

ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000

URBIS.COM.AU
Urbis Ltd
ABN 50 105 256 228

25 June 2024

Hayden Kegg
Project Director
Mostyn Copper Group
Suite 2 Level 8
60 Pitt Street
Sydney NSW 2000

Dear Hayden,

AUSTRALIAN TURF CLUB - ROYAL RANDWICK RACECOURSE NON-RACE DAY EVENTS – HISTORICAL ARCHAEOLOGICAL IMPACT ASSESSMENT

1. INTRODUCTION

This letter format Historical Archaeological Impact Assessment has been prepared to assess the impact to potential historical archaeological resources associated with the proposed use of land and buildings within the Spectator precinct of the Royal Randwick Racecourse for various non-race day activities including events, functions and festivals under State Significant Development Application (SSDA) SSD 63536466.

In preparing this letter, Urbis has considered the results of previous assessments at the Royal Randwick Racecourse, located at Alison Road, Randwick, on Gadigal land (the subject area). Previous assessments considered have included the *Randwick Racecourse Conservation Management Plan* (CMP) prepared by Godden Mackay Logan (GML, 2006), the *Historical Archaeological Assessment, Winx Stand – Leger Lawn, Royal Randwick Racecourse*, prepared by Urbis (Urbis, 2019) and the *Australian Turk Club – Royal Randwick Racecourse Night Racing – Historical Archaeological Impact Assessment Addendum Letter*, prepared by Urbis (Urbis, 2021).

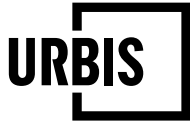
2. SITE LOCATION AND DESCRIPTION

The subject area is located at the Royal Randwick Racecourse, Alison Road, Randwick, Gadigal land, New South Wales, comprising Lot 2009 DP 116904, within the bounds of the Randwick Local Government Area (LGA).

The current proposed non-race day events would be held in the Spectator Precinct within the broader Royal Randwick Racecourse site.

The subject area can be summarised as the following:

- **The Spectator Precinct:** accommodates Royal Randwick's spectator, entertainment and convention facilities, and comprises a concentration of buildings/structures, a number of which are significant in heritage and landscape terms. This area accommodates the Queen Elizabeth II Stand



and new Winx Stand (refer SSD-10285). Access and egress infrastructure such as the exclusive bus way and taxi terminal have been designed and constructed to facilitate a crowd of up to 55,000 people.

3. PROPOSED WORKS

This application seeks approval for the use of land and buildings within the Spectator precinct of the Royal Randwick Racecourse for various non-race day activities including events, functions and festivals. The proposed application seeks consent for the accommodation of non-race day event activities on the site throughout the year, which will provide greater flexibility than previous approvals.

The proposed application seeks consent for the accommodation of non-race day event activities on the site throughout the year, which will provide greater flexibility than previous approvals. The application will also involve the erection of temporary structures including stages, marquees, screens, and ancillary structures such as amenities, lighting, etc typically found at events within the designated zones in the Spectator, and Infield precincts. The temporary structures will be erected in the days preceding the events and dismantled and removed from the site within 10 days following the event. Existing services and utilities will be utilised for the events.

These temporary structures are **not permanent** and will not result in significant ground penetration. As such the proposal will not result in additional impacts to the ground surface

Non-race day events will include 10 per year, with a patron capacity of between 5,000 - 15,000 patrons.

