Infrastructure approve removal of original masonry, The Heritage Branch recommends that the applicant be required to carefully remove the brickwork and store the bricks in a secure location on site, to allow for the possibility of later reinstatement or future conservation works.

Comment

No part of the Royal Randwick Racecourse site is listed on the State Heritage Register. A 2006 nomination to consider the inclusion of the Racecourse site on the State Heritage Register, made to what was then the NSW Heritage Office, by a third party, has not been proceeded with.

There is no legislative requirement to seek approval from the NSW Heritage Council for any works to this building. As such it is not appropriate that the conditions recommended above be included in the approval of this application.

The Royal Randwick Racecourse site is part of the Randwick Racecourse Conservation Area, identified on the Heritage Map that forms part of the *Randwick Local Environmental Plan (LEP) 1998 (Consolidation)*. The Official/Members Stand is listed in Schedule 3 of the *Randwick LEP 1998 (Consolidation)* as a heritage item of local significance.

Although the *Draft Royal Randwick Racecourse Conservation Management Plan*, prepared by Godden Mackay Logan in 2006 is an unendorsed document, which has no statutory standing, it has been used to guide the resolution of the design for these modifications.

Policy 38 of the Draft Conservation Management Plan and its explanatory text are:

Policy 38 - Evidence and Reversibility

Where significant early elements or fabric are removed, evidence of their location and/or character in situ should be retained where possible to allow interpretation. Where significant elements or fabric are able to be removed and stored for later reinstatement, their location (in situ) should be recorded and the items catalogued and stored safely for possible replacement or relocation.

Explanatory Text

This policy seeks to ensure that significant evidence of the form and layout and detailing of the place is retained as far as possible when adaption/change is carried out. Where for example, new openings are required in original/early walls, nibs and/or arched around the new opening provide evidence of the previous layout. Original doors or windows may also be able to be retained and fixed closed (to accommodate new layouts or uses) in a manner which allows ready reversibility.

The submitted plans show nibs are to be retained at either end of the wall that is to be removed, to allow its interpretation. This is consistent with this policy and is considered to be standard industry practice.

It should be noted that if minor modifications for functionality are not allowed to be made to this building its use will deteriorate and it will no longer be an active contributing element in the Spectator Precinct, which is an essential aspect of its significance. Changes have been made over the decades as the building has responded to progressive amendments in its functional demands. These changes are generally regarded as not having a negative effect on the essential heritage significance. The current changes fit within this evolutionary framework.

Modification

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

The Heritage Branch is of the opinion that the proposed modification to openings in façade of the Official/Members Stand are not consistent with policy 73 (point 2) of the draft Royal Randwick Racecourse Conservation Management Plan prepared by Godden Mackay Logan in 2006 and represent incremental negative impacts on the significance of the item.

Alternative design options should be sought and provided to the Heritage Council for approval. To this end, the Heritage Branch recommends inclusion of the above conditions of consent in any approval of the proposed design scheme.

Should the Director-General of Planning and Infrastructure approve the proposed modifications, the applicant should be required to carefully remove original fabric such as bricks, architraves, windows and doors and store the material in a secure location on site, to allow for the possibility of future reinstatement of these elements.

In regards to the restoration of the last bay of the façade and end wall of the Stand, while in principle the Heritage Branch does not object to the proposed work, insufficient detail has been provided to fully assess the proposed works. It is recommended that as a condition of consent the applicant be required to provide a detail design of these elements, to the NSW Heritage Council for approval prior to the commencement of the work. This recommendation could be implemented through the inclusion of a conditions of consent recommended above.

Comment

The unendorsed 2006 *Draft Royal Randwick Racecourse Conservation Management Plan*, which has no statutory standing, has been used to guide the resolution of the design for these modifications.

Point 2 of Policy 73 - Design Principles referred to in the Heritage Branch correspondence is

Change to significant buildings and structures, such as alteration of their external form, appearance and detail, should be minimised except where it involves removal of intrusive components

The proposed development is considered to be consistent with this policy. The impact of the facade modification has been minimised by locating the openings where there are existing openings, and the design of the new entry door sets which are in keeping with those further along the facade, which themselves do not appear to be original.

