

5 November 2012

The Director General
NSW Planning & Infrastructure
23-33 Bridge Street
Sydney NSW 2000



Dear Sir

Proposed Royal Randwick Racecourse Hotel SSD 5002-2011 Preferred Project Report Statement of Heritage Impact

This Statement of Heritage Impact has been prepared to accompany the Preferred Project Report (PPR) for State Significant Development (SSD) 5002-2011, the Royal Randwick Hotel.

Graham Brooks and Associates Pty Ltd prepared a Statement of Heritage Impact in May 2012 for submission with the project application. The proposal has been revised in response to submissions received during the public exhibition period. The revisions include changes to the building parapet, stair cores, finishes and signage.

This letter format report discusses the heritage related issues raised in correspondence from the Department of Planning and Infrastructure (DPI), dated 17 September 2012, in the context of the design revisions. The DPI comments are noted below in bold italics.

Bulk and Scale

Consideration should [be] given to the following issues:

- ***the dominance of the proposed building within its historic setting and the need for the proposal to support and be sympathetic to the historic significance of the Racecourse site***

Urban Design

The design of the proposed building should be reconsidered to better achieve a 'landmark building' reflecting the cultural and historic significance of the Royal Randwick Racecourse and the contextual setting of the building.

The proposed development is located within the Racecourse Precinct Heritage Conservation Area, and is adjacent to the Official / Members Stand, listed as an individual heritage item of local significance in the *Randwick Local Environmental Plan (LEP) 1998*, and the former Turnstile building, identified in the *Royal Randwick Racecourse Development Control Plan (DCP)* as an element of High significance. It is some distance from the other significant elements of the Spectator Precinct, the former Swab and Totalisator Buildings.

The defining element in the Racecourse Precinct Heritage Conservation Area is the Royal Randwick Racecourse (RRR). The primary significance of RRR is that it is Sydney's oldest and longest continually operating racecourse.

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It should be noted that the former Turnstile Building is effectively a wall which formerly had openings to facilitate public entry and small enclosures to shelter ticket sellers. It would be expected that any built element in the vicinity of this structure would be higher than the wall.

Although the proposed development will be a new landmark element at the Alison Road frontage of the RRR site, it will not visually dominate the Racecourse Precinct Heritage Conservation Area given the extensive size and largely open nature of the conservation area and the varied development within it.

The view analysis in the *Royal Randwick Racecourse Hotel Statement of Heritage Impact*, prepared by Graham Brooks and Associates in May 2012 (SoHI), is reproduced in Attachment 1 of this report. The view analysis shows the new development has been sited and designed so it will not obstruct views to and from the adjacent Official / Members Stand, or important historic views within and to the racecourse.

It includes an image (labelled as View F) showing the Official / Members Stand between the refurbished Queen Elizabeth II Stand (currently under construction) and the proposed Hotel development, viewed from the Infield. The SoHI notes the proposed setbacks from the existing structures of the Official / Members Stand and the former Turnstile Building retain an appropriate setting for these structures. The Spectator Precinct entrance has recently been refurbished to be a predominantly open space that facilitates the movement of large crowds in and out of the site. When viewed in the context of the approved development of the Spectator Precinct that is currently under construction it is unlikely that the spectator entrance will be dominated by the proposed Hotel building.

Signage

- ***An assessment of the proposed signage against relevant sections of the NSW Heritage Office's (now Branch) publication 'Statements of Heritage Impact' should be provided.***

The signage, proposed as part of the Project application, includes internally illuminated identification signage at roof level on the north and south elevations of the building, the car park entrance and the main entrance to the hotel, within the Royal Randwick Racecourse site. The PPR signage has been revised to reduce and relocate the roof level signage and to include site identification signage on Alison Road. This has been designed to replicate the dimensions and colour palette of the former Turnstile building and to frame the hotel building.

The subject site is part of the Racecourse Precinct Heritage Conservation Area, as shown on the *Randwick LEP 1998* and the *Draft Randwick LEP 2012* maps, and is in the vicinity of the Members Stand (Official Stand), listed as an item of local heritage significance in the *Randwick LEP 1998* and the *Draft Randwick LEP 2012*. The Statements of Heritage Impact publication contains a series of criteria for the assessment of heritage impact. The relevant questions to be answered for new signage are addressed below.

How has the impact of the new signage on the heritage significance of the item been minimised?

Response

The impact of the new signage on the heritage significance of the Racecourse Precinct Heritage Conservation Area has been minimised by separating the 'Royal Randwick' site identification sign, and the 'Adina' hotel sign. This reinforces the primary importance of the racecourse site.

Have alternative signage forms been considered (eg Free standing or shingle signs). Why were they rejected?

Response

The applicant considers illuminated signage to be essential to ensure the commercial success of this development. Free standing or shingle signs are not considered to be appropriate for this use.

Is the signage in accordance with section 6, 'Areas of Heritage Significance', in Outdoor advertising: An Urban Design-Based Approach? How?

Response

The objectives of 'Category 6; Areas of heritage significance' in this publication are

- *Outdoor advertising should be designed and located in a manner which conserves the heritage places which have been identified as significant; protecting and enhancing what is valued about the building or the place.*

The revised signage proposal has two components proposed; the 'Adina' signage is to be located on new, infill hotel building, not on any site components of exceptional or high significance. The specific guidelines for signage, in this publication, are applicable to signage on listed heritage buildings, not infill buildings such as the proposed hotel.

The primary heritage significance of the Royal Randwick Racecourse is its continued use as a racecourse since the first regular meetings were held in 1863. This is respected in the design of the new street level signage that incorporates the well known 'Royal Randwick' logo. The proposed signage is considered to be consistent with objectives of Category 6.

Will the signage visually dominate the heritage item/heritage conservation area or heritage streetscape?

Response

The following image shows a view from the Infield of the proposed hotel, in relation to the adjacent heritage item, the Official / Members Stand, with the location of one of the roof top signs outlined in red.

The proposed signage is an integral part of the building and will not, in itself, visually dominate the Racecourse Heritage Precinct Conservation Area, or the adjacent Official / Members Stand.



Figure 1: View from the Infield of the proposed hotel, in relation to the adjacent heritage item, the Official / Members Stand, with the location of one of the roof top signs outlined in red

Can the sign be remotely rather than internally illuminated?