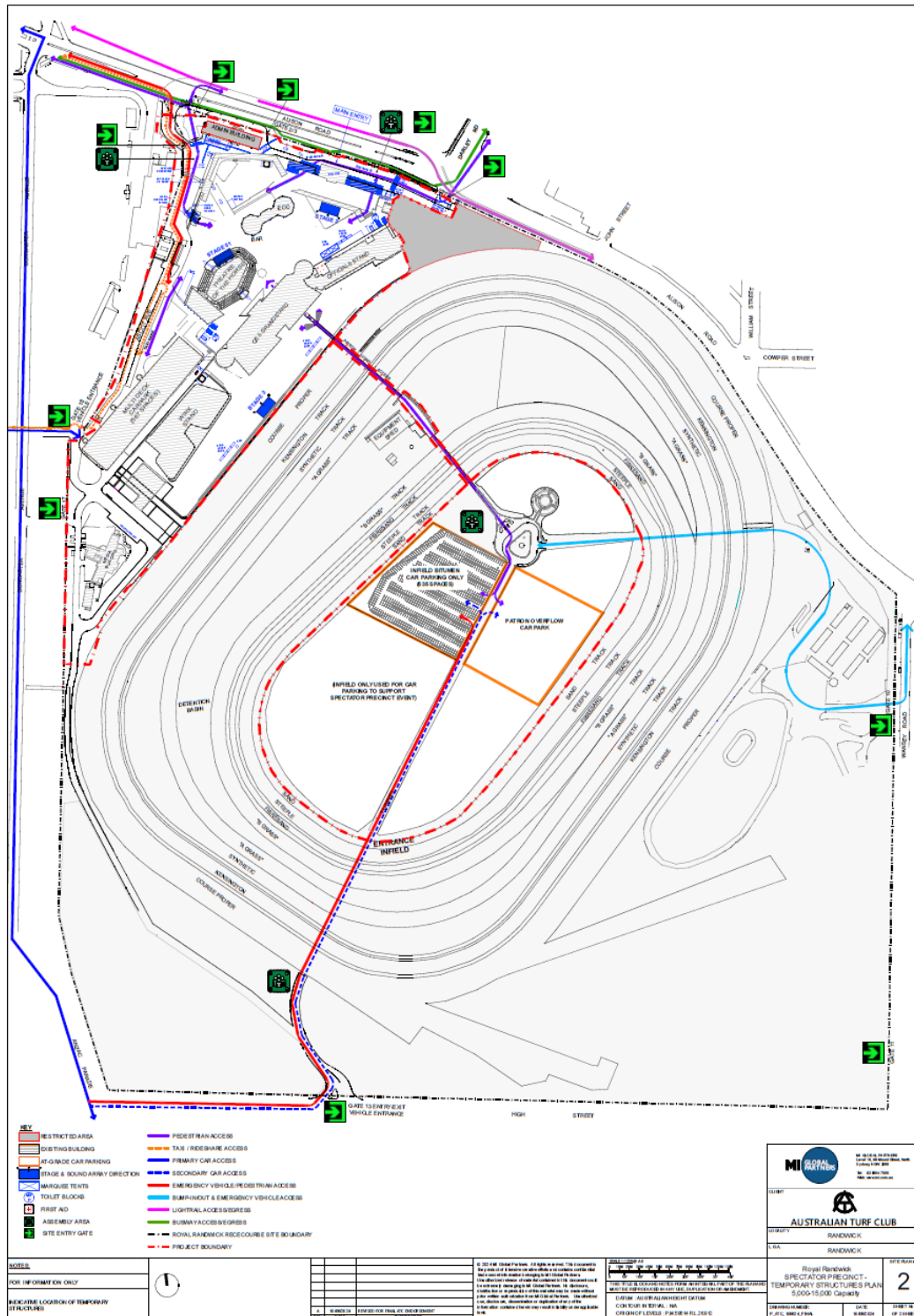


Figure 1 – Spectator Precinct – Temporary Structures Plan
Source: MI Global Partners, Drawing No. P_ATC_120624_FINAL, June 2024

4. HISTORICAL ARCHAEOLOGICAL IMPACT ASSESSMENT

The CMP identified various areas of historical archaeological sensitivity, with potential for relics of moderate and low significance. In light of legislative changes to The *Heritage Act 1977* As amended (2009), 'moderate' and 'low' are no longer considered appropriate gradings of significance for archaeological relics, with only two levels of significance identified in the legislation – being State and Local significance. Archaeological resources are only considered relics when they satisfy the criteria for significance on a local or State level. The following defines these gradings:

'State heritage significance', in relation to a place, building, work, relic, moveable object or precinct, means significance to the State Heritage Register. in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item. (Section 4A)

'Local heritage significance', in relation to a place, building, work, relic, moveable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item. (Section 4A)

In view of this, the gradings of significance as identified by GML in the 2006 CMP can instead be considered as nil (low) and Local (moderate), depending on the integrity of the resource and the ability to provide information that can't be derived from other sources. Due to the high level of disturbance at the subject site, and given that a large amount of historical information is readily available for the history of the site, it is anticipated that any potential relics would be Locally significant, with limited research potential or ability to provide information that is not already known.

