



IRF 25/2124

# Alteration of Gateway determination assessment report – PP-2023-2235 / GA-2025-107

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Revised planning proposal for the Randwick Junction Town Centre

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# Acknowledgment of Country

The Department of Planning, Housing and Infrastructure acknowledges the Traditional Owners and Custodians of the land on which we live and work and pays respect to Elders past, present and future.

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**Table 1 Reports and plans supporting the revised proposal**

| Relevant reports and plans                                                                                                        |
|-----------------------------------------------------------------------------------------------------------------------------------|
| Randwick Junction Town Centre Strategy – Appendix 1 (August 2020), Randwick City Council                                          |
| Randwick Junction Heritage Conservation Area Review (July 2015), City Plan Heritage                                               |
| Heritage Assessment - Randwick Junction Town Centre Planning Strategy (June 2023), City Plan Heritage                             |
| Statement of Heritage Impact – Addendum to Heritage Assessment for Randwick Junction Town Centre Planning Strategy (10 July 2025) |
| Draft Randwick Junction Town Centre - Affordable Housing Plan (2 June 2025), Randwick City Council                                |
| Randwick Planning Proposals – Flood Constraints Assessment (5 June 2025), BMT                                                     |
| Contamination Desktop Study for proposed Randwick Junction Town Centre (18 December 2024), JK Environments                        |
| Randwick Junction Planning Proposal – Boundary Extension Sites (May 2025), Randwick City Council                                  |
| Contributory buildings with no change proposed, Randwick City Council                                                             |
| Community Consultation Report – Randwick Junction Planning Strategy (9 December 2020)                                             |
| Draft LEP Maps                                                                                                                    |

# 1 Planning proposal

## 1.1 Overview of revised proposal

### 1.1.1 Revised planning proposal details

**Table 2 Revised planning proposal details**

|                                                 |                                                      |
|-------------------------------------------------|------------------------------------------------------|
| <b>LGA</b>                                      | Randwick local government area (LGA)                 |
| <b>PPA</b>                                      | Randwick City Council                                |
| <b>NAME</b>                                     | Randwick Junction Town Centre                        |
| <b>NUMBER</b>                                   | PP-2023-2235 / GA-2025-107                           |
| <b>LEP TO BE AMENDED</b>                        | <i>Randwick Local Environmental Plan 2012</i>        |
| <b>ADDRESS</b>                                  | Multiple properties in Randwick Junction Town Centre |
| <b>DATE GATEWAY ALTERATION REQUEST RECEIVED</b> | 11/7/2025                                            |
| <b>FILE NO.</b>                                 | IRF25/2124                                           |

### 1.1.2 Site description

Randwick Junction town centre is a well-located centre, serviced by frequent bus and light rail services. The centre comprises a mix of residential, retail, commercial and community uses, including shop top housing, educational establishments, Randwick Police Station, Royal Randwick and Randwick Plaza shopping centres, as well as health consulting rooms and health related businesses.

The town centre is part of the Randwick Junction Heritage Conservation Area (HCA) and also contains 32 heritage items including two state heritage items (Sandgate Cottage at 128 Belmore Road (I301) and Easts House at 124 Alison Road, the former Post Office (I274)).

The revised planning proposal applies to land in the Randwick Junction town centre as shown in **Figure 1**. The area subject to the proposal has been reduced post-Gateway.

**Section 4** of this report contains the Department's assessment of the post-Gateway changes to the area the proposal applies to. Further details regarding the site and surrounding land can be found in **Section 1.4** of the Departments original Gateway assessment report.



**Figure 1 Land subject to revised planning proposal (Source: Planning Proposal, July 2025, p.7)**

## 1.2 Objectives and intended outcomes

The objective of the revised planning proposal is to amend the *Randwick Local Environmental Plan 2012* (Randwick LEP 2012), to deliver sustainable growth in housing including affordable housing, employment and public benefits within the Randwick Junction Town Centre (RJTC).

Whilst there have been changes to the wording of the intended outcomes in the revised proposal, the intent remains generally consistent with what was considered in the Gateway assessment.

The revised planning proposal estimates it will provide capacity for up to 800 homes and 750 jobs over the next 20 years.

The objectives of the revised proposal are adequate.

## 1.3 Explanation of provisions

The revised planning proposal contains an explanation of provisions that outlines how the objectives of the revised planning proposal will be achieved.

In summary, the revised planning proposal seeks to amend the Randwick LEP 2012 to:

- rezone the following land from R3 Medium Density Residential to E2 Commercial Centre:
  - 119, 121, 123, 125 and 127-129 Alison Road, Randwick
  - 7 & 9 Silver Street, Randwick
  - 144 Avoca Street, Randwick
  - 60 and 62 High Street, Randwick.
- rezone land known as 'Waratah Plaza' from E2 Commercial Centre to RE1 Public Recreation
- increase the maximum floor space ratio (FSR) and height of buildings (HOB) on certain sites across the centre
- introduce an additional local provision to permit the collection of affordable housing contributions on certain sites
- apply an active street frontages provision to sites fronting Belmore Street, High Street, Alison Road and Avoca Street
- apply a minimum non-residential uses FSR of 1.15:1 to certain key sites
- rectify a mapping anomaly by removing the FSR and HOB standards from part of the road reserve on Short Street, Randwick.

Key sites in the centre have additional HOB and FSR to what was proposed at Gateway to facilitate redevelopment of up to:

- 45m (13 storeys) on the Royal Randwick Shopping Centre site at 73-109 and 111-115 Belmore Road
- 40.5m to 42m (11-12 storeys) on the Randwick Plaza Shopping Centre and Gateway site at the corner of Belmore Road and High Street
- 39m (12 storeys) on land at 16, 20 & 22-24 Belmore Road (former CBA site)
- 36m (11 storeys) on land within The Randwick Club site on Alison Road.

**Table 3** outlines the current LEP controls and the changes proposed by the revised planning proposal.

The Department's detailed assessment of the revised planning proposal and changes made since the original Gateway assessment can be found in **Section 4** of this report.

**Table 3 Current and proposed controls under revised proposal**

| Control                        | Current LEP                                           | Proposed (Revised planning proposal)                                 |
|--------------------------------|-------------------------------------------------------|----------------------------------------------------------------------|
| Zone                           | R3 Medium density residential<br>E2 Commercial Centre | E2 Commercial Centre<br>RE1 Public recreation (Waratah Avenue Plaza) |
| Maximum height of the building | 12m                                                   | 15m to 45m**                                                         |
| Floor space ratio              | 0.9:1                                                 | 2.2:1 to 4.5:1                                                       |

| Control                          | Current LEP                                                                                               | Proposed (Revised planning proposal)                                                          |
|----------------------------------|-----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
|                                  | 2:1                                                                                                       |                                                                                               |
| Non-residential FSR              | Nil.                                                                                                      | 1.15:1 on certain key sites**                                                                 |
| Minimum lot size                 | Nil.                                                                                                      | No change.                                                                                    |
| Heritage                         | Randwick Junction Heritage Conservation Area (HCA)<br>32 heritage items including 2 state heritage items. | No change to LEP.                                                                             |
| Affordable housing contribution  | Nil.                                                                                                      | 3 to 9% on certain sites                                                                      |
| Active street frontages          | Nil.                                                                                                      | Sites with frontages to Belmore Street, High Street, Alison Road and Avoca Street in the RJTC |
| Design Excellence<br>Clause 6.11 | Clause 6.11 applies to certain development types.                                                         | No change.                                                                                    |

**\*\*Post-Gateway changes have also been made to the proposed local heritage conservation incentive provision. See [Section 4](#) of this report.**

**\*\*Post Gateway changes to the proposed FSR have been justified in the report to Council. For clarity during consultation, a **Gateway condition** is recommended that the planning proposal be updated prior to consultation, to note the evidence base which has supported the post-Gateway changes to the proposed non-residential FSR rates.**

Additionally, the revised planning proposal seeks various housekeeping amendments to the existing Randwick LEP 2012 Height of Building and Floor Space Ratio maps, to correct mapping anomalies and boundary discrepancies relating to certain land at Short Street, Randwick.

