



Mr Alan Bright
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File: 10/11198
Your ref: SSD – 5002-2011

Attention: Caroline Owen

Dear Mr Bright

RE: Australian Turf Club SSD 5002-11 Application for Hotel

Thank you for your letter dated 30 July 2012 inviting submissions regarding the Australian Turf Clubs application for a hotel located at the Royal Randwick Racecourse. While Royal Randwick Racecourse 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 Heritage Branch provides the following comments on behalf of the NSW Heritage Council.

The Branch understands that the proposed scheme comprises the following:

- Partial demolition of Alison Road Boundary fence;
- Demolition of the brick toilet block adjacent to the Alison Road entrance, Oaks Marquee and two Stewards' Towers located against the racetrack;
- Construction of the an 8 storey hotel building comprising a 170 bedroom hotel, bar, restaurant, swimming pool, ancillary conference facilities and basement parking for 50 cars;
- Landscaping and public domain works including the construction of a concrete terrace behind the former Entrance Turnstile, removal of two trees and re-alignment of the fencing at the northern edge of the Members Lawn;
- Construction of new outdoor bar facilities adjacent to the Official's stand;
- Conservation and reuse of former Entrance Turnstile (gates 6 & 7) including partial removal of brick infills and installation of interpretation panels;
- Business identification signage.

The Branch notes that the site is located at the northern end of the Spectator Precinct in the immediate vicinity of the Official's Stand which has been graded as being of exceptional significance in the Final Draft Conservation Management Plan (CMP) prepared by Godden Mackay Logan in 2006 and the Former Entrance Turnstile for gates 6 & 7 (graded in the CMP as being of high significance). The proposed development site is also in the vicinity of

the Swab Building (high significance), Totalisator Building (high significance) and the course proper.

The Heritage Branch understands that the Race Day Stalls and the Former 2000m Entrance Turnstile Building, located in this area of the site have since been removed.

In relation to the assessment of the subject proposal, the Heritage Branch draws the Department's attention to the Branch's comments regarding the proposed amendments to the *Randwick Local Environment Plan 1998* to allow motels, serviced apartments, hotels and function centres as additional permitted uses on the Racecourse. Additional comment on the subject development proposal is provided below.

Archaeology

The Branch notes the advice, provide in the Aboriginal Heritage and Historical Archaeology Preliminary Assessment, prepared by AHIMS in May 2012, which concludes that no further Aboriginal or Historical archaeological investigation or assessment is required in advance of the proposed development. In relation to the historical archaeology the Branch concurs with this assessment. Comment in relation to the Aboriginal archaeology should be obtained from the former Regulation and Enforcement Unit of the former Department of Environment, Climate Change and Water now part of the Office of Environment and Heritage.

The Heritage Branch recommends the following archaeological conditions be included in any approval:

- The Applicant must ensure that if substantial intact archaeological deposits and/or State significant relics, not identified in historical archaeology preliminary assessment prepared by AHIMS in May 2012 are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery;
- Should any Aboriginal 'objects' be uncovered by the work, excavation or disturbance of the area is to stop immediately and the Office of Environment and Heritage must be informed accordance with Section 89A of the National Parks and Wildlife Act, 1974 (as amended). Works affecting Aboriginal 'objects' on the site must not continue until the Office of Environment and Heritage has been informed. Aboriginal 'objects' must be managed in accordance with the *National Parks and Wildlife Act, 1974*.

Demolition of built items

According to the Heritage Impact Statement (HIS) none of the items to be demolition have been identified as a significant element in the CMP. The Alison Road boundary fencing to be removed was constructed 2008. The Oaks Marquee is a temporary facility erected post 2000. The Stewards' Tower was constructed in 2003 and the toilet block to be demolished is a contemporary element which is not referenced in the CMP. The Heritage Branch does not have any objections to the removal of these items.

In regards to the second Stewards' Tower, while the Heritage Branch notes that the HIS states that this item is graded as having little significance, the HIS does not appear to contain any further description or history for this item. It is suggested that the Department seek further information about the Tower.

Conservation work to Former Entrance Turnstile

The former Entrance Turnstile (gates 6 & 7) is to undergo conservation works including replacement of missing doors to the former ticket booths. The openings of the pedestrian entry ways, which are currently bricked up, are to be partially reinstated to allow interpretation of their function. The Heritage Branch regards these works as a positive

conservation action and concurs with the recommendation of the HIS that a schedule of conservation works for the building should be prepared. It is recommended that the Department include the following condition of approval in any consent for the project:

- A schedule of conservation works for the former Entrance Turnstile (gates 6 & 7) is to be prepared by a suitably qualified and experienced heritage practitioner. The schedule of conservation works is to be provided to the Heritage Council or its delegate for approval prior to the works commencing.