Response

While internally illuminated signage may not be appropriate on some listed heritage buildings this is not the case for this application. As the proposed signage is for a new built element of contemporary design internal illumination is considered to be acceptable.

Additional Information: Significance of the Stewards Towers, path and planting

Further information regarding the historical significance of the following structures/features;

- **further detail including a description and history of the second Stewards' Tower, proposed for removal;**
- **the existing path and associated planting adjacent to Alison Road**

Volume 2 of the *Draft Royal Randwick Racecourse Conservation Management Plan (the Draft CMP)*, prepared by Godden Mackay Logan in December 2006 contains the following comments in relation to the Stewards' Towers that it grades as being of Little heritage significance:

There are numerous stewards' towers located around the outside of the course proper. These are typically steel framed with steep dog-leg stairs leading to a small enclosed booth on the top level. Their walls and roof are clad with colorbond.

A stewards' tower located in the spectator area is of contemporary style, constructed 2003. It has two viewing platforms, enclosed with glazing. Accessed via steep external dog-leg stair. Designed by Swanbury Penglase Architects.

The towers play an important role in the functioning of the racecourse on race days and contribute to than overall understanding of how the racecourse operates.

The 2003 Stewards' Tower, noted above, is one of the two towers proposed for demolition as part of this application. There is little historical information available relating to the second Stewards Tower. The Australian Turf Club (ATC) has advised that it was likely to have been erected around the same time as the Kensington track was built in the 1960's. This is confirmed by comparison of the photographs in Figures 2 and 3 that shows the stewards' tower that is to be demolished was not present in 1967.



Figure 2:
Photograph showing the two stewards' towers to be demolished, with the 2003 structure on the left and the post 1967 structure on the right

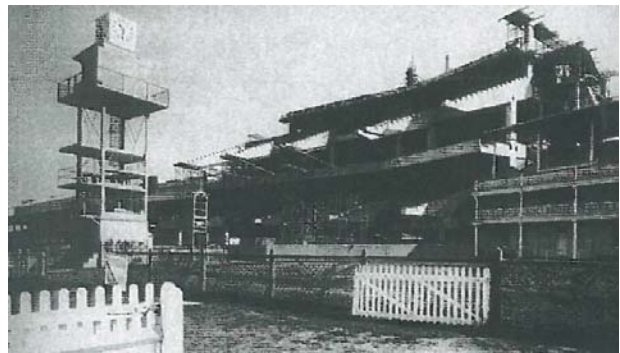


Figure 3:
1967 photograph showing the Stewards' Tower in this location at this time is not the one that is present today

The *Draft CMP* grades all of the buildings, and structures, plantings and other and landscape features within the racecourse site in accordance with the guidelines endorsed by the NSW Heritage Council. The site components are graded as Exceptional, High, Moderate, Little or Intrusive. The Stewards' Towers are graded as being of Little significance. It is widely accepted heritage practice that elements of a heritage place that make little contribution to its significance can be removed.

To construct the new facilities it is essential that the two Stewards' Towers be demolished. Given their limited contribution to the significance of the Racecourse Precinct Heritage Conservation Area there is no valid heritage argument to compel the retention of these items.

Additional Information: Interpretation Panels

- ***details of the proposed interpretation panels to the Turnstile building, including how they relate to the Godden Mackay Logan Conservation Management Plan, what information is to be displayed.***

The *Draft CMP* contains the following relevant policies for Site Interpretation:

Policy 20 - Interpretation Requirements Generally

Measures to appropriately interpret the major aspects of the significance of the Royal Randwick Racecourse site should be incorporated into any conservation and development proposals for the site as a whole.

Policy 21 - Interpretation Through conservation Works

Preservation, restoration and reconstruction of significant individual components are the preferred methods of meaningfully interpreting important attributes and associations of the Royal Randwick Racecourse site. Where adaptation is part of the conservation work, measures should be incorporated to show the location, character and/or role of removed or altered components where appropriate.

Policy 22 - Interpretation as Part of New Development

Appropriate measures to interpret the history and significance of the Royal Randwick Racecourse site as a whole should be incorporated into any future development proposals for the site.

Godden Mackay Logan prepared the *Royal Randwick Racecourse Interpretation Plan Phase 1 Strategic Overview* report in 2009. Section 6.2 of this Interpretation Plan notes "The original function of the former Turnstile Building at Gate 6 could be interpreted through a trompe l'oeil painting scheme for the surviving elements of ticket windows, numbers and doors to visually interpret its original function.

The interpretation panels proposed in this application are considered to be consistent with the overall strategy for the site. Details of the proposal, including the images to be displayed, is to be yet to be prepared. It is therefore recommended that the project approval include a condition of consent requiring this information be provided to the DPI before the issue of a Construction Certificate.

Additional Information: Significance of the Landscape

- ***a Landscape Impact Statement prepared by a suitably qualified professional assessing the historic significance of the site's previous and existing landscaping schemes.***

As noted above, the *Draft CMP* includes an analysis of the significance of the plantings and other and landscape features within the racecourse site, in accordance with the guidelines endorsed by the NSW Heritage Council. The site components are graded as Exceptional, High, Moderate, Little or Intrusive.

The *Draft CMP* notes that the Port Jackson Fig to be removed, L45, makes an exceptional contribution to the site and has historic and aesthetic values. There are no other elements of the subject site identified in the *Draft CMP* as having notable heritage significance. This is confirmed in the series of aerial photographs included as Attachment 2 of this report that show there has been little in the way of formal landscaping in the subject site until recent years.

The existing paving and garden area at the rear of the Oaks Marquee, which has a circular focal point, dates from the 1980s. The landscape feature previously contained a memorial to Phar Lap. The memorial was removed from the site in mid 2011 to facilitate vehicular access to this part of the site.

This landscape feature is considered to be of Little significance. The memorial is a movable heritage item of high significance. It is to be installed in a new location as part of the site interpretation required as a condition of consent for the development of the Spectator Precinct that is currently under construction.

It is proposed to remove tree L45 and tree L43 to enable the construction of the proposed hotel. The project Arboricultural and Horticultural Consultants, TLC Tree Solutions, have considered the relocation of this tree and are of the opinion that in the longer term these values can best be retained with a replacement tree. As the *Draft CMP* notes the Silky Oak, L43, is a relatively recent planting and that it makes little contribution to the site its removal is considered acceptable, from a heritage perspective.