### 1.3.1 Waratah Avenue Plaza

Since the Gateway determination was issued, construction of the Waratah Plaza has been completed and it is now open. The plaza was jointly funded by the NSW Government and Council.

The revised planning proposal seeks to rezone Waratah Avenue Plaza from E2 Commercial Centre to RE1 Public Recreation. There has been no change to this element of the planning proposal since Gateway.

### 1.3.2 Randwick Development Control Plan (DCP) 2013

Council has prepared a draft site-specific DCP for the town centre to accompany the revised planning proposal to help guide development. It includes detailed built form controls and changes to the sites listed as 'contributory buildings' in the Randwick Junction HCA.

It is expected that the draft DCP will be exhibited concurrently with the revised planning proposal.

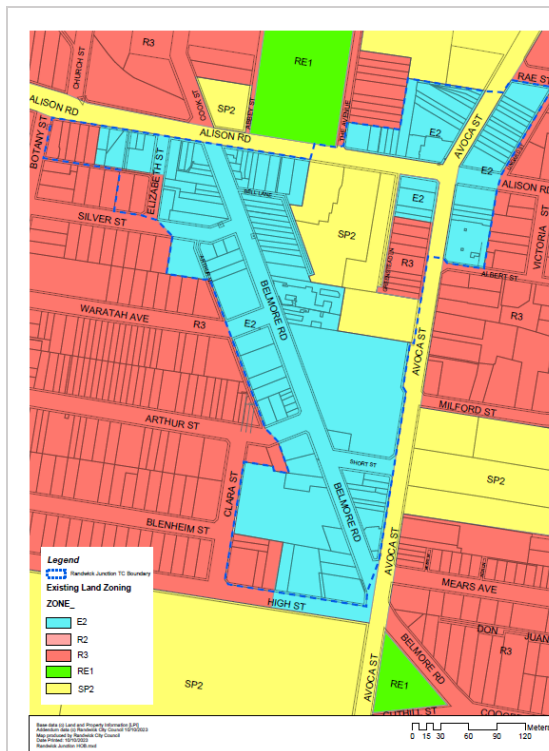
DCPs are a matter for Council and are separate to the planning proposal process which amends the LEP. The Department does not have a role in the assessment of local DCPs.

## 1.4 Mapping

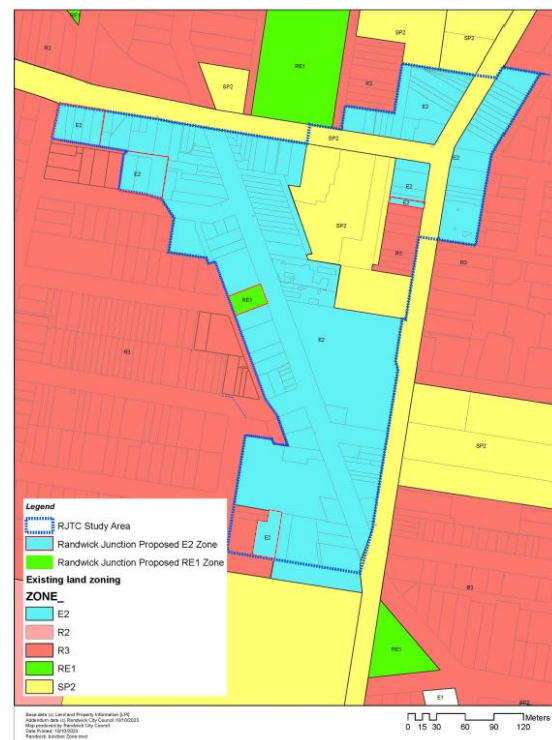
The revised planning proposal seeks to amend the following LEP maps:

- Land Zoning Map
- Height of Buildings Map
- Floor Space Ratio Map
- Non-residential Floor Space Ratio Map
- Active Street Frontages Map
- Special Provisions Area Map.

Extracts of the existing and proposed maps are provided in **Figures 2 to 10** below.



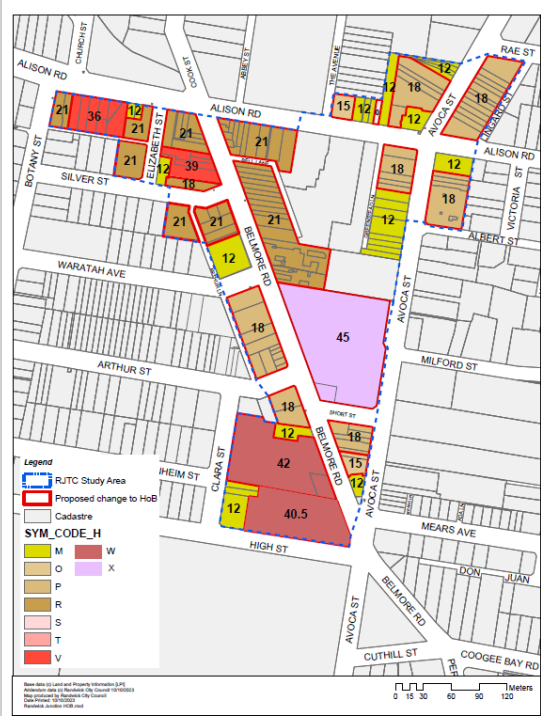
**Figure 2 Existing Land Zoning Map (Source: Revised planning proposal, 28 May 2025)**



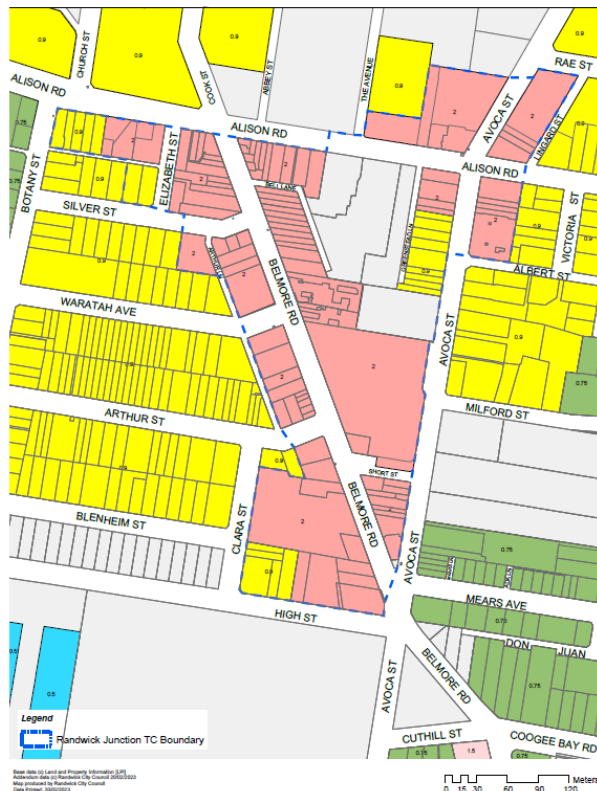
**Figure 3 Proposed Land Zoning Map (Source: Revised planning proposal, 22 May 2025)**