The windows and doors to be removed can be salvaged, catalogued and stored for possible future replacement or relocation. A condition of consent, to that effect, could be included in the approval of this application.

As noted above, if minor modifications for functionality are not allowed to be made to this building its use will deteriorate and it will no longer be an active contributing element in the Spectator Precinct, which is an essential aspect of its significance.

There is no legislative requirement for NSW Heritage Council approval to be sought for any works to this building. Therefore is not appropriate that the recommended condition above be included in the approval of this application.

Graham Brooks and Associates has been appointed as the nominated Heritage Consultant for the construction phase of this project and will review the detailed design of these elements with the project architects.

Modification***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 had no objection to the deletion of the proposed amenities building on the north and east of the existing day stables. In regards to the relocation of the amenities building along the north-west side of the parade ring, it was noted that the HIS did not address how this modification would affect the Tramway Turnstile Complex (which has been identified in the draft CMP for the racecourse as being an item of exceptional significance). Additional information provided by Graham Brooks & Associates indicates that the subject building is set below the level of the Spectator Precinct with only its roof visible from within the precinct. However, there is a view corridor between the bridge in front of the Tramway Turnstile Building and the Totalisator Building (assessed in the draft CMP as being of high significance).

The proposed relocation of the amenities buildings to the north-west of the parade ring appears to impact upon the view corridor between bridge and the Totalisator building. It is recommended that consideration be given to repositioning the subject buildings closer to the outer edge of the ring to reduce the intrusion of these buildings into this view corridor.

Comment

The Draft Conservation Management does not identify a specific view corridor between the bridge in front of Tramway Turnstile Building and the Totalisator building.

Figure 5.2 of the Draft Conservation Management Plan identifies 'Important Historic Views' associated with the racecourse. The only view associated with the Tramway Turnstile Building identified on this map is the view to and from the Tea House Building, which is to be removed as part of the approved development.

Policy 60 of the Draft Conservation Management Plan notes four former significant historic views that should be reinstated, or interpreted, where possible. These are:

1. From Cowper Street, Alison Road and Wansey Road into the racecourse before boundary planting and solid fencing obscured views;
2. From the Flat to the north to the racing and training tracks and to the grandstands;
3. Within and from the former Tramway/Busway Area; and
4. To the former Totalisator Building, now obscured by the Randwick Pavilion.

View 1 has been improved in changes that have been made to the Alison Road fencing since the Draft Conservation Management Plan was prepared. The approved removal of the Randwick Pavilion will reinstate View 4. The photomontage that was submitted with this application (Drawing DA-57), is View 3. It shows that the existing relationship between the Tramway Turnstile Building and the Totalisator Building is not interrupted by the relocation of the amenities buildings.

The reasons given by the Heritage Branch to support the recommendation to reposition the amenities buildings are not valid.

Conclusions and Recommendation

As stated in our previous correspondence:

- 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 and most of the buildings of the site have evolved progressively since 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 modifications to the approved scheme for MP10_0097, as a response to further design development, are 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 design modifications proposed as part of this application 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 built fabric at Royal Randwick Racecourse has been continuously upgraded to meet contemporary requirements since the facilities were established in the 1860s. If minor modifications are not permitted to be made to the Official / Members Stand to facilitate its ongoing use within the Spectator Precinct its functionality within this precinct will be severely constrained. If it cannot function as an integral part of the Spectator Precinct this building will become redundant. Thus, it is essential to its long term survival that this historic building remains in use.

No part of the Royal Randwick Racecourse site is listed on the State Heritage Register. As such, there is no legislative requirement to seek approval from the NSW Heritage Council for any works to the Official / Members Stand. Therefore, it is not appropriate that the Heritage Branch recommendation for further referral of this application to the Heritage Council be included in the conditions of consent for the approval of this application.

Graham Brooks and Associates Pty Ltd supports the proposed amendments and recommends approval of this S75W application with a condition that early windows and doors removed are salvaged, catalogued and stored for possible future replacement or relocation.

Yours faithfully

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