

5 March 2026

Mr Dylan Parker
Mayor
Randwick City Council
Administration Building & Customer Service Centre
30 Frances Street
RANDWICK NSW 2031

Sent to: council@randwick.nsw.gov.au

Dear Mayor Parker

Randwick Development Control Plan (DCP) – Stage 2

I write in response to the public exhibition of the Randwick DCP.

While Urban Taskforce Australia appreciates efforts by councils to ensure that planning controls are up to date and appropriate for their LGAs, the stage 2 DCP appears to be a cynical attempt to raise the bar so high that nothing can ever be built.

Anti-development development controls

The draft DCP documents demonstrate the level to which Randwick City Council is prepared to obstruct and discourage development.

Measures adopted within the Plan appear to be deliberately designed to make the delivery of housing more complicated and expensive, significantly undermining feasibility and making local projects untenable.

In the midst of a housing supply crisis, with Randwick delivering less than half the dwellings it needs under the National Housing Accord, the DCP throws an array of restrictions, barriers, and costs at development that will disincentivise even the most passionate builder.

The result is volumes of “feel-good”, virtue-signalling positions that will lead to almost no new development.

While that may be the unspoken goal of the process, industry would have hoped that a council that claims to want “high quality, well-designed development” would deliver more than just the status quo.

The rigid expectations of Council's DCP, and the complexity and cost they will create for any development project, are essentially going to result either in building stock continuing to age and degrade or the NSW Government stepping in to override the proposed barriers.

The development industry supports the delivery of good quality housing, but Urban Taskforce is concerned that Council has attempted to take an extreme position so that proponents decide against submitting applications.

If, as the Randwick Junction Town Centre Planning Proposal appeared to suggest, Council is keen to deliver more housing affordability and to create opportunities for

key workers, the proposals within the DCP will take the LGA a long way from those goals.

Urban Taskforce Australia believes that Council should be more pragmatic and look to facilitate, rather than frustrate, future development within its LGA.

Where is the housing?

The draft DCP has the following lofty goals, namely to:

- *“Protect our heritage and celebrate local character*
- *Design climate-resilient, energy-efficient homes*
- *Green our city with more trees and landscaping*
- *Support local businesses and vibrant public spaces*
- *Enhance liveability by guiding development that creates safe and enjoyable places for people.”*

Absent from this list is the delivery of new housing – “homes” are mentioned only in the context of climate resilience and energy efficiency, not in terms of addressing housing supply, notwithstanding the new objectives of the EP&A Act which include housing supply per se. This change was supported by both sides of the political fence in the NSW Parliament and should be reflected in this document.

Even affordable housing, which in other documents has been a key driver for Randwick City Council, is absent from the priorities of the DCP.

Urban Taskforce is concerned to not give support to DCP changes that seek (either deliberately or inadvertently) to preserve Randwick as a museum piece. It should be a vibrant, changing community that focuses on future growth and improvement, rather than clinging to the past.

From the outset, Council has made it clear that new housing is not a significant driver for local planners.

Recommendation 1: That Council make residential development and increasing housing supply a key focus of the draft DCP and facilitate new housing delivery.

Reducing feedback

Urban Taskforce Australia notes that not one of the 43 draft documents provided any indication as to what Council proposes to change.

Hundreds of pages of development controls have been provided that give readers no information about what has been amended.

This obfuscatory approach to consultation compels respondents to undertake significant “detective work” to establish the differences between the previous DCP and the current version.

Combined with the format in which the documents were presented – saved as an image, leaving no ability to do a word search of each document or to copy text – this has reduced the ability of the public to assess the changes accurately and to

determine what impact they will have on development and the broader community.

Urban Taskforce recommends that this process of consultation be extended with searchable documents provided and with tracked changes shown to enable a clear understanding of what has changed.

Given this, our response may address controls that are already in place, but we have assumed that all elements in the draft DCP are on the table for discussion.

Recommendation 2: That Council re-exhibit the proposed changes with documents that are in a searchable PDF format, with tracked changes to show the amendments being made.

B1 Local Character

Council has provided local character statements for the whole LGA, tempered in part by Part D location development controls.

On initial reading, Council could be commended for providing far more detail than other councils, allowing some degree of measurability.