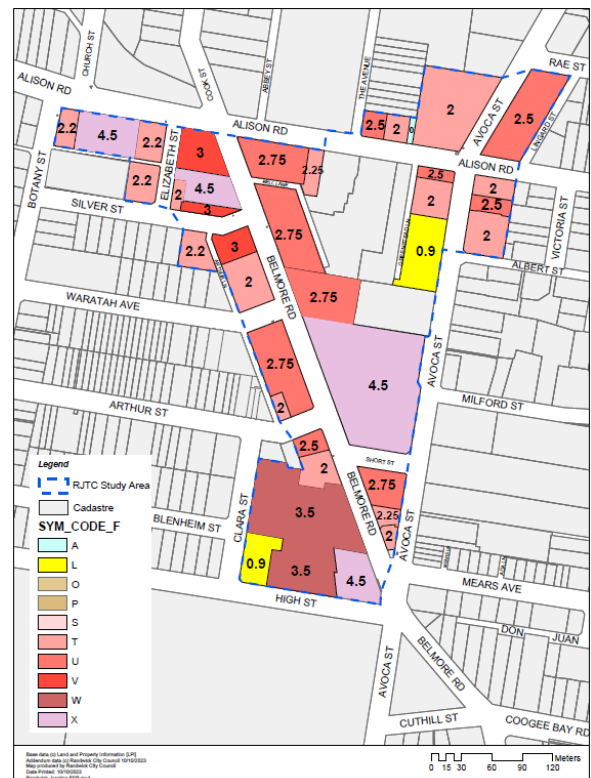
**Figure 4 Existing Height of Building Map (Source: Revised planning proposal, 28 May 2025)**



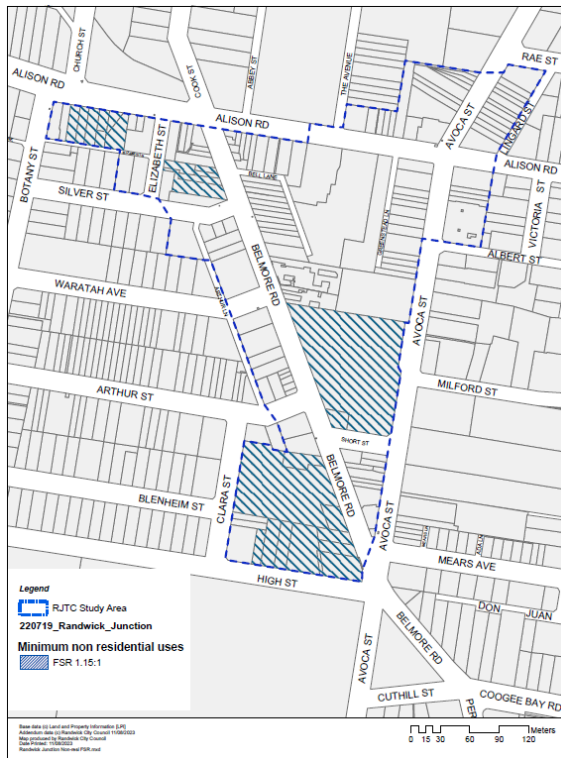
**Figure 5 Proposed Height of Building Map (Source: Revised planning proposal, 31 May 2025)**



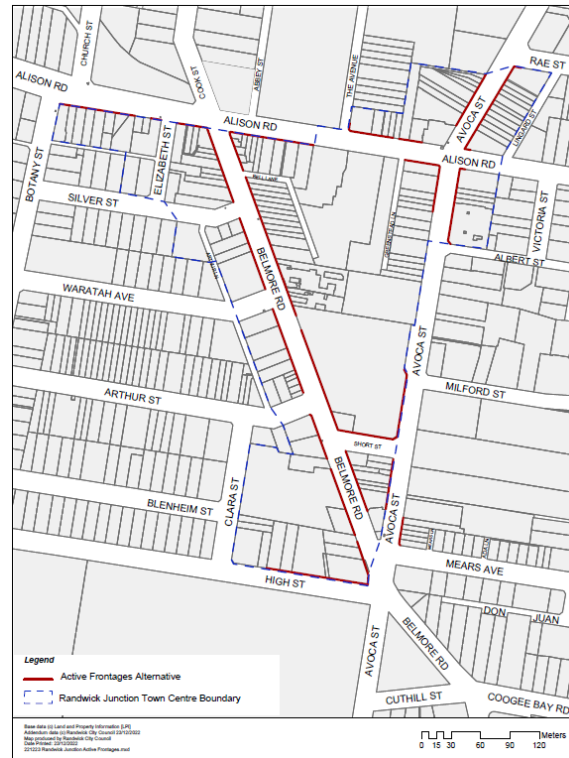
**Figure 6 Existing Floor Space Ratio Map (Source: Revised planning proposal, 28 May 2025)**



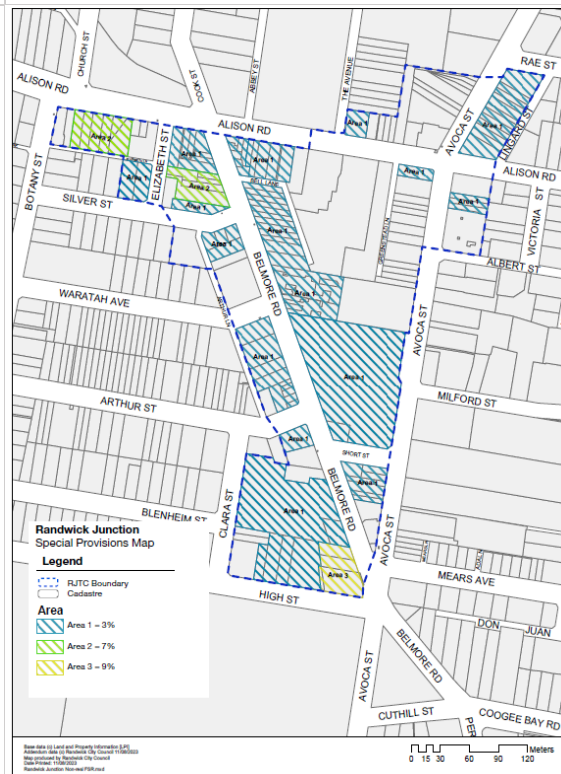
**Figure 7 Proposed Floor Space Ratio Map (Source: Revised planning proposal, 31 May 2025)**



**Figure 8 Proposed Non-Residential Floor Space Ratio Map (Source: Revised planning proposal, 29 May 2025)**



**Figure 9 Proposed Active Street Frontages Map (Source: Revised planning proposal, 31 May 2025)**



**Figure 10 Proposed Special Provisions Area Map (Source: Revised planning proposal, 6 June 2025)**

The Department has identified several anomalies in the draft maps in the revised planning proposal, including:

- The existing FSR and HOB controls for Lot 1 in DP822327 have been removed from the proposed HOB and FSR maps in the revised planning proposal. This anomaly should be corrected prior to consultation.
- Section 4.2.1 of the revised planning proposal states that no changes are proposed to the zoning or development standards that apply to sites containing state heritage inventory and highly valued heritage/contributory buildings. However, land at 128 Belmore Road, Randwick (Lot 2 in DP 623630) comprising a state heritage item (SHR#00067: 'Sangate') is identified on the proposed Non-Residential Use FSR Map showing a proposed FSR control of 1.15:1 on the land. Council should clarify the intent of the revised proposal with respect to proposed development controls for land at 128 Belmore Road, Randwick, prior consultation.

For an abundance of clarity during consultation, in addition to the correcting the anomalies listed above, Council should undertake a detailed review and update the maps in the revised planning proposal to ensure they accurately reflect the existing and proposed controls and the intended outcome of the revised planning proposal. A **Gateway condition** to this effect is recommended.

