



Heritage Council



of New South Wales

3 Marist Place
Parramatta NSW 2150

Locked Bag 5020
Parramatta NSW 2124
DX 8225 PARRAMATTA

Telephone: 61 2 9873 8500
Facsimile: 61 2 9873 8599

heritage@heritage.nsw.gov.au
www.heritage.nsw.gov.au

Contact: Tracy Appel
Phone: 02 9873 8559
Fax: 02 9873 8599
Email: Tracy.Appel@heritage.nsw.gov.au
File number: 10/11198
Your ref: SSD – 5002-2011

Mr Alan Bright
Acting Director
Metropolitan & Regional Projects South
GPO Box 39
SYDNEY NSW 2001

Attention: Caroline Owen

Dear Mr Bright

Re: SSD 5002-2011 – Request for Input into Director General's Requirements (DGRs) for Randwick Racecourse, Randwick

Thank you for your letter dated 26 March 2012 seeking formal agency input to the Director-General's requirements (DGRs) for the preparation of an Environmental Impact Statement (EIS) for the project. 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 has reviewed the proposed DGRs and the supporting documents for the project and it is noted that Heritage is identified as a key issue to be addressed by the EIS. The Heritage Branch recommends the following amendments to the text of the proposed DGRs:

DGR No. 2 – Policies, Guidelines and Planning Agreements

The applicant should be required to address the conservation policies and guidelines included in the final draft of the Royal Randwick Conservation Management Plan prepared by Godden Mackay Logan (dated December 2006), and any relevant guidelines and/or recommendations in non-Aboriginal and Aboriginal archaeological and landscape assessments of the site.

DGR No. 8 – Heritage

It is recommended that the wording of this DGR be amended as follows:

A Heritage Impact Statement shall be prepared identifying the potential impacts on any heritage items, areas or places of natural, Aboriginal, historic, landscape, industrial or archaeological significance on the site and in the surrounding area, in accordance with NSW Heritage Office publication 'Statement of Heritage Impact.'

The Heritage Impact Statement should address relevant policies and guidelines in the draft Royal Randwick Racecourse Conservation Management Plan prepared by Godden Mackay Logan (dated December 2006).

Consultation

The Heritage Council should be included in the list of identified organisations and government bodies to be consulted.

Generally, in relation to Heritage, it is advised that the EIS should address the following issues:

- The heritage significance of the site and any impacts the development may have upon this significance should be assessed. This assessment should include natural areas and places of Aboriginal, historic or archaeological significance. It should also include a consideration of wider heritage impacts in the area surrounding the site;

The applicant or the applicant's representative should consult lists maintained by the Office of Environment & Heritage, the National Trust of Australia (NSW), the Australian Government under the *Environment Protection and Biodiversity Conservation Act 1999* and the local council in order to identify any identified items of heritage significance in the area affected by the proposal. Please be aware, however, that these lists are constantly evolving and that items with potential heritage significance may not yet be listed;

- Non-Aboriginal heritage items within the area affected by the proposal should be identified. This should include any buildings, works, relics, landscaping, views, trees or places of non-Aboriginal heritage significance. A statement of significance and an assessment of the impact of the proposal on the heritage significance of identified items should be undertaken by a qualified practitioner/consultant with historic sites experience. Any policies/measures to conserve their heritage significance should be identified. This assessment should be undertaken in accordance with the guidelines in the NSW Heritage Manual and the Heritage Office publication 'Statements of Heritage Impact.' Please note that the Heritage Branch's website can provide lists of suitable consultants.
- The proposal should have regard to any impacts on places, items or relics of significance to Aboriginal people. Where it is likely that the project will impact on Aboriginal heritage, adequate community consultation should take place regarding the assessment of significance, likely impacts and management/mitigation measures. For guidelines regarding the assessment of Aboriginal sites, please contact the Office of Environment & Heritage;
- Where possible refer to archaeological zoning plans or archaeological management plans held by Local Councils.

The Heritage Branch would be happy to review any further documentation that may address any likely heritage impacts arising from the proposal. If you have any further enquiries regarding your request for input on the DGRs, please contact Tracy Appel using the details provided on this letter.

Yours sincerely



05/04/2012

Vincent Sicari

Manager

Conservation Team

Heritage Branch, Environment and Heritage, Policy and Programs Group

Office of Environment & Heritage

AS DELEGATE OF THE NSW HERITAGE COUNCIL