Conclusions

Following a review of the plans prepared for the Preferred Project Report for Royal Randwick Hotel Graham Brooks and Associates concludes:

- The subject site is part of the Spectator Precinct of Royal Randwick Racecourse.
- It is part of the Racecourse Precinct Heritage Conservation Area which is shown on the *Randwick LEP 1998* Heritage Map and the *Draft Randwick LEP 2012* Heritage Maps.
- It is adjacent to the Official Stand, listed as an item of local heritage significance in the *Randwick LEP 1998* and *Draft Randwick LEP 2012*, and in the vicinity of Centennial Park, a heritage item of state significance, and the North Randwick Heritage Conservation Area, a heritage item of local significance.
- The primary heritage significance of Royal Randwick Racecourse is its continued use as a racecourse since the first regular meetings were held in 1863. The cultural landscape of the site has evolved continuously since the AJC's initial involvement with the site in 1860s.
- The proposed new hotel is part of a strategy to implement a diverse range of facilities to ensure the financial sustainability of the racing function of the site. As such, it supports and enhances the significance of the Royal Randwick Racecourse site.
- The simple form and contemporary design of the new outdoor bar structure is considered to be a sympathetic addition to the Racecourse Precinct Heritage Conservation Area.
- The proposed development provides complementary new facilities that are compatible with the functions and significance of the Royal Randwick Racecourse. It will not have an adverse impact on any existing functional and visual relationships within the Spectator Precinct, or the wider site.
- Although the new addition will be a new landmark element at the Alison Road frontage of the RRR site, it will not visually dominate the Racecourse Precinct Heritage Conservation Area given the extensive size and largely open nature of the conservation area and the varied development within it.
- It is considered to be a sympathetic addition to the Racecourse Conservation Area as it incorporates an area of the Spectator Precinct that currently has very limited use into the functionality of the Spectator Precinct, and activates the space adjacent to the former Turnstile Building, enhancing opportunities to appreciate the significance and function of this building.

- The proposed development is consistent with the requirements and guidelines of the *Randwick LEP 1998*, the *Draft Randwick LEP 2012*, the *Royal Randwick Racecourse DCP*, the *Draft Royal Randwick Racecourse Conservation Management Plan 2006* and the *Spectator Precinct Royal Randwick Racecourse Specific Element Conservation Policy Draft Report*.

Recommendation

Graham Brooks and Associates recommends the PPR be approved, subject to the following conditions:

- The Port Jackson Fig trees, L41 and L42, are to be adequately protected during the construction works, to mitigate any potential impacts.
- A Schedule of Conservation Works for the former Turnstile Building is to be prepared, by an experienced Heritage Consultant, to guide the proposed works to this building.
- Details of interpretation that is to be installed in the former Turnstile Building are to be provided to the DPI before the issue of a Construction Certificate.

Yours faithfully

GRAHAM BROOKS AND ASSOCIATES PTY LTD



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Attachment 1: Extract from the *Royal Randwick Racecourse Hotel Statement of Heritage Impact*, prepared by Graham Brooks and Associates in May 2012.

View Analysis

The following images prepared by as part of the Visual Analysis for this application show the proposed development in relation to the significant elements within the Royal Randwick Racecourse site. These have been used to inform the Assessment of Heritage Impact.

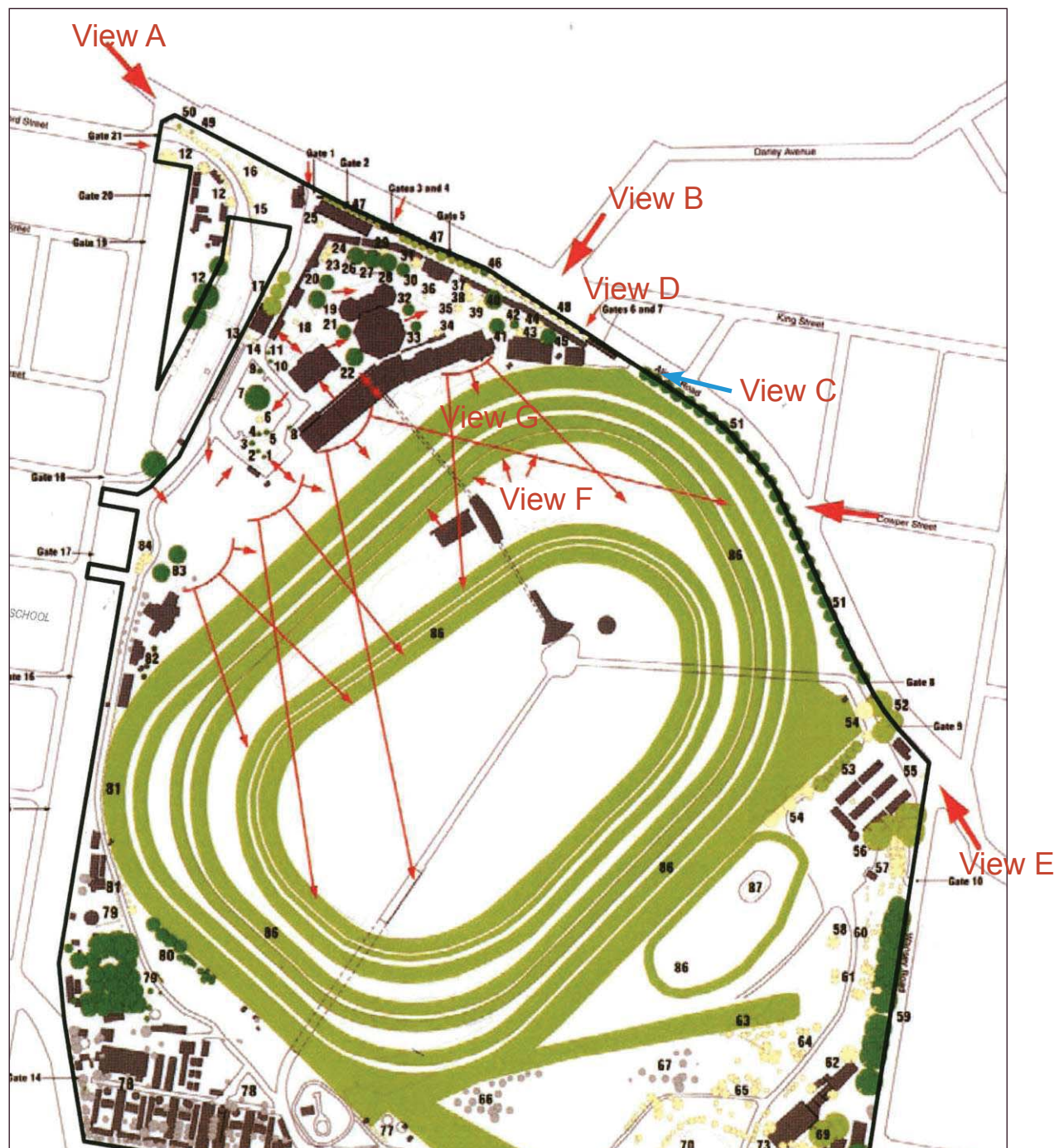


Figure 6.1
Extract from Map 4 of the DCP showing the Historic Views considered in this report labelled from A to G