Subject to amendments to comply with the recommended Gateway conditions, the revised planning proposal maps are considered suitable for community consultation.

## 2 Background

This section outlines key events since Gateway and recent changes to the NSW planning framework. A summary of key background information and a timeline is contained in the Department's Gateway assessment report.

Council has revised the planning proposal and there have been changes in the broader NSW planning framework, including the release of Stage 2 of the NSW Government's Low and Mid-Rise Housing Reforms and the commencement of the Housing Delivery Authority.

### 2.1 Revised planning proposal (Post Gateway)

Since the Gateway determination was issued on 16 February 2025, Council has revised the planning proposal and undertaken additional work to address the Gateway conditions, including the preparation of technical studies.

On 17 June 2025 Council resolved to support the revised planning proposal. Subsequently, on 11 July 2025 the revised planning proposal was lodged for an Alteration of Gateway determination.

After undertaking a preliminary review, the Department requested additional information to clarify the intended effects and justification for the post-Gateway changes. The Department met with Council officers in August and September 2025 to discuss the requested additional information.

On 15 September 2025, the Department confirmed it had adequate information to undertake its assessment of the revised planning proposal.

The Department's assessment of the revised planning proposal is in **Section 4** of this report.

## 2.2 Low and Mid Rise (LMR) Housing Policy

On 28 February 2025, Stage 2 of the NSW Government's Low and Mid-Rise Housing reforms came into effect. These policy changes form part of *State Environmental Planning Policy (Housing) 2021* and seek to encourage more low and mid-rise housing to be built within 800 metres walking distance from nominated town centres and train/light rail stations.

Randwick town centre and light rail station are identified as a low and mid-rise housing area.

## 2.3 NSW Housing Delivery Authority

To accelerate the delivery of homes and help meet housing target under the National Housing Accord, the NSW Government established the Housing Delivery Authority (HDA). The HDA leads a new streamlined state significant development (SSD) pathway and SSD with a concurrent rezoning process.

The HDA's role is to evaluate proposals submitted through an expression of interest process and recommend to the Minister whether they should be declared as SSD. Following the Ministerial declaration as SSD, all HDA proposals will undergo community consultation and a rigorous merit assessment prior to determination. Applicants still have the option to go through a local or regionally significant development pathway.

The Department notes that there are sites within the Randwick Junction town centre that have had proposals declared SSD under the HDA pathway. The HDA pathway is a separate process to this revised planning proposal.

To provide abundant clarity during public exhibition, it is recommended that Council explain in its exhibition content that the HDA pathway is separate to the process for this planning proposal.

# 3 Gateway determination and alteration request

## 3.1 Gateway determination

A Gateway determination was issued on 16 February 2025 by the Acting Executive Director, Local Planning and Council Support, as delegate of the Minister for Planning and Public Spaces, allowing the proposal to proceed subject to conditions.

In summary, the Gateway determination requires updates to the proposal and supporting documents prior to consultation, and for a revised proposal to be forward to the Minister for consideration prior to exhibition.

The Gateway authorised Council to exercise the function of Local Plan Making Authority and requires completion of the LEP on or before 14 November 2025.

## 3.2 Alteration of Gateway determination request

On 11 July 2025, Council submitted the revised planning proposal and formal request for Alteration of the Gateway determination for PP-2023-2235.

The revised planning proposal was updated to address the Gateway conditions and respond to the new and updated technical studies. It also includes several administrative changes.

**Table 4** provides an assessment of the revised proposal against conditions of the original Gateway determination dated 16 February 2025.

**Table 4 Consistency of the revised proposal with the Gateway requirements**

| Gateway condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>1.a) Provide a plain English explanation of the rationale for the proposed heights and FSRs, including:</p> <ul style="list-style-type: none"> <li>i. the alignment between the proposed heights and FSRs</li> <li>ii. how it achieves the intended outcomes and enables flexibility for lot amalgamation and design excellence</li> <li>iii. how the transition to fine grain heights and FSRs is the simplest way to achieve the desired result</li> <li>iv. reasoning for certain contributory buildings not being identified for uplift</li> <li>v. that the proposal does not unintentionally limit future development potential by being overly prescriptive.</li> </ul> | <p><b>Condition met</b></p> <p>Section 4, Part 2 ‘Explanation of Provisions’ of the revised planning proposal includes updates which seek to address the Gateway requirements of Condition 1(a).</p> <p>Notwithstanding the above, the Department considers the requirements of Condition 1(a) to be no longer relevant given the substantial changes that has been made to the proposal post-Gateway. No further action to address this condition is required.</p> |
| <p>1.b) Review proposed height and FSR controls for the following areas to identify additional capacity, whilst being sympathetic to heritage items, on sites:</p> <ul style="list-style-type: none"> <li>i. in the block closest to the intersection of Alison Road and Belmore Road</li> <li>ii. along Belmore Road where lot depths would allow sufficient setbacks to mitigate any visual impact from the street.</li> </ul>                                                                                                                                                                                                                                                  | <p><b>Condition met</b></p> <p>The revised planning proposal includes amendments to the proposed height and FSR controls for certain sites across the centre to create additional capacity and have been informed by additional modelling, built form analysis and testing.</p> <p>See <b>Section 4</b> of this report for the Department’s assessment.</p>                                                                                                         |
| <p>1.c) Amend the planning proposal and draft Affordable Housing Contribution Scheme to be consistent with the Department’s <i>Guideline for Developing an Affordable Housing Contribution Scheme</i>. This must be supported by adequate information demonstrating that the proposed rates are viable at the proposed FSRs.</p>                                                                                                                                                                                                                                                                                                                                                  | <p><b>Condition met</b></p> <p>The revised planning proposal includes updates to the proposed affordable housing levy rates. It is supported by the updated Draft Randwick Junction Town Centre Affordable Housing Plan (2 June 2025), and updated feasibility analysis (2025).</p> <p>See <b>Section 4</b> of this report for the Department’s assessment.</p>                                                                                                     |
| <p>1.d) Remove the proposed requirement for Active Street Frontages from secondary roads and proposed new through-site links.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p><b>Condition met</b></p> <p>All references to the proposed Active Street Frontages requirements along secondary roads and proposed new through site links has been removed from the revised planning proposal, including the draft maps.</p>                                                                                                                                                                                                                     |