However, in the Character Principles section (part 2), for example, Council appears to be running with a few hand-picked themes (see bolded cut out below):

1. Retain and enhance the **unique character** of each locality
2. Ensure future development supports the intended outcomes identified in the Desired future **character** statement for the relevant **locality**
3. Ensure development reflects the **cultural** significance of **place** by responding to **cultural heritage** values, supporting **community**-led placemaking, and fostering inclusive spaces that honour both historical and contemporary Aboriginal presence
4. Development should respond to the **unique character** of **place** by respecting its **cultural** foundations, engaging with **community** knowledge, and incorporating meaningful references to the stories, traditions, and values that continue to define it, through both **community** association and ongoing **cultural practices**
5. Ensure new development makes a positive contribution to the surroundings
6. Development is to respond to the existing fabric and **character** of each area, using scale, proportion, materials, landscaping, landscape elements, front gardens, site layout, built form, architectural refinement, **streetscape** relationships, fencing, roofscapes, **view** lines and vistas, to reinforce the distinctive **character** of the area
7. Development is to respond to and compliment both **heritage items** and **contributory buildings** within **heritage** conservation areas, including **streetscapes** and laneways
8. Protect and enhance **contributory buildings, heritage items**, and their settings
9. Ensure the amenity of public domain is not compromised by out-of-**character** new development or intrusive built form

10. Retain and respond to the prevalent lot pattern and **streetscape** proportions
11. Maintain street presentation and reinforce the spacing between buildings through appropriate **setbacks**, building footprints, and building envelopes
12. Infill development is to respond to the height, massing, and predominant horizontal and vertical proportions of **heritage items** and **contributory buildings**
13. Ensure local and district **views** are retained from public and private land
14. Maintain and strengthen the landscape settings of buildings and streets, while retaining and improving continuous tree canopy along streets and across backyards
15. Ensure access and connectivity within, to, and from an area are supported by an integrated transport network that is safe, efficient, and responsive to local movement priorities
16. Ensure new driveways, carports, garages, and car spaces are not detracting from the existing and/or desired future **character** of the locality
17. Encourage a high quality of building detailing and materiality that references and responds to details and materials of buildings in the area, without mimicking
18. Conserve existing uses and ensure proposed land uses are complementary and contribute towards **local character** and **community needs**
19. Support demographic diversity by safeguarding land uses that reflect and sustain the established local **character**, including housing types, **community facilities**, and commercial activities that serve established diverse population groups

The document detail key characteristics and development guidelines that are themselves duplicated in full or part throughout eleven character statements. It reads as if there were cash bonuses being offered for the number of times certain key terms were used. The document is replete with unnecessary duplication and as a result, is unnecessarily long.

For example, almost every local character statement includes the requirement in the development guidelines to:

“Encourage high quality and contemporary design that references without mimicking existing building design and materiality including the use of masonry construction, stucco rendering, sandstone, slate, and terra cotta tiled roofs”

Bunnerong Creek, The Bays, Bundock Street, and The Port have variations of that statement.

Similar results can be found with many of the other controls.

The point is that, notwithstanding slight tweaks to the phrases used, the key message is that all areas need to be treated more or less the same, with a handful of locally specific needs.

Somehow, a developer hoping to build in Randwick LGA is to:

- retain and conserve heritage items, contributory buildings, and HCAs, including streetscapes;

- sensitively design buildings to respond to and complement the historic architectural, social, and environmental significance, **including streetscape**, of these heritage items, contributory buildings, and HCAs;
- offer “innovative and contemporary design responses while complementing the existing building form”; and (at the same time)
- not “mimick” building design.

These provisions appear to be the planning version of having one's cake and eating it too – you cannot detract from heritage, but you must not “mimick” it in your design. Similarly, you have to complement the streetscape but must use innovative and contemporary design - at the same time.

Subdivision patterns and existing streetscapes must be preserved, and there is to be no “monolithic massing” works against the need for urban consolidation and housing supply obligations of Council.

Various areas of Randwick LGA are said in this document to have “unique” topography, “unique” subdivision patterns, or “unique” green character – whether unique to Randwick or unique to the world is not stated, nor clear.

This uniqueness lends Council to take responsibility for areas not within its purview, such as UNSW Kensington Campus (Federal Crown land) and Randwick Racecourse (State Crown land), where it appears to plan to compel the owners to create “indigenous ecologies” with the “plantings of local species at varying scales”, but does not explain how or to what extent.

Applicants must address the character principles, desired future character statement, key characteristics, and development guidelines in their application, proportionately to the scale of the proposed development, meaning even more reporting, adding to the cost and time taken to deliver new housing.

Recommendation 3: That Council streamline and reduce the local character areas document to remove duplication and remove inconsistencies. The primacy of the importance of housing supply over the preservation of local character should be explicitly recognised to ensure consistency with the objectives of the EP&A Act (as amended in 2025).

B2 Heritage and B3 Sustainability and resilience

Council's description of the amendments made to these documents is that they are designed to:

- improve clarity and consistency for heritage conservation and to create; and
- integrate sustainable practices into new development, mitigating urban heat island effect and responding to climate change impacts.

No detail is provided as to how these will be achieved, and no indication has been given as to what has changed in the document.

In the time available it was not possible to undertake a forensic comparison of these versions against their predecessors, and the format of the document (apparently saved as an image) would mean that any such effort would be a pointless, time-consuming exercise.