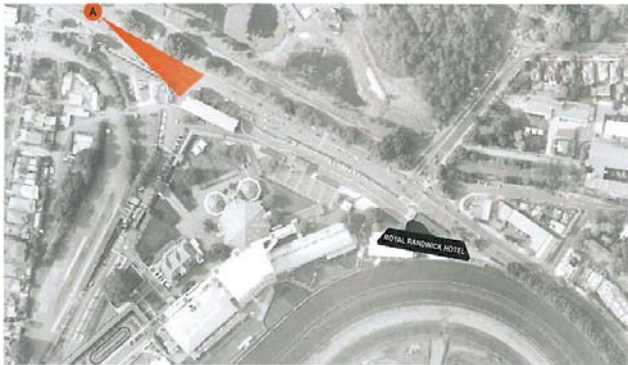
Source: *Royal Randwick Racecourse DCP*

View A

Images illustrating the change in View A, identified in the *Draft CMP* as historic view 01, the view to the site from the west along Alison Road.



Camera Position A : Alison Road Traveling East | Before



Camera Position A: Alison Road Traveling East | After

Figure 6.2

Images illustrating the change in View A, view to the site from west along Alison Road, identified in the *Draft CMP* as View. 01

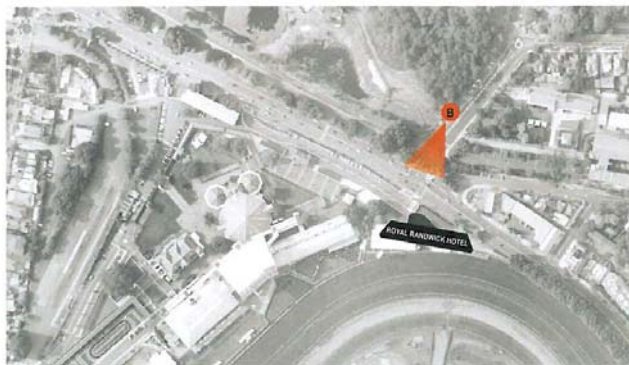
Source: Tonkin Zulaikha Greer Architects

View B

Images illustrating the change in View B, identified in the *Draft CMP* as historic view 04, the view to the site from Darley Road.



Camera Position B : Darley Road | Before



Camera Position B : Darley Road | After

Figure 6.3
Images illustrating the change in View B, view to the site from Darley Road, identified in the *Draft CMP* as View. 04

Source: Tonkin Zulaikha Greer Architects

Views C and D

The *Royal Randwick Racecourse DCP* identifies the view into the racecourse site through the gates at Gate 6 and 7 (View D) as being of importance. It is likely that this significance was attributed because it was the only view of the track available from this part of Alison Road at the time the *Draft CMP* and *Royal Randwick Racecourse DCP* were prepared. Until 2008 the RRR site was enclosed with solid fencing, obscuring views from the public domain. The replacement of this fencing has allowed extensive views to the track and the Spectator Precinct from Alison Road, to the east of Gate as 6 and 7.

The current View D, shown in Figures 6.4 and 6.5, is a partially obscured view to the race track. Therefore, the impact on views into the Royal Randwick Racecourse from east of Gates 6 and 7 have been analysed instead of this location. This is referenced as View C.

The comparative images of View C show these views will not be impacted by the proposed development.



Figure 6.4
Partial view to the race track currently available through Gate 6/7



Figure 6.5
Views through Gates 6/7 towards the Spectator Precinct buildings are obscured by the Oaks Marquee



Camera Position C : Alison Road Travelling West| Before



Camera Position C : Alison Road Travelling West| After

Figure 6.6
Images illustrating the change in View C

Source: Tonkin Zulaikha Greer Architects

View E

The photograph below shows the subject site is not seen from View E, identified in the *Draft CMP* as historic view 02, the view to the site from the east along Alison Road.



Figure 6.7
Photograph showing View E

View F

The image below shows the proposed development as seen in View F, identified in the *Draft CMP* as the view from the Infield to the Official Members Stand and Gate 6/7.