| Gateway condition                                                                                                                                                                                                                           | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.e) Remove references to the proposed new 'Affordable Housing Area' LEP map and update the Special Provisions Area map to reflect changes to the draft Affordable Housing Contribution Scheme required to meet Condition 1(c).             | <p><b>Condition met</b></p> <p>All references to the proposed Affordable Housing Area LEP map have been removed and the revised planning proposal is supported by an updated Special Provisions Area Map, which identifies the sites the proposed AHCS will apply to. This is consistent with the approach undertaken by Council to date for its exiting AHCS provisions in the LEP.</p> <p>See map in <b>Figure 10</b> and the Department's assessment in <b>Section 4</b> of this report.</p> |
| 1.f) Address the Randwick Local Housing Strategy                                                                                                                                                                                            | <p><b>Condition met</b></p> <p>The revised planning proposal includes an explanation of consistency with the local housing strategy.</p> <p>The Department's assessment is in <b>Section 4</b> of this report.</p>                                                                                                                                                                                                                                                                              |
| 1.g) Remove the proposed new design excellence clause.                                                                                                                                                                                      | <p><b>Condition met</b></p> <p>All references have been removed.</p> <p>The existing design excellence provisions in the LEP will continue to apply to land within the town centre.</p>                                                                                                                                                                                                                                                                                                         |
| 1.h) Update heritage mapping to reflect changes made as part of the Comprehensive LEP which came into effect on 1 September 2023.                                                                                                           | <p><b>Condition met</b></p> <p>The revised planning proposal includes an updated heritage map.</p>                                                                                                                                                                                                                                                                                                                                                                                              |
| 1.i) Address Ministerial Direction 4.4 Remediation of Contaminated Land                                                                                                                                                                     | <p><b>Condition met</b></p> <p>Section B of the revised planning proposal includes an explanation of consistency with s9.1 Ministerial Direction 4.4 Remediation of Contaminated Land.</p> <p>See the Department's assessment in <b>Section 4</b> of this report.</p>                                                                                                                                                                                                                           |
| 1.j) Address consistency with Ministerial Direction 4.1 Flooding, with consideration to the NSW Flood Planning Framework, the findings and recommendations of the 2022 NSW Flood Enquiry, and evacuation and access for emergency services. | <p><b>Condition met</b></p> <p>The revised planning proposal address' the consistency of the proposal with Ministerial Direction 4.1 Flooding and is supported by a Flood Constraints Assessment prepared by BMT (2025).</p> <p>See the Department's assessment in <b>Section 4</b> of this report.</p>                                                                                                                                                                                         |
| 2. Prior to exhibition, the planning proposal is to be amended in accordance with Condition 1 and forwarded to the Minister under s 3.34(6) of the Act.                                                                                     | <p><b>Condition met</b></p> <p>This request for an Alteration of Gateway determination meets this requirement.</p>                                                                                                                                                                                                                                                                                                                                                                              |

| Gateway condition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Department comment                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>3. Consultation is required with the following public authorities and government agencies under section 3.34(2)(d) of the Act and/or to comply with the requirements of applicable directions of the Minister under section 9 of the Act:</p> <ul style="list-style-type: none"> <li>• Transport for NSW</li> <li>• Department of Climate Change, Energy, the Environment and Water – Heritage</li> <li>• NSW</li> <li>• NSW Health – South Eastern Sydney Local Health District</li> <li>• University of NSW</li> <li>• Relevant utility providers, including Sydney Water and AusGrid.</li> </ul> <p>Each public authority is to be provided with a copy of the planning proposal and any relevant supporting material via the NSW Planning Portal and given at least 30 working days to comment on the proposal.</p> | <p><b>Condition not yet satisfied</b></p> <p>This condition requires consultation on the proposal with identified public authorities and agencies during exhibition.</p> <p>It is expected that consultation will be undertaken by Council after the alteration of Gateway determination is issued and all updates required prior to exhibition are made.</p> |
| <p>4. The planning proposal should be made available for community consultation for a minimum of 30 working days.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p><b>Condition not yet satisfied</b></p> <p>This condition requires public consultation on the proposal post-Gateway.</p> <p>It is expected that consultation will be undertaken after the Alteration of Gateway determination is issued.</p> <p>See discussion of consultation requirements in <b>Section 5</b> of this report.</p>                         |

## Other post-Gateway changes

Along with the changes made to address the Gateway conditions, Council has made several additional post-Gateway amendments to the planning proposal, including:

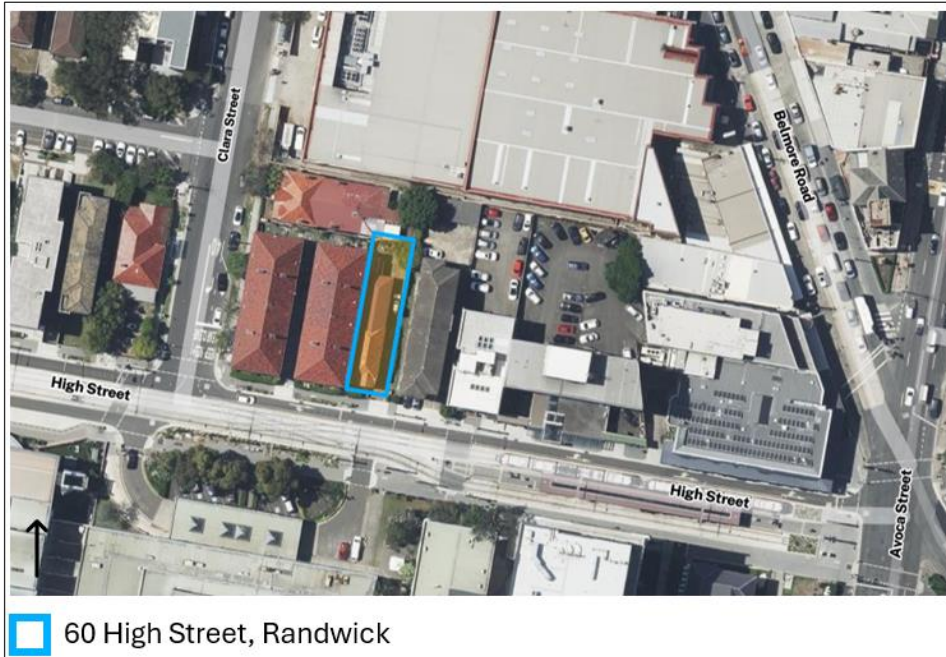
- Changes to proposed 'site categories' which informed the proposed controls
- Revisions to the proposed heritage incentive additional local provision
- Updates to the proposed minimum non-residential floor space
- Proposed rezoning of land at 60 High Street, Randwick (see below).

See **Section 4** of this report for the Department's assessment of the revised proposal.

Numerous administrative changes have also been made to the revised planning proposal and supporting documents to reflect post-Gateway changes, respond to planning reforms, updated population and employment projections, update housing targets, and correct errors. The updates are primarily administrative in nature and do not materially change the intended outcome of the proposal.

### Proposed rezoning of land at 60 High Street, Randwick

The revised planning proposal seeks to rezone land at 60 High Street, Randwick (**Figure 11**) from R3 Medium Density Residential to E2 Commercial Centre and amend the development standards that apply to the site under the Randwick LEP 2012.



**Figure 11 Subject land at 60 High Street, Randwick (Source: NSW SDT Explorer, September 2025)**

The revised planning proposal seeks to increase the maximum height of buildings from 12m to 40.5m and the maximum FSR from 0.9:1 to 3.5:1; apply a minimum non-residential FSR of 1.15:1 and apply an Affordable Housing Contributions rate of 3% (or equivalent monetary value) to the site.

This site is approximately 342 m<sup>2</sup> with frontage to High Street and is currently occupied by a one storey cottage used for health services.

Council considers the proposed rezoning of this site provides a logical extension to the town centre on the grounds that it would:

- *Reflect the existing pattern of retail/commercial uses*
- *Achieve a contiguous and consistent zoning pattern across the existing block*
- *Provide a defined edge to the business zoned land; and*
- *Strengthen RJTC by increasing opportunities for additional business uses/mixed uses to support future growth.* (Revised planning proposal, July 2025, p.41)

See Department's assessment, including consideration of consistency Ministerial Directions, in **section 4** of this report.

## 4 Department's assessment

The planning proposal has been subject to detailed review and assessment through the Department's Gateway determination.

The following section provides details of the Department's assessment of key matters and any potential impacts relating to the revisions to the planning proposal post-Gateway. It also assesses the revised planning proposal against relevant Section 9.1 Directions, SEPPs, Regional and District Plans and Council's Local Strategic Planning Statement, to confirm consistency with the assessment undertaken at the Gateway determination stage.

This assessment should be read in conjunction with the Department's Gateway assessment report.

### 4.1 Land subject to the revised planning proposal

As noted earlier in this report, the revised planning proposal excludes several sites to the west of the town centre which were proposed to be rezoned in the original planning proposal at Gateway (See **Figures 12 and 13**).

