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File: 10/11198
Your Ref: SSD-5002-2011

Attention: Ms Caroline Owen

RE: Application to amend Schedule 2 of the Randwick Local Environmental Plan 1988 (SSD 5002-2011)

Thank you for providing the Heritage Branch with the opportunity to comment, on behalf of the Heritage Council, on the proposed amendment of Schedule 2 of the *Randwick Local Environmental Plan 1998* to allow motels, serviced apartments, hotels and function centres as additional permitted uses on the Royal Randwick Racecourse site.

While the Royal Randwick Racecourse site has not yet been added to the *State Heritage Register*, the item has been identified as having State heritage significance by the State Heritage Register Committee. The Committee is responsible for recommending the listing of items on the *State Heritage Register* to the Minister and contains members of the NSW Heritage Council.

The Racecourse comprises a range of racecourse functions and is set within an extensive cultural landscape. Royal Randwick Racecourse is a place of State significance, as metropolitan Sydney's oldest and longest continually-operating racecourse. It has unique historic, associative, aesthetic and social links to the development of horseracing in Sydney and New South Wales. It is a unique cultural landscape with landmark qualities and a distinctive architectural composition that reflects a traditional approach to racecourse design and development, serviced by substantial public transport infrastructure.

The built environment is set within a cultural landscape of formal gardens, lawns and cultural plantings that visually connect the racecourse to the extensive parklands of Centennial Park, and in turn act to reinforce the historical connection of the racecourse to a major band of regional open spaces that incorporates part of the once large Sydney Common area set aside by Governor Macquarie for the recreational use of the people of Sydney.

The historical and social significance of the Royal Randwick Racecourse site extends to the potentially high Aboriginal archaeological values which may be retained in the southeast corner of the racecourse site. It includes diverse, but less potentially significant, historical archaeological remains across the site.

Randwick Racecourse is also adjacent to, or in the vicinity of a number of heritage items including Centennial Parklands (comprising Centennial Park, Moore Park and Queens Park); 'Walsworth' at 25 Doncaster Avenue, Kensington; Kensington Public School Buildings;

Doncaster Hotel; Masonic Temple; Old Tote/Fig Tree Theatre and associated trees within the University of New South Wales.

In relation to the proposed amendment to the *Randwick Local Environmental Plan (LEP) 1998* instrument, the Heritage Branch makes the following comments:

A Final Draft Conservation Management Plan (CMP) has previously been prepared for the subject site by Godden Mackay Logan in December 2006. It is recommended that the Applicant be required to update this document in light of recent developments at the site. The proposed amendment to the LEP should be then be guided and informed by the updated CMP to determine whether the subject site can accommodate the development which could ensue from this proposed amendment to the instrument.

In the absence of an updated CMP, consideration of potential, future development should take into account the constraints and opportunities arising from the identified heritage values of the site and its setting noted in section 6.0 of the Final Draft CMP prepared by Godden Mackay Logan in December 2006. In particular:

- The retention of important physical components and spatial and functional relationships that have always been part of 'a day at the races' for the ordinary race-goer/punter;
- The ability of the racecourse to clearly demonstrate the essential nature of its major functional relationships between key components
- The landmark qualities of the racecourse in its carefully planned landscape and layout, particularly the size of the open spaces, its perimeter plantings and the relationship with Centennial Park on the opposite side of Alison Road;
- The individual landscape components and spaces that contribute to the 'park like' visual qualities and amenity of the racecourse;
- The potentially high Aboriginal archaeological values that may be retained in the southeast corner of the racecourse site.

In relation to the above, the Heritage Branch, on behalf of the Heritage Council, also recommends consideration of view, vistas and visual relationships to, from and in-between buildings, structures, open spaces and surrounding lands.

Section 7.8.1 of the CMP relates to new uses and development of the site. Consideration should be given as to whether the proposed amendment, which allows for development of motels, hotels, function centres etc can be accommodated on the site in light of the design principles detailed in this section of the CMP. In particular:

- The significant physical, functional and visual relationships between groups or complexes of heritage landscapes and buildings should be retained;
- New building should support and enhance the heritage significance of the Royal Randwick Racecourse site;
- New building should not dominate the existing, significant character and historic layering of the racecourse and the evidence of significant functional relationships, associations and non-tangible values of the racecourse;

- The erection new buildings and structures should retain an appropriate curtilage or setting for the existing building and/or surrounding heritage buildings and landscape components.

In addition to the above, the following design principle should also be considered:

- Transitioning the scale of any new built forms (i.e. by virtue of height and bulk) to ensure the new development compliments the form, character and setting of existing significant buildings, structures and open spaces.

In regards to the proposed new use, section 7.4.2 of the CMP states under policy 30 that the Royal Randwick Racecourse site may be used for purposes other than horse racing provided that the use is compatible with the conservation of its significant individual components and their significant functional relationships and with the site's relationship to its surrounding context, in particular Centennial Park.

Any assessment of the proposed amendment should also consider whether the future development envisioned by the amendment, is likely to conflict with heritage provisions of the Randwick LEP and the *Royal Randwick Racecourse Development Control Plan (DCP) 2007*. For example, Section 2.4 Site Vision and Framework: 'Desired Future Character,' of the Royal Randwick Racecourse DCP, highlights the need to conserve the significant built and landscape components of the site. Section 3.2 of the same document, Heritage Objectives, requires that any proposed new development enhances and contributes to the heritage significance of the site and its setting.

The objectives of the Heritage Provisions of the Randwick LEP 1998 are noted below:

- to conserve the environmental heritage of Randwick City;
- to conserve the heritage significance of heritage items and heritage conservation areas including associated fabric, settings and views;
- to conserve known or potential archaeological sites; and
- to conserve places of Aboriginal heritage significance.

It is noted that the *Randwick Draft Local Environmental Plan 2012* has similar objectives.

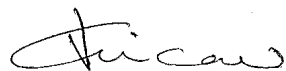
The Branch would also like to take the opportunity to recommend that once the CMP is updated, the Department and Randwick City Council consider developing further the existing DCP (guided by the CMP) to establish more prescriptive and detailed built form controls by virtue of the height, bulk, setbacks and scale of new development.

The Heritage Branch also recommends that a Heritage Impact Statement (HIS) be prepared and accompany any future Development Applications for the site. The HIS would provide further detailed heritage assessment on the suitability of the proposed development and the potential for heritage impacts on the cultural significance of the Royal Randwick Racecourse site.

Accordingly, in light of the above comments, the Heritage Branch recommends that the CMP for the site be revised and updated as necessary, to reflect contemporary changes to the precinct. The CMP should then be used as the basis for guiding and informing the further development of this proposed amendment.

I trust this information is of assistance. If you have any further enquiries regarding this matter, please contact Tracy Appel on (02) 9873 8559.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sicari', with a stylized flourish at the end.

03/09/2012

Vincent Sicari

Manager

Conservation Team

Heritage Branch, Environment and Heritage, Policy and Programs Group

Office of Environment & Heritage

DELEGATE OF THE HERITAGE COUNCIL