View G

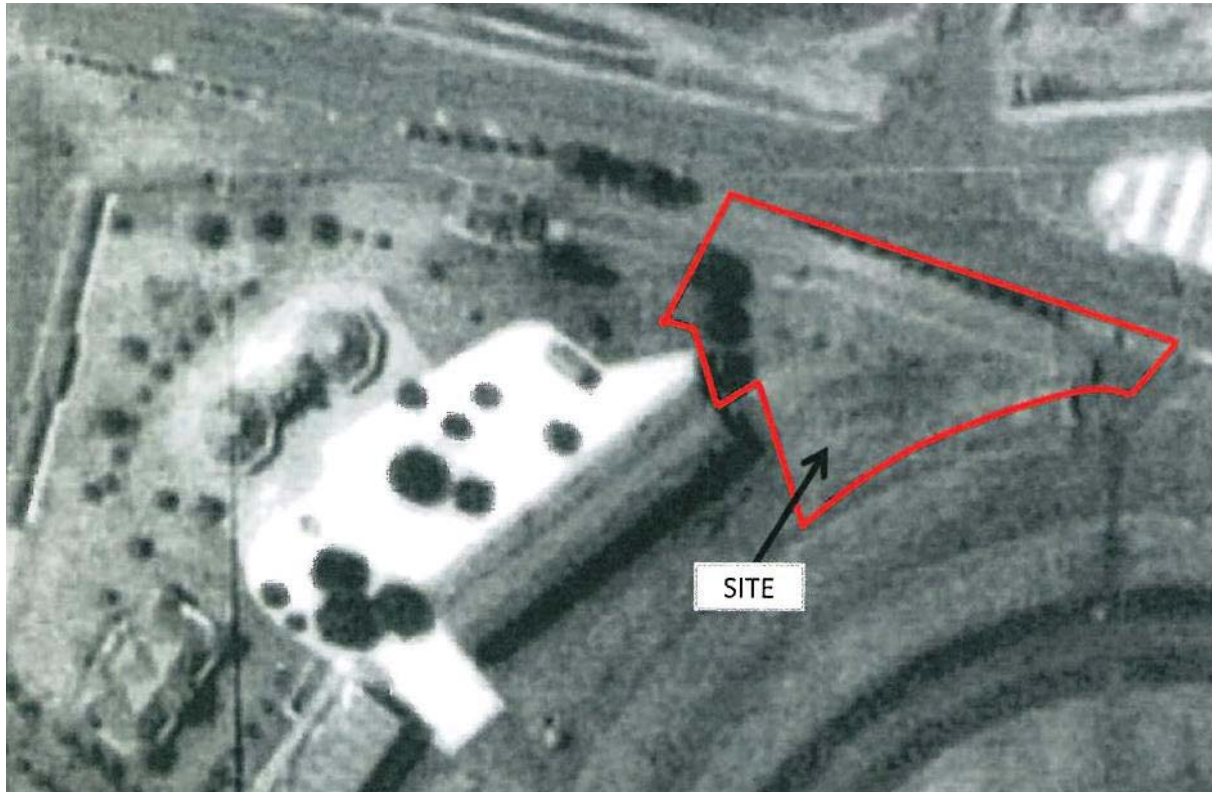
The *Royal Randwick Racecourse DCP* identifies the view from within the northern part of the Official / Members Stand to the Racetrack and Infield as being of importance. The photographs below show the Oaks Marquee in the location of the subject site. The new hotel and trackside bar proposed for this location will not obscure these historic views of the racetrack.



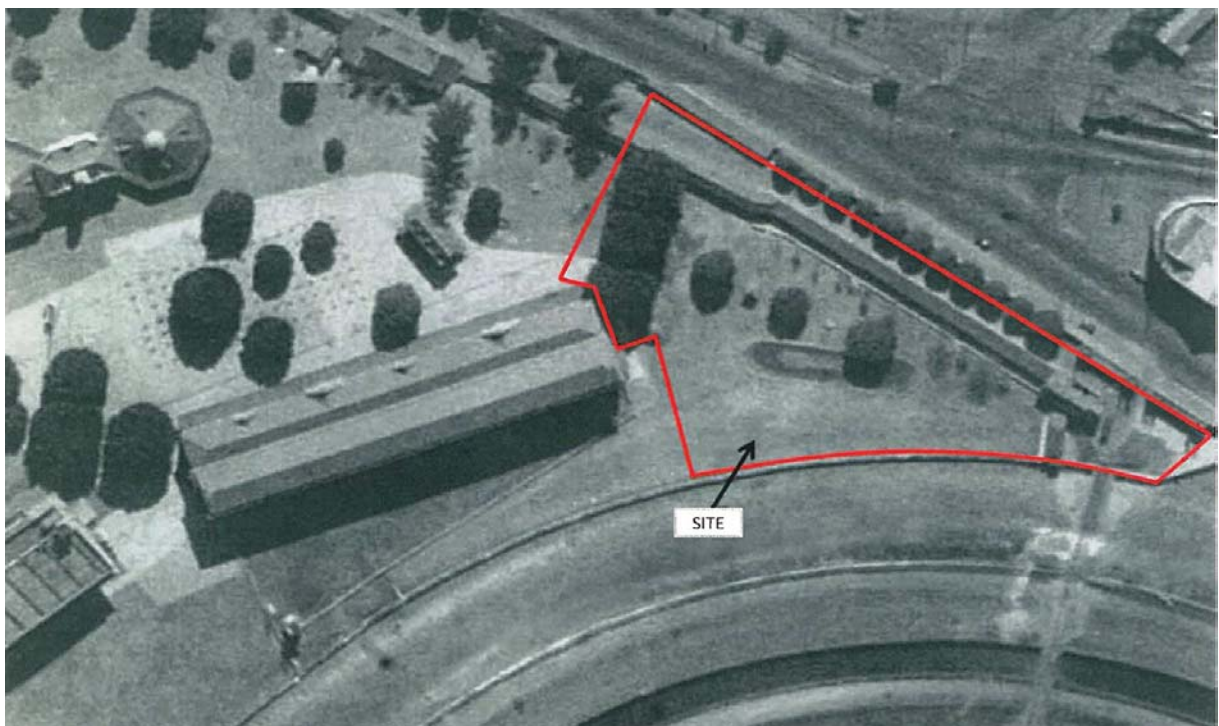
Figures 6.9 and 6.10
Images showing View G, from inside the Official / Members Stand in to the race track, will not be obscured by the proposed development to its north