The sites excluded (post-Gateway) from the revised planning proposal include:

- 1, 3 & 5 Botany Street, Randwick
- 1, 3 & 5 Silver Street, Randwick
- 42 & 44 Waratah Avenue, Randwick
- 9 Arthur Lane, Randwick
- 63, 65, 67 & 69 Arthur Street, Randwick.

Council's report of 17 July 2025 justifies the exclusion of these sites from the revised planning proposal on the basis that the release of the NSW Government's Low and Mid Rise (LMR) Housing reforms will allow for an appropriate transition and relationship in building height to be achieved between the centre and adjoining R3 Medium Density Residential area.

Stage 2 of the NSW Government's LMR planning reforms came into effect on 28 February 2025 after the Gateway determination was issued. It introduced new planning controls into the *State Environmental Planning Policy (Housing) 2021 (the Housing SEPP)*.

As noted in this report, Randwick town centre and light rail station has been identified as an LMR housing area. Under the LMR reforms, new non-discretionary development standards apply to residential flat buildings on R3 Medium Density Residential zoned land in the LMR area, including a maximum FSR of 2.2:1 and maximum height of 22m / up to 6 storeys, within 400m of the station or centre.

The LMR non-discretionary standards for the sites excluded from the revised planning proposal are higher than what was proposed at Gateway. The Department is satisfied that the proposed exclusion of these sites will not impede the delivery of homes near the edges of the centre.



**Figure 12 Randwick Junction Town Centre Planning Proposal Boundary – at Gateway (Source: RJTC Draft Planning Proposal, May 2023)**



**Figure 13 Randwick Junction Town Centre Planning Proposal Boundary – Revised post-Gateway (Source: RJTC Revised Draft Planning Proposal, 11 July 2025)**

## 4.2 Strategic assessment

### 4.2.1 Need for the planning proposal

The revised proposal seeks to implement the vision of the Randwick Junction Town Centre Strategy (2020) and built form framework set out in the Randwick Junction Town Centre Urban Design Report 2023 (including the 2025 update), which were prepared in response to the actions of the Randwick Local Strategic Planning Statement. The planning proposal also responds to the improved accessibility provided by the light rail and seeks to balance development with local character and heritage conservation.

The revised planning proposal will facilitate up to 800 homes and 750 jobs over the next 20 years.

Rezoning and amending development standards require an amendment to the LEP. Additionally, under section 7.32(3)(b) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), any condition imposed on a development consent must be authorised to be imposed by an LEP and be in accordance with an affordable housing contribution scheme for dedications or contributions set out in, or adopted by, the LEP.

A planning proposal is the best mechanism for amending the Randwick LEP 2012 to achieve the objectives and intended outcomes for the Randwick Junction Town Centre, as the proposal cannot be delivered under the current planning controls.

## 4.3 Region, District and Local strategic plans

The Department's Gateway assessment report provides an assessment against relevant aspects of the overarching Greater Sydney Region Plan, Eastern City District Plan and relevant local strategic plans.

While there have been some changes made to the subject land, zoning, development standards and additional provisions proposed post-Gateway, the intent of the revised proposal remains largely the same as it seeks to enable the redevelopment of Randwick Junction Town Centre, while having regard to the centres existing heritage.

The revised proposal seeks to facilitate capacity for approximately 800 homes, including affordable housing, approximately 750 jobs, and a range of public benefits within a strategic centre and health and education precinct identified for employment growth and urban renewal.

The Department also notes that the proposal was updated in accordance with Gateway condition 1(f) to address the local housing strategy.

The Department is satisfied that the revised proposal remains consistent with the relevant district and local strategic plans per Department's Gateway assessment report.

## 4.4 Section 9.1 Ministerial Directions

**Table 5** provides an assessment of the revised planning proposal's consistency with relevant section 9.1 Directions is discussed as follows.

**Table 5 Assessment of revised proposals consistency with relevant Ministerial Directions**

| Direction                    | Consistent / Inconsistent / Unresolved | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------------|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.4 Site Specific Provisions | Inconsistent                           | <p>This direction seeks to discourage unnecessarily restrictive site-specific planning controls.</p> <p>Subclause 1(c) of this direction stipulates that a proposal must 'allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended'.</p> <p><u>Proposed non-residential FSR</u></p> <p>The Department maintains its position from Gateway that proposal to include a non-residential FSR for certain sites is justified as it provides certainty of the delivery and protection of commercial floor space in a strategic centre. The revised proposal is supported by feasibility analysis by SGS Economics and Planning (2025).</p> <p><u>Proposed affordable housing contributions scheme</u></p> <p>The proposal to permit the collection of affordable housing contributions (between 3% and 9%) on certain sites is justified as section 7.32 of the <i>EP&amp;A Act 1979</i> allows councils to levy contributions for affordable housing and any condition imposed on a development consent must be authorised to be imposed by a LEP. See assessment of this element of the proposal in <b>Section 4.5</b> of this report.</p> |

| Direction                 | Consistent / Inconsistent / Unresolved | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------|----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           |                                        | <p><u>Proposed additional local provision for heritage</u></p> <p>The revised planning proposal has amended the proposed additional local provision which originally sought to incentivise heritage restoration and conservation. The revisions seek to require development be supported by a heritage study and commit to the conservation and restoration of the historic fabric of buildings, and removal of any intrusive built form or architectural elements. The Department notes the revised provision no longer contains an incentive provision which is a significant change from what was proposed at Gateway.</p> <p>On 7 and 28 August 2025 the Department requested clarification on this element of the proposal and rationale for this post-Gateway change. On 11 September 2025 Council officers advised that a stronger and specific requirement regarding heritage is required for developments in the Randwick Junction HCA.</p> <p>The revised heritage provision is a duplication of existing clause 5.10 Heritage Conservation of the Randwick LEP 2012, which is a mandatory provision under the <i>Standard Instrument (Local Environmental Plans) Order 2006</i>. The revised heritage provision is inconsistent with the NSW Heritage framework and Planning Circular PS 21-012 which specifies that 'Local provisions may not deal with planning matters that are addressed by mandatory provisions in the standard instrument'.</p> <p>Additionally, there is no statutory pathway or policy to include a provision in the LEP requiring documents to be included in a development application.</p> <p>The proposed provision is considered inconsistent with the statutory framework, including the SILEP, and the terms of this Ministerial Direction. A <b>Gateway condition</b> is recommended that the proposed additional local heritage provision be omitted from the proposal prior to exhibition.</p> <p>Council may wish to consider whether there is a more appropriate mechanism to achieve its intended outcome outside of the LEP.</p> <p>Having regard to the above, the inconsistency of the revised planning proposal with Direction 1.4 is considered justified in accordance with the terms of the directions subject to the recommended Gateway conditions.</p> |
| 3.2 Heritage Conservation | Consistent                             | <p>This Direction seeks to conserve items, areas, objects and places of environmental heritage significance and indigenous heritage significance.</p> <p>In addition to the reports provided at Gateway, the revised proposal is also supported by Statement of Heritage Impact – Addendum to Heritage Assessment for Randwick Junction Town Centre Planning Strategy, May 2023 (City Plan, 10 July 2025).</p> <p>Subject to amendments to comply with the recommended Gateway conditions, the revised planning proposal is considered consistent with this Direction as it does not seek to amend the boundary of the existing Randwick HCA or existing heritage items, nor does it seek to reduce the ongoing application of existing LEP provisions for their conservation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

