

Ms Minoshi Weerasinghe  
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Department of Planning, Industry & Environment  
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By email: [minoshi.weerasinghe@planning.nsw.gov.au](mailto:minoshi.weerasinghe@planning.nsw.gov.au)

Dear Ms Weerasinghe,

**RE: SSD 10285 — Leger Lawn Development (Winx Stand) – RTS**

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I refer to an email from the Department dated 9 April 2020 enclosing the Response to Submissions for the above State Significant Development proposal. The proposal involves development of a new two storey “Winx Stand” multipurpose facility on the Leger Lawn which is located next to the existing QE-II Grandstand, and within the Spectator Precinct of the Royal Randwick Racecourse. The Racecourse is not listed on the State Heritage Register.

It is noted that Heritage NSW provided comments on the EIS for the proposal as Delegate for the Heritage Council of NSW in December 2019.

The following documents were reviewed for this response:

- Royal Randwick Racecourse SSD-10285 Winx Stand, Response to Submissions, report by Urbis dated 9 April 2020 for the Australian Turf Club; and other key documents, in particular:
- Appendix D: Revised Historical Archaeology Assessment (Urbis Pty Ltd) 3 February 2020

Previously Heritage NSW concurred with the overall findings of the EIS and considered that the proposal should not be opposed on any heritage grounds as it is unlikely to have any detrimental heritage impacts on the Randwick Racecourse, and would continue the significant use of the place for racing and entertainment.

Heritage NSW had specific comments on the Historical Archaeology report mostly related to some errors in its recommended actions and processes. It is noted that the erroneous recommendations have been removed from the updated report of February 2020.

Because there is no historical archaeology of significance at the Ledger Lawn, it was recommended that an Unexpected Finds condition would be appropriate if the proposal is to be approved. Urbis has now provided the following updated conclusions and recommendations:

*Based on the above conclusions, we recommend the following:*

- 1. The proposed construction of the Winx Stand will not have impact on historical archaeological resources and the development can proceed with the Chance Find Procedure outlined below.*
- 2. In the event of uncovering any archaeological resources including relics, the following Chance Find Procedure must be implemented:*

- Stop work and demarcate affected area.
- Contact a suitably qualified archaeologist or heritage consultant to provide advice and assess the finds.
- Notify the Heritage Council of NSW under Section 146 of the NSW Heritage Act 1977 if the finds are assessed as relics under the NSW Heritage Act 1977.
- Provide an appropriate archaeological management plan to manage the identified relics.
- Resume work only when the proposed management plan has been applied and written clearance is provided.

The above recommendations are generally appropriate, and these matters should be Conditioned by DPIE if the proposal is approved. If conditioned, the Conditions should be expressed as 'a suitably qualified historical archaeologist who meets the Heritage Council Criteria for Excavation Directors (2019)' and archaeological management processes should be included in the Construction Heritage Management Plan for the site.

As raised in our prior letter, it is still recommended that DPIE should consider whether interpretation of the former history of the site and the succession of prior historic spectator stands should be incorporated within the new "Winx Stand" and if so, to impose Interpretation Conditions on any issued consent. Heritage NSW notes that the Conservation Management Plan (CMP) for the site prepared by Godden Mackay Logan in December 2006 required interpretation as a part of new development (Policy 22 of the CMP). The Urbis RTS report of February 2020 has not committed to Interpretation but has said it would be undertaken if it were to be Conditioned as part of the approval (RTS report page 26).

If you have any questions regarding the above advice please contact me on 02 9873 8546 or [siobhan.lavelle@environment.nsw.gov.au](mailto:siobhan.lavelle@environment.nsw.gov.au).

Yours sincerely



21/04/2020

**Dr Siobhan Lavelle OAM**  
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Heritage NSW  
Department of Premier and Cabinet  
**As Delegate of the Heritage Council of NSW**