Attachment 2: Aerial photographs of the subject site

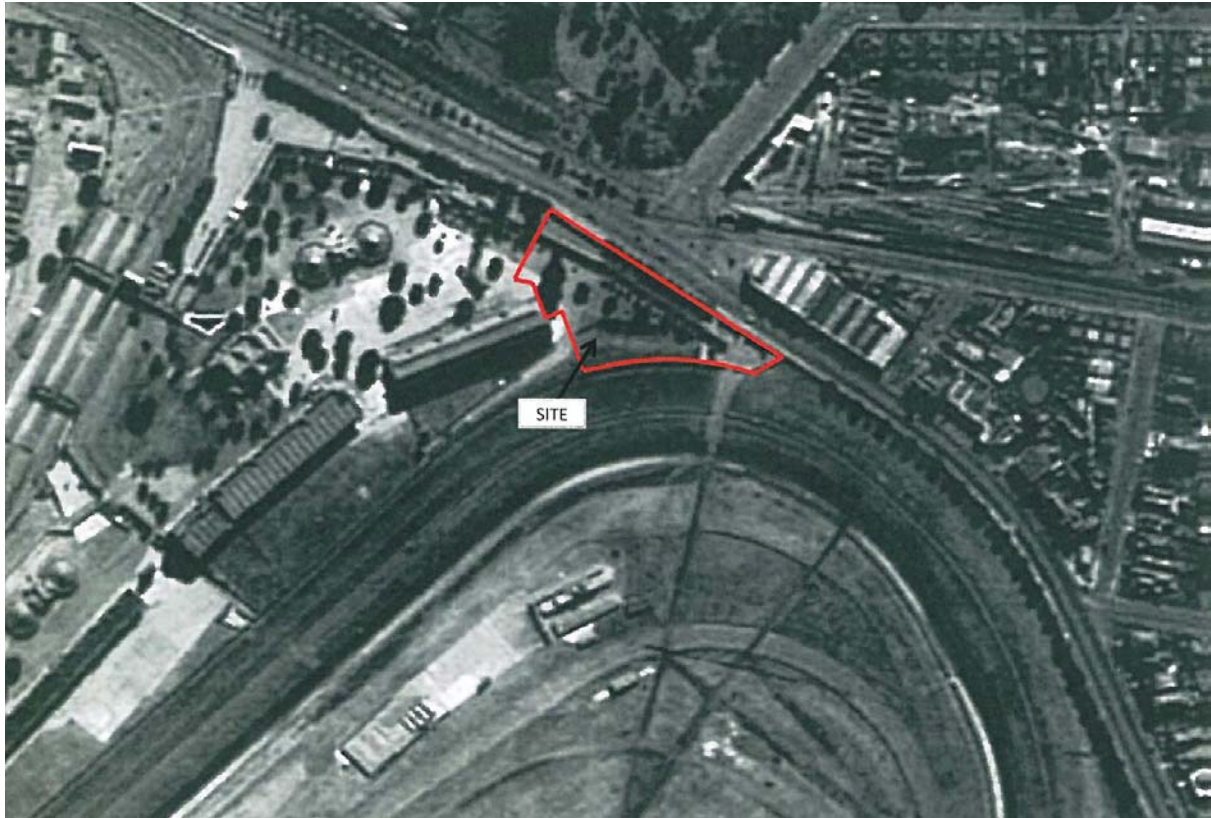
The following aerial photographs of the subject site have been provided by Douglas Partners