| Direction    | Consistent / Inconsistent / Unresolved | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 4.1 Flooding | Inconsistent                           | <p>Direction 4.1 Flooding seeks to ensure that development of flood prone land is consistent with the Government's Flood Planning Framework and ensure LEP provisions are commensurate with the flood behaviour and consider the potential impacts on and off the land.</p> <p>A planning proposal must not contain provisions that permit development in floodway areas, development for the purposes of residential accommodation in high hazard areas, nor permit significantly intensify development in a flood planning area.</p> <p>The subject land and surrounding area are identified as being flood prone in 1% AEP and PMF flood events. This direction applies as the proposal seeks to alter the development standards that apply to land identified as flood prone.</p> <p>This Direction was unresolved at the Gateway determination stage until further work was undertaken.</p> <p>The revised planning proposal includes additional information to address the direction and is supported by Randwick Planning Proposals – Flood Constraints Assessment (BMT, 5 June 2025) (See <b>Figures 14 to 19</b>).</p> <p>The Flood Constraints Assessment noted that the majority of lots in the centre are not located within the flood planning area, with the centre predominantly affected by minor, shallow overland flow which is mostly contained within the existing road reserves under 1% AEP and PMF flood conditions. Though there are properties that contain flood fringe or flood storage areas, no land identified for uplift is in a floodway.</p> <p>The BMT report identified high flood depths on land at 2 Albert Street (155 Avoca Street), 57 – 63 Belmore Road and 73 – 109 Belmore Road, where there are highly localised areas of 1% AEP flood with a depth greater than 0.15 m and up to 1.0m.</p> <p>High hazard flooding at 2 Albert Street, Randwick, is likely a result of trapped low points from which water cannot easily drain. Future design which caters for these low points may be able to mitigate the flooding on site but would likely require a detailed flood impact and risk assessment to be undertaken.</p> <p>The report includes recommendations for evacuation and preparation of flood emergency strategies. The BMT report notes that the majority of the area would be suitable for a shelter-in-place response to flooding.</p> <p>The revised proposal is inconsistent with this Direction as it contains provisions which seek to permit a significance increase in the permissible development density on land that has been identified as flood prone.</p> <p>The Department of the view that the inconsistency is justified in accordance with the terms of the direction for the following reasons:</p> <ul style="list-style-type: none"> <li>• The revised proposal is supported by a flood impact assessment which has regard to the NSW Flood Planning Framework.</li> <li>• The centre is located within a highly urbanised environment, and the revised planning proposal seeks to facilitate growth that can</li> </ul> |

| Direction | Consistent / Inconsistent / Unresolved | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           |                                        | <p>be reasonably expected in strategic centre and is consistent with the strategic framework and the objectives and permissible uses in the zone.</p> <ul style="list-style-type: none"> <li>Having regard to the existing flood planning provision (cl.5.21) contained in the LEP and existing policies for managing flood risk and emergency evacuation, the Department considers that potential flood risks associated with the future development can be adequately mitigated and managed through existing assessment processes.</li> </ul> <p>DPHI is satisfied that the outstanding matters have been addressed sufficiently to allow the planning proposal to proceed.</p> <p>Notwithstanding, the above, a <b>Gateway condition</b> is recommended that Council consult with the NSW State Emergency Services (SES).</p> <div data-bbox="568 846 1410 1429"> </div> <p><b>Figure 14 Randwick Junction Town Centre (View A) – Peak Flood Hazards – 1% AEP Event (Source: BMT, 5 June 2025)</b></p> |

| Direction | Consistent / Inconsistent / Unresolved | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           |                                        | <div><p><b>Figure 15 Randwick Junction Town Centre (View A) – Peak Flood Hazards – PMF Event (Source: BMT, 5 June 2025)</b></p></div> <div><p><b>Figure 16 Randwick Junction Town Centre (View B) – Peak Flood Hazards – 1% AEP Event (Source: BMT June 2025)</b></p></div> |

| Direction | Consistent / Inconsistent / Unresolved | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           |                                        | <div></div> <p><b>Figure 17 Randwick Junction Town Centre (View B) – Peak Flood Hazards – PMF Event (Source: BMT, June 2025)</b></p> <div></div> <p><b>Figure 18 Randwick Junction Town Centre (View C) – Peak Flood Hazards – 1% AEP Event (Source: BMT, June 2025)</b></p> |

| Direction                                        | Consistent / Inconsistent / Unresolved | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                  |                                        |  <p><b>Figure 19 Randwick Junction Town Centre (View C) – Peak Flood Hazards – PMF Event (Source: BMT, 5 June 2025)</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 4.4<br>Remediation<br>of<br>Contaminated<br>Land | Consistent                             | <p>The direction seeks to reduce the risk of harm to human health and the environment by ensuring that contamination and remediation are considered by planning proposal authorities.</p> <p>The Direction applies as the revised proposal seeks to rezone land for commercial centre and public recreation purposes.</p> <p>The revised planning proposal includes updates to Part 3 Section B 'Relationship to strategic framework' which identifies consistency with Direction 4.4. The Draft Contamination Desktop Study for the Randwick Junction Town Centre (18 December 2024), prepared by JK Environments concludes that the site can be made suitable for future development, subject to the completion of the further assessments (and remediation where required).</p> <p>Chapter 4 of <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> contains provisions that will ensure that any potential contamination is suitably addressed through the development application process.</p> <p>The proposal is consistent with this Direction.</p> |
| 6.1<br>Residential<br>zones                      | Inconsistent                           | <p>This Direction aims to encourage housing choice, make efficient use of infrastructure and services, and minimise the impact of residential development on environment and resource lands. The Direction also encourages a broad variety of housing types to be available.</p> <p>As previously noted, the revised planning proposal has been amended post Gateway to enable the proposed rezoning land at 60 High Street from R3 Medium Density Residential to E2 Commercial Centre, which will reduce the permitted housing types on the land. However, shop top housing is permissible in the proposal zone and the revised proposal</p>                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Direction | Consistent / Inconsistent / Unresolved | Department comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           |                                        | <p>seeks to facilitate increase jobs and homes by increasing height and FSR controls.</p> <p>Per the Gateway assessment report, the Department remains of the view that the inconsistency is justified as the revised planning proposal:</p> <ul style="list-style-type: none"> <li>• creates capacity of up to 800 homes</li> <li>• will not reduce the permissible residential density of the land as residential uses such as shop top housing, are permissible within the E2 zone and the proposal would allow uplift on the sites proposed to be rezoned</li> <li>• facilitates housing choice and affordable housing</li> <li>• facilitates higher density outcomes to make efficient use of existing infrastructure and services</li> <li>• is consistent with the District Plan and LSPS.</li> </ul> <p>The inconsistency with the Direction is adequately justified.</p> |

## 4.5 State environmental planning policies (SEPPs)

### 4.5.1 SEPP (Housing) 2021

Section 7.32 of the *EP&A Act 1979* allows councils to levy contributions for affordable housing if a SEPP identifies a need for affordable housing in the LGA. Section 14 of the Housing SEPP identifies Randwick LGA as an area in need of affordable housing.

Under section 7.32(3)(b) of the *EP&A Act 1979*, any condition imposed on a development consent must be authorised to be imposed by a LEP and be in accordance with an affordable housing contribution scheme for dedications or contributions set out in, or adopted by, the LEP.

As previously outlined in this report, condition 1(c) of the Gateway required that Council amend the planning proposal and draft Affordable Housing Contribution Scheme, to be consistent with the Department's *Guideline for Developing an Affordable Housing Contribution Scheme* and be supported by adequate information demonstrating that the proposed rates are viable at the proposed FSRs.

The Department's *Guideline for Developing an Affordable Housing Contribution Scheme* (the Guideline) (February 2019) provides guidance on the preparation of affordable housing contribution schemes (AHCS) and to fulfill legislative requirements.