Figure 4 below represents areas of potential archaeological significance as identified by GML in the CMP, with the Spectator Precinct indicated as Area 2 and 4 (ARF Laboratory Area). These are the areas proposed for activity under the application. The discussion of archaeological potential and impact within these areas is included below.

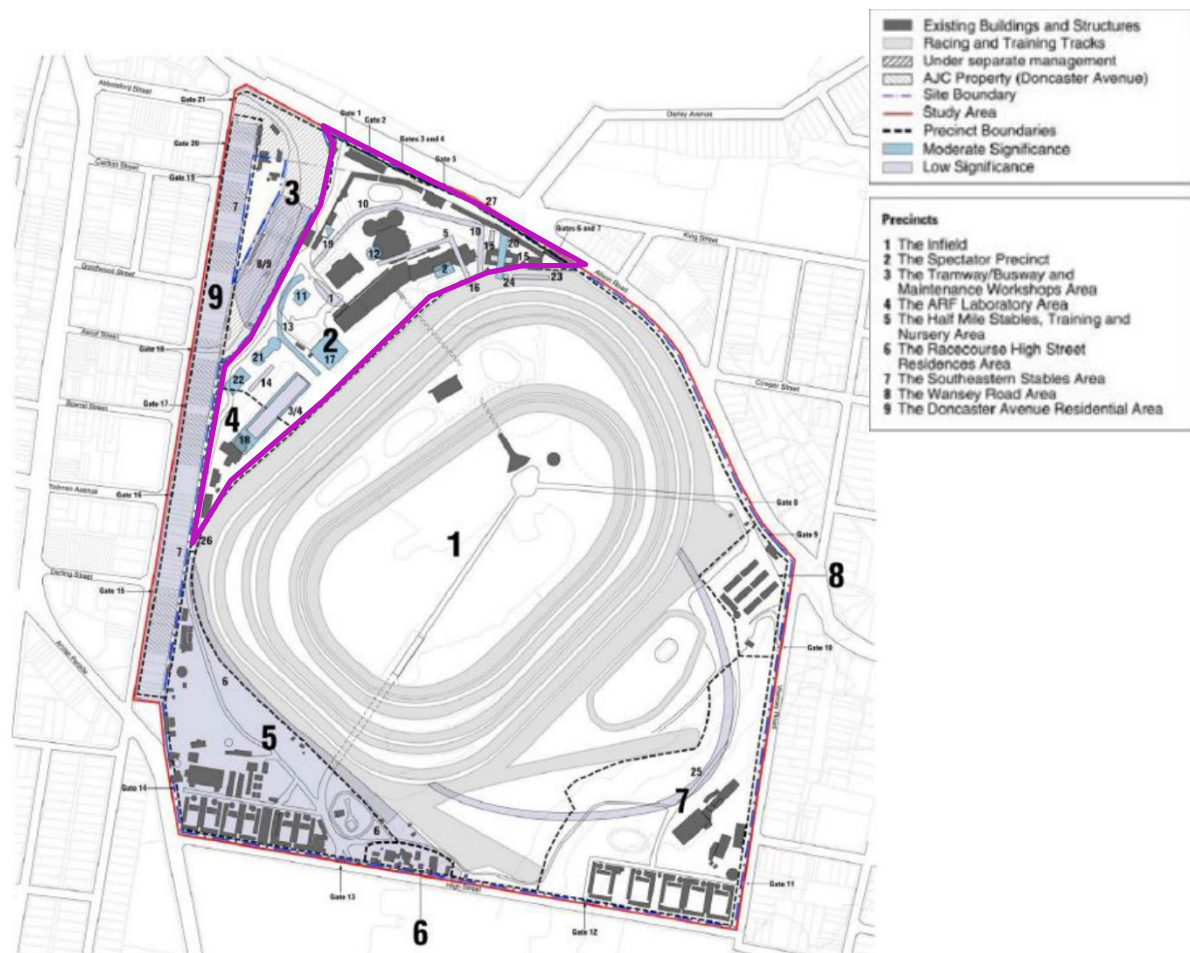


Figure 5.4 Potential Historical Archaeological Significance.