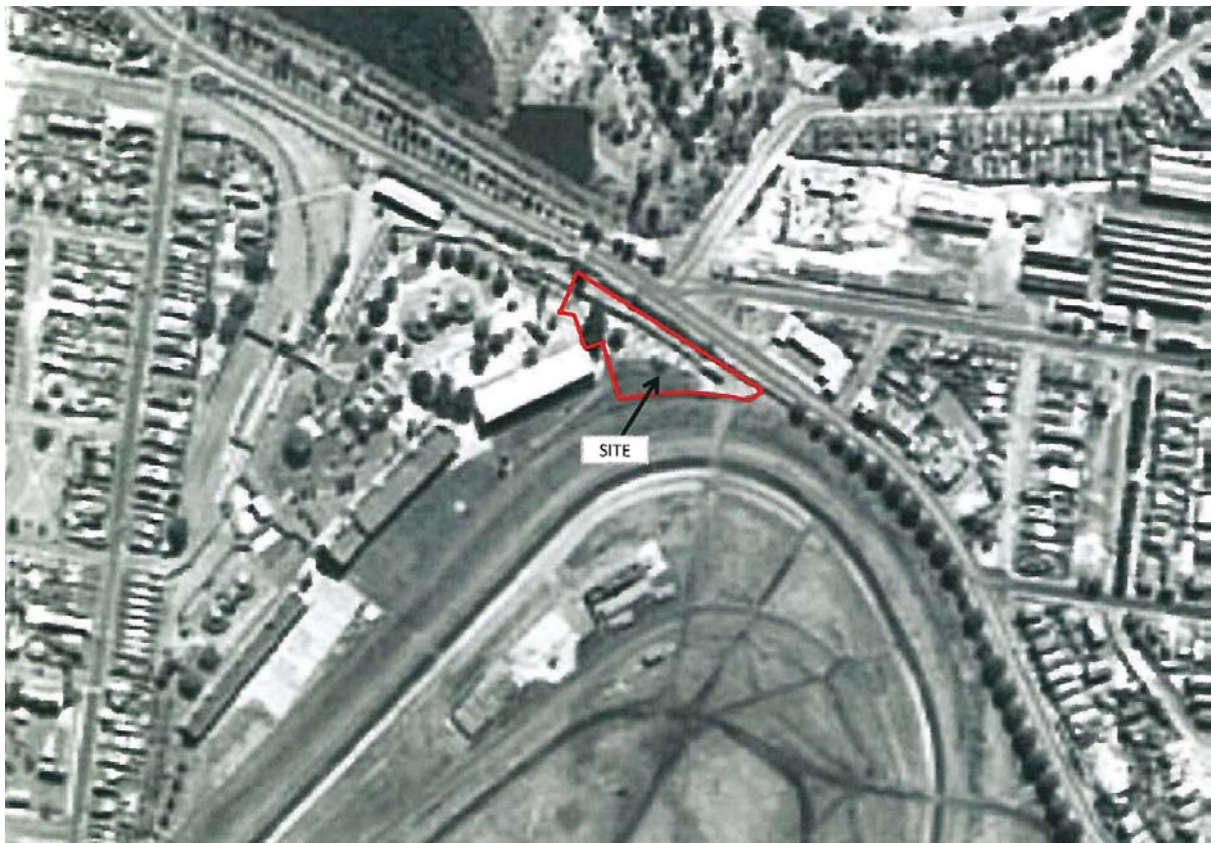
1930



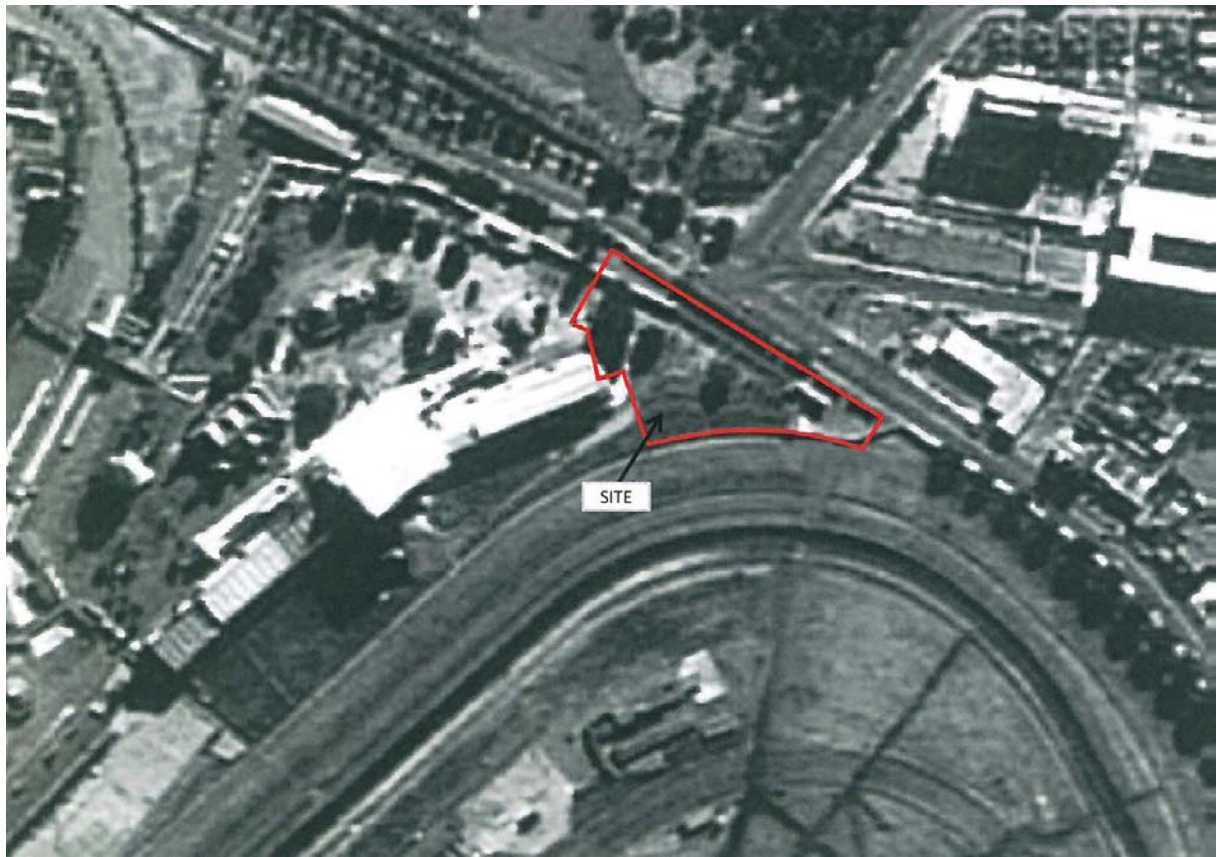
1943



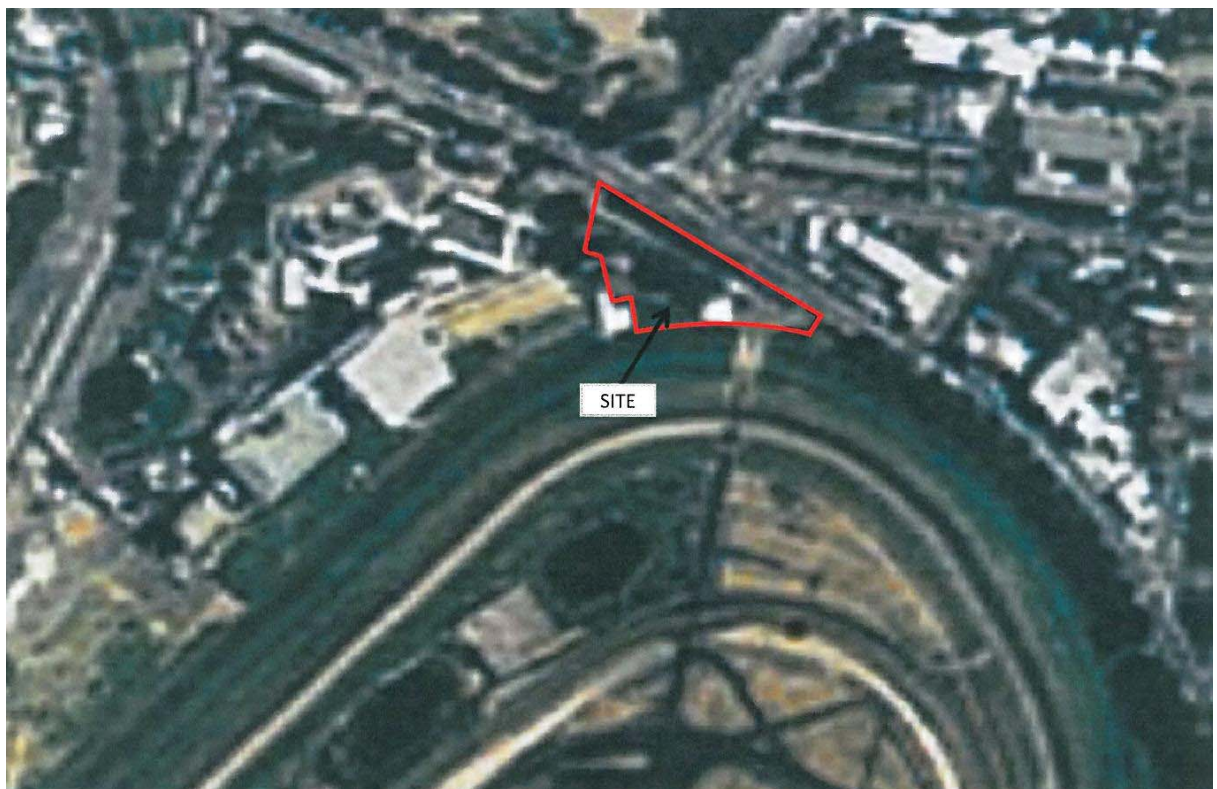