The revised planning proposal seeks to introduce a local provision to permit the collection of affordable housing contributions (3% to 9% or equivalent monetary contribution payment) on certain land in the centre. It is supported by a Draft Randwick Junction Affordable Housing Plan which is generally consistent with the approach undertaken by Council to date for its existing affordable housing contribution schemes for town centres in the LGA. Council publishes information for its existing schemes and the applicable monetary rates on its website.

It is noted that in addition to identifying the proposed contribution rates the revised planning proposal includes text referring to a sliding scale basis (p.20). A **Gateway condition** is recommended that the proposal be updated prior to exhibition, to clarify that the affordable housing contribution rates are the specific rates proposed for certain sites identified on the draft Special

Provisions Area Map which are fixed percentages to mitigate any potential for the intent of the proposal to be misinterpreted.

Furthermore, it is recommended that Council review the revised planning proposal and AHC Plan to ensure they are consistent and reflect the updated information provided in response to the Department's requests for additional information.

The proposed AHCS is supported by the Randwick Junction Town Centre Development and Affordable Housing Contribution Feasibility Testing report (2025), prepared by SGS Economics and Planning Pty Ltd (this document was provided to the Department as commercial in confidence).

The Department is satisfied that Council has adequately demonstrated a need for affordable housing and that the mechanism for securing an affordable housing contribution via the LEP is appropriate and adequately justified in accordance with the relevant Guidelines.

The revised proposal does not contain provisions that would hinder the application of the SEPP.

## 4.6 Site-specific assessment

### 4.6.1 Environmental

The Department's Gateway assessment report contains an assessment of environmental impacts. It found that given the need to respond to the housing crisis and the centre's status as a strategic centre, Council should reconsider the planning controls, subject to heritage assessment.

The revised planning proposal seeks an increase in the height and FSRs for various sites across the centre since Gateway. The proposal notes that this has been informed by analysis of development feasibility, built form and urban design modelling, key view analysis and architectural heritage review and consideration of the LMR reforms and requirements of the NSW Apartment Design Guide.

The Department also notes Councils intention to exhibit concurrently, a supporting draft site-specific Development Control Plan (DCP) that incorporates detailed guidance for built form outcomes, including matters relating to design excellence, built form and building envelope, and building depth, bulk and setbacks.

The Department considers the potential bulk, scale, solar access and visual impacts have been adequately considered through extensive built form analysis and testing and that the potential impacts are acceptable in the context of a strategic centre. Per the original Gateway assessment, the Department maintains the view that the revised proposal does not prevent further consideration of any potential impacts at the development application stage.

For abundant clarity during consultation, all supporting technical reports, including any updated urban design report and overshadowing analysis, should be publicly exhibited with the revised planning proposal package for the community to understand the impact and intended outcome of the proposal.

See assessment of ministerial directions above for consideration of flooding, contamination and heritage.

The Department is satisfied, subject to the recommended Gateway conditions, that the revised planning proposal has adequately addressed environmental impacts.

### 4.6.2 Social and economic

While there have been some changes made to the proposal post-Gateway, the Department maintains its position at Gateway that the revised proposal has the potential to generate positive social impacts by delivering homes and jobs in a well-located area and has adequately considered economic impacts.

The revised planning proposal is supported by technical studies, including updated feasibility testing which has informed the updates to the proposed increases in height, FSR and affordable housing contribution rates.

#### 4.6.3 Infrastructure

The Department's Gateway assessment report contains an assessment of impacts on infrastructure.

## 5 Consultation

The Department considers the community consultation requirements set out in Condition 4 of the Gateway determination (which have not yet been met) to be sufficient and does not recommend altering the Gateway determination to impose additional or different community consultation requirements.

Notwithstanding, given the proposal seeks to alter the development standards that apply to land occupied by the Randwick Police Station, it is recommended that NSW Police are consulted. An amended Gateway condition is recommended to this effect.

## 6 Timeframe

The Gateway determination required that the LEP be completed on or before 14 November 2025. Council will not be able to meet this timeframe.

It is recommended that the LEP completion date is extended to 26 June 2026. This will give Council time address the Gateway condition, undertake consultation, consider submissions, arrange for legal drafting and make the LEP. This date also takes into account the December 2025/January 2026 holiday period.

Compliance with milestones will be monitored by the Department to ensure the planning proposal is progressing as required.

Should Council seek to make the proposed LEP, the request to draft the LEP should be made directly to Parliamentary Counsel's Office well in advance of the LEP completion date.

## 7 Assessment summary

The revised planning proposal is supported to proceed with conditions for the following reasons:

- It is generally consistent with the relevant overarching state and local strategic plans and policies and ministerial directions, and inconsistencies have been adequately justified
- It will facilitate job growth within a strategic centre and support the ongoing viability of the Randwick Junction Town Centre.
- It is consistent with the NSW Government's commitment to housing affordability and will facilitate up to 800 homes.
- It will support the provision of affordable housing in the Randwick LGA.
- It has given consideration to the likely environmental, social and economic, and infrastructure.

## 8 Recommendation

It is recommended the delegate of the Secretary:

1. Agree that any inconsistency with section 9.1 Directions 1.4 Site Specific Provisions, 4.1 Flooding, 6.1 Residential Zones and 7.1 Employment Zones is justified in accordance with the terms of the Directions.

It is recommended the delegate of the Minister determine that the revised planning proposal should proceed subject to the following conditions and to alter the Gateway determination for planning proposal PP-2023-2235.

1. Delete:  
 “The LEP should be completed on or before 14 November 2025”  
 and replace with:  
 “The LEP should be completed on or before 26 June 2026”.
2. Delete Condition 2 and replace with a new Condition 2:  
 “2. Prior to community consultation, the planning proposal is to be updated to:
  - (a) Note the evidence base which supports the post-Gateway changes to the proposed non-residential uses FSR controls.
  - (b) Correct the anomaly identified in the proposed controls for Lot 1 in DP822327
  - (c) Clarify the proposed controls for land at 128 Belmore Road, Randwick and ensure they are consistent with the intended outcomes and explanation of provisions.
  - (d) Ensure all supporting maps accurately reflect the existing and proposed controls and the intended outcome of the planning proposal
  - (e) Remove all references to the proposed additional local provision for heritage
  - (f) Clarify that the affordable housing contribution rates are the specific rates proposed for certain sites identified on the draft Special Provisions Area Map which are fixed percentages, to mitigate any potential for the intent of the proposal to be misinterpreted
  - (g) Ensure the planning proposal and AHC Plan are consistent and reflect the additional information submitted separately
  - (h) Ensure all references to repealed SEPPs and policies, including the former SEPP 65, are removed and updated to be current.
3. Delete Condition 3 and replace with a new Condition 3:  
 “3. Consultation is required with the following public authorities and government agencies under section 3.34(2)(d) of the Act and/or to comply with the requirements of applicable directions of the Minister under section 9 of the Act:
  - Transport for NSW
  - NSW Health – South Eastern Sydney Local Health District
  - University of NSW
  - Relevant utility providers, including Sydney Water and AusGrid.
  - NSW Police
  - NSW State Emergency Services
  - Heritage NSW.

Each public authority is to be provided with a copy of the planning proposal and any relevant supporting material via the NSW Planning Portal and given at least 30 working days to comment on the proposal.



Kelly McKellar

Manager Local Planning and Council Support (North, East and Central Coast)



24 October 2025

Jazmin van Veen

Director, Local Planning (North, East and Central Coast)

Assessment officer

Claire Mirow

Senior Planning Officer, Local Planning and Council Support (North, East and Central Coast)