Royal Roadhok Racecourse—Conservation Management Plan—Volume 1: Main Report—Final Draft, December 2016

Figure 2 – Areas of identified archaeological significance from GML 2006 CMP, Spectator Precinct indicated in purple.

Source: GML base plan, GML, 2006, figure 5.4, pg. 147.

Area 2 and Area 4 – The Spectator Precinct

The Spectator Precinct combines the Spectator Precinct and ARF Laboratory Area, currently occupied

Given the changing and uncertain nature of COVID-19, Urbis has put in place several measures to support business continuity. However, the specific nature of COVID-19 may require our people to work remotely for an extended period of time and as a result potentially impact project timeframes. If there is any potential impact on our agreed timeframes or methods of work delivery, we will contact you to make alternative arrangements that minimise these impacts.

been utilised for the same purpose with a series of stands constructed and demolished across the history of the site. The GML 2006 archaeological sensitivity mapping identifies a number of areas where potential relics of Local significance may occur, and geophysical scanning for previous developments at the subject area (2019, MALA) identified a series of potential footings within the Spectator Precinct, associated with the former Queen's Stands and possibly scratching Tower. The Spectator Precinct and ARF Laboratory Area are therefore determined to have moderate-high potential for relics, primarily consisting of structural remains, of local significance. While generally potential archaeological deposits identified across the subject site consist primarily of structural remains, there is an additional possibility that artefactual deposits may occur, indicative of incidental events rather than intentional deposition (GML 2006b:ii). The potential for low-density isolated artefacts is unlikely due to extensive historical disturbances.

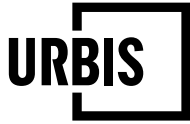
However, although the current SSD proposes activities within the Spectator Precinct, these activities are anticipated to predominantly utilise existing structures and services, with no anticipated impacts to the ground surface associated with the proposal. While some temporary structures may be erected, these are not anticipated to disturb the ground surface although may include the use of small tent pegs to stabilise temporary marquees and similar items. This is consistent with existing activities at the subject area and does not constitute a potential impact to archaeological relics.

It is therefore determined that the proposed works are unlikely to result in any impacts to the ground surface or identified potential locally significant archaeological relics.



Figure 3 – View of the racecourse, before commencement of construction works in the mid-1870s. A series of stands occupy the spectator precinct, with the St Leger Stand at far left (demolished 1882); the 1860 Hilly Grandstand at centre (demolished 1875); and the Derby Stand at right (demolished 1880).

Source: State Library of New South Wales



5. CONCLUSIONS AND RECOMMENDATIONS

It has been determined that it is unlikely that the proposed use of the subject area for non-race day activities will not result in impacts to archaeological relics. While the Spectator Precinct has moderate-high archaeological potential for archaeological relics of local significance, the proposed works do **not** include any ground disturbance works. There are therefore **no impacts** anticipated resulting from the current proposal. The proposed works under SSD-63536466 involve the casual use of the subject area for non-race day activities, including opportunities for music festivals and other temporary events. No permanent structures or services are proposed associated with this use, with the erection of temporary, non-fixed structures above ground surface level on an ad-hoc basis.

Based on the above conclusions, Urbis recommends the following:

1. This assessment should be kept as evidence of due diligence at the subject area.
2. Although no ground works are proposed during this scope of works, if ground disturbance is proposed in future projects at the site, a separate assessment will be required.

Urbis confirm that works within the subject site are supported in conjunction with the above recommendations.

Kind regards,

A handwritten signature in black ink, appearing to read "Balazs Hansel".

Balazs Hansel
Director
+61 2 8233 7668
bhansel@urbis.com.au