In relation to the proposal that interpretative panels replace the brick infills to the pedestrian entry of the Turnstile, it is noted that there is an overview interpretation strategy for the site prepared by Godden Mackay Logan and revised by Graham Books and Associates. It is suggested that the Department seek clarification in regards to how the interpretation panels integrate into the overall interpretation strategy for the site. More detail should be sought as to what textual and visual content is to be included on the panels.

The Branch draws the Department's attention to the DCP Performance Criteria 3.2 Heritage Conservation, subsection f, which states that "An interpretation Plan for the site is to be developed and implemented prior to any major development."

Landscape Works

The proposal affects four trees located either in close vicinity or within the construction area for the proposed development, T41, T42, T43, and T45. Trees T41, T42 and T45 are graded in the CMP as being of exceptional significance. Tree T43 is graded in the CMP as being of little significance. The Arborist's report states that T41 will be minimally affected by the proposed works. Tree T42 is located in close proximity to the work zone and the tree's canopy will require pruning.

Trees T43 and T45 are within the work zone and it is proposed that they be removed. In terms of relocating the trees proposed for removal, the Arborist's report states that Tree T43 is unsuitable for transplanting. T45 could be transplanted. The Applicant is proposing that the trees be removed and that T45 be replaced with a mature specimen of the same species. Given the exceptional nature of tree T45, the Heritage Branch's preference is that the tree T45 be transplanted to a suitable location on site. The Heritage Branch does not object to the removal of tree T43. It is recommended that the Department include the following conditions of approval in regards trees T41, T42 and T45:

- A suitably qualified Arborist should be appointed to oversee the management and monitoring of the trees. The project Arborist should have experience in working on heritage sites;
- Trees 41 and 42 are to be managed and monitored according to the proposed Tree Management Plan included in Appendix 1 of the report prepared by TLC Tree Solutions dated May 2012;
- The project Arborist should prepare a statement outlining the proposed methodology for removal and replanting of the T45;
- Prior to commencement of transplantation, the contractor shall provide certification to the project Arborist and the Department of Planning and Infrastructure, that all transplant machinery and equipment entering the site is completely clean and free of any foreign matter, such as soil, plants from other sites, and that no transplanting of other plants has been undertaken in recent weeks;
- The transplantation contractor shall establish, to the satisfaction of the project

Arborist, on-site facilities for sterilising transplant machinery and equipment, such as containers and solution for sterilising equipment such as saws and secateurs, to be cleaned before working with the tree;

- All pruning shall be kept to an absolute minimum and is to be carried out under the supervision of the project Arborist in accordance with the Australian Standard for Pruning of Amenity Trees and the Tree Management Plan;
- Supplementary irrigation and fertilizing is to be provided for the 24 month Establishment Period following transplantation;
- It is recommended that periodic (e.g. monthly) monitoring of the trees be undertaken by the project Arborist over a 24 month period;
- A tree protection bond (the Bond) for trees T41, T42 and T45 must be lodged by the Applicant with the Department of Planning and Infrastructure for the sum of \$150,000 prior to work commencing at the site. The Bond shall be held on trust by the Department. Within twenty-four (24) months of the date of this approval, the Applicant must submit a condition survey of the trees prepared by the nominated horticulturalist. The condition survey must include certification that all works have been completed in accordance with the approved methodology. If, in the reasonable opinion of the Department, the trees are damaged or their health compromised, the Bond shall be forfeited to the Department. The Department will use the forfeited Bond to cover the cost of their treatment or appropriate like-for-like replacement as deemed necessary by the Department. The Bond will be released to the Applicant if the following conditions have been met: the project Arborist and Department approves that the trees, once replanted, are in good health and condition.

It is noted from aerial photographs, of the proposed development site, that adjacent to the Alison Street boundary of subject area, running parallel to the road, is a hard surface path with a circular focal point. The outer edges of the path are formed by formal plantings. Clarification should be sought from the Applicant as to whether this landscape feature is still present on site, and if so what is its significance. If the item is determined to be of exceptional, high or moderate significance, it should be retained or the Applicant should be asked to demonstrate why the landscape feature cannot be retained or adaptively reused in the design scheme.