1951



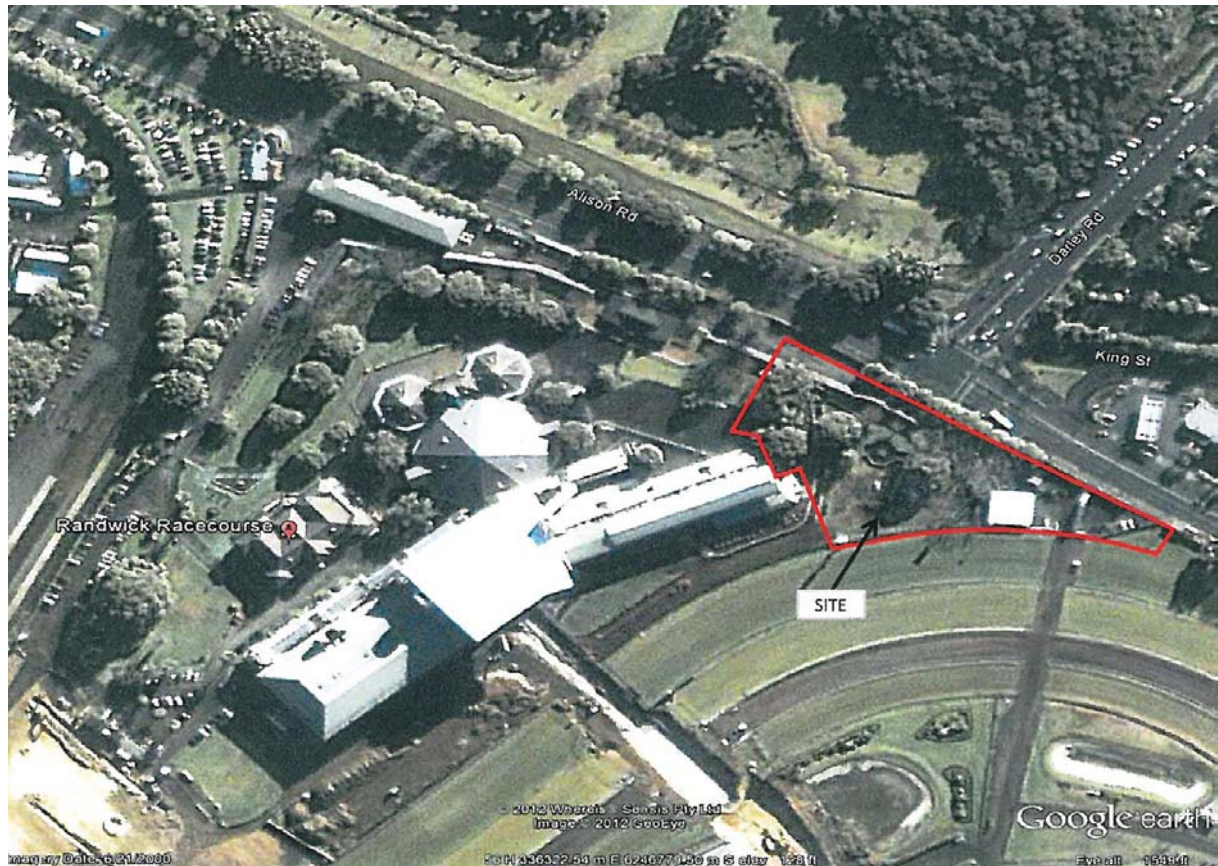
1965



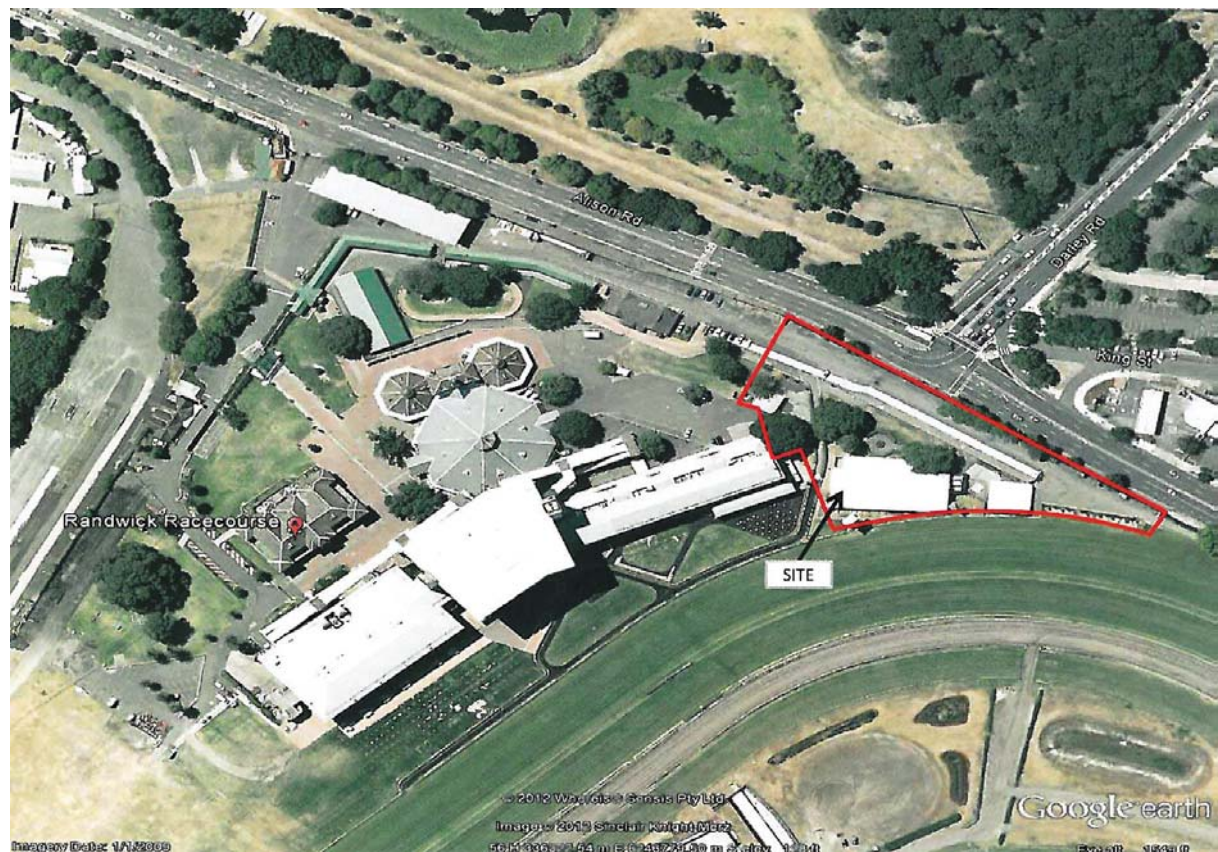
1970



1994



2000



2008