In terms of the landscaping generally, it is unclear how the proposed design relates to past landscape schemes on this site. It is recommended that the Department consider requesting a Landscape Impact Statement. The Statement should consider original or early layout(s), plantings, lawn areas and the extent of shrubbery and, trees. It should assess the significance of any landscape features within the development site and provide policies for the removal, retention and/or adaptive reuse of landscape elements. The Statement should also discuss how the proposed landscape scheme makes a connection to the 'place' and how it retains significant aspects of the layout of the site and significant elements. All relevant questions under 'New landscape works and features' in the Heritage Office's (now Branch) publication *Statements of Heritage Impact* should be addressed. The Branch recommends the following condition be included in any approval for the subject development:

- A suitably qualified Landscape Consultant, with experience working on heritage sites, shall be appointed to prepare a Landscape Impact Statement for assessment and approval by the Heritage Council or its delegate, prior to work commencing on the site.

Setting

The Branch is of the opinion that the proposed hotel development is likely to dominate the adjacent Officials Stand. It is noted that none of the photomontages or architectural drawings included in the urban design document, prepared by Tonkin Zulaikha Greer, include photomontages showing the view of the Officials Stand, modern grand stands, the proposed hotel, outdoor bar and associated landscaping, from trackside. To assist in the assessment of the potential impacts of the proposed design scheme on the setting of Officials Stand, it is recommended that the Department request the applicant provide views (photomontages or fully articulated colour drawings) of the how the development would appear to spectators from trackside.

In terms of the impact of the proposal on the precinct as a whole, the location of the proposed hotel on the outer edges of the Spectator Precinct will minimise its impact on visual and spatial relationships of significant built items in the precinct. The Applicant should however, be asked to detail what other locations were considered for the development and why these locations were deemed unsuitable.

In regards to Centennial Park and the North Randwick Heritage Conservation Area, the Heritage Branch accepts the view that the separation of the proposed development site from Centennial Park and the North Randwick Heritage Conservation Area by the four lanes of Alison Road will mitigate to some degree the impact of the proposed development on the heritage values of these items. Branch also notes, in relation to the Heritage Conservation Area, that the Conservation Area is partly of significance for its consistent Federation streetscapes. The development immediately across the road from the subject site comprises relatively modern commercial development.

Views and Visas

The Heritage Branch notes that the proposed design scheme largely maintains the significant historic view (identified into the CMP) into the site from the north along Darley Road and views into the site from Alison Road. The proposed development scheme is likely to impact on views on from the infield to Gate 6 & 7 and the view through Gate 6 & 7 from Alison Road. Although as pointed out in the HIS, presently the view through Gate 6 & 7 is partially obscured by the Oak Marquee.

As the proposed hotel is located in the north-east corner of the Spectator Precinct it does not, in the view of the Heritage Branch, impact significant views and vistas to or from heritage items within the precinct or impact on view lines between key precinct items.

Outdoor Bar

The Branch is of the option that the simple form of the outdoor bar comprises a relatively un-intrusive new element to the Spectators Precinct. It is to comprise a single storey, light weight structure of contemporary design located at the eastern end of the Officials Stand. The primary view of the Officials Stand is to the racetrack. This view will not be significantly impacted upon by the election of the outdoor bar. It is suggested that the Department request a material and finishes schedule for this item.

Hotel Design

The Heritage Branch recommends that the Department seek further detail from the Applicant on how the set backs, form, character and materials of the proposed development relate sympathetically to the significant built components of the site, in particular the Officials Stand and former Entrance Turnstile. The additional information should detail for example, the extent of the set backs of the development from the Officials Stand and former Turnstile building, and what other design measures have been undertaken to minimise the impact of the development on adjacent heritage items and integrate the development in the precinct

and the surrounding urban area. As noted above, it is recommended that the Department requests photomontages or fully articulated coloured drawings of the development to assist in assessing whether the character, height and massing of the proposed development is sympathetic to the heritage values of the site. Comment on specific aspects of the design concept is provided below:

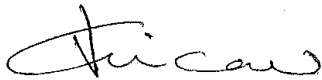
- The Heritage Branch supports in principle the design concept whereby the track facing elevation of the hotel (south facade) is designed to take on the guise of a grandstand, its terrace stepping down to the track. It is recommended that the Department seek further detail as to how this concept is to be expressed in the design of the hotel;
- The Branch notes that the impact of the proposed development on the setting of the former Turnstile Building is mitigated to some degree by the elevation of the eastern end of the proposed hotel two storeys above ground level;
- It is noted that the siting of the proposed hotel and the geometry of podium allows for the retention of views into the racecourse from Darley and Alison Roads.

Business Signage

In relation to this item, Heritage Branch recommends the Applicant be asked to address the questions noted under 'New Signage' included in the NSW Heritage Office's (now Branch) publication *Statements of Heritage Impact*.

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



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