Suffice it to say, the controls within these documents place significant restrictions on development – even on neutral buildings – and create more compliance red tape.

On the sustainability front, the measures included within the DCP seek to control all elements of the design and construction of buildings – including the push for “designing for disassembly” – suggest that Council is prescribing a level of green tape prescription that will make many projects virtuously unfeasible.

Recommendation 4: That Council remove some of the heritage and sustainability prescriptions within the DCP to make it less onerous for developers to deliver housing supply to the LGA.

B7 Transport and parking

The DCP continues Council's emphasis on “active” transport and the use of public transport services.

It curtails off-street parking and makes new residents into a second-class citizenry by depriving them of resident parking permits, as a condition of consent. It is questionable whether this is legal, as affected ratepayers may be in their rights to seek a reduction in rates to match the inconvenience.

It is Council deciding, without evidence, that residents do not need their cars.

Urban Taskforce members advise that there remains a strong consumer preference for car ownership. Those with families who require a car for shopping or to get children to sport or out-of-school tuition etc, those that are employed in shift work, those whose workplace changes regularly, those who cannot get to their place of employment by public transport, those who rely on their car to undertake their work – are far higher a proportion of the community than foreshadowed by this document and the controls within it.

Not only does the proposed DCP deprive residents of rights they would otherwise have in other locations, but it makes new residential developments less attractive to purchasers, and consequently less feasible.

Although access to public transport may reduce some vehicle use, a variety of people may have reasons for needing access to a car – tradespeople working in different locations, people performing shift work, families taking children to after school or weekend activities, etc. It is not up to councils to decide if and how a resident might need to access a private vehicle.

(We note that Randwick City Council is not proposing to close the carpark at its Administration Building, to compel staff to catch public transport.)

To enforce this transport diktat, and to burnish its sustainability credentials, Council is applying an array of strategies, such as requiring developers to:

- incorporate “measures that increase the share of trips made by public transport, walking, and cycling”;
- provide onsite bicycle parking in addition to other parking requirements, with a minimum of 25% of spaces capable of E-bike charging;
- include flexible hardstand areas to support bicycle maintenance and repair;

- provide 24h public access car share spaces in residential, mixed use, shop top housing, co-living, and/or commercial development where public transport accessibility is high (and requiring a legal agreement with a recognised car share provider must be submitted with the DA); and
- include EV charging for 10% of all parking spaces.

Applicants have to jump through hoops to get approvals for parking, with DAs having to be accompanied with some or all of:

- a "Green Travel Plan";
- a Transport Impact Assessment;
- a Parking and Access Study;
- a Delivery and Servicing Plan;
- a Construction Traffic Management Plan; and/or
- a response to criteria in Section 8 (Exceptions to Parking Rates) if proposing a variation to car parking rates.

This is an extreme level of reporting for one area of an application, adding to the cost and time taken to prepare and submit a DA.

Even if parking is approved, some restrictions on multi-dwelling parking allowances can reduce feasibility even further.

In the Kingsford to Kensington, Randwick Junction Town Centre, and Well-Located Housing Areas (henceforth known as "the restricted areas"), carparking allowances drop by around 40% – a development of ten 1-bedroom and ten 2-bedroom apartments would drop from 22 parking spaces in most of Randwick LGA to just 14 parking spaces in those areas. As 1 out of every 12 parking spaces must be dedicated for motorcycles in these areas (5% of spaces in other parts of Randwick), it would leave just 13 parking spaces for the development.

While those numbers are minimums, if a developer were to seek more parking spaces – to accommodate the residents who cannot qualify for resident parking permits – it would come out of the project's GFA. This would eat further into feasibility and undermine housing supply.

To compensate for any shortfall in parking is to increase bicycle parking. The DCP will require shop top developments, multi-dwelling housing, and residential flat buildings to provide at least one space per 2 units and a visitor bike space every 10 units.

Despite these being residential premises, the developer will also have to provide showers for 0-12 units (1 shower); 13-49 units (2 showers); 50-149 units (4 showers), and 2 change rooms (one male/one female) where there are 13 or more staff. Again, these are RESIDENTIAL properties.

In the restricted areas, there is no requirement to provide showers and change rooms in residential buildings. This is supported.

However, the rate of bike parking increases – 1 per unit, plus a visitor bike space for every 10 units. So, in our scenario, while development would have parking for just 13 cars and one motorbike, it would require parking spaces for 22 bicycles (and the hardstand for repairs, as noted above).

While Council claims that this part of the DCP has been "updated to reflect relevant legislation, state policy, regulations and standards, including parking requirements for co-living developments", it would appear that the restrictions are more than just "state policy".

Recommendation 5: That Council increase and make flexible parking allowances within the Randwick LGA, reduce the prescribed bicycle parking requirements, and remove the restriction on new ratepayers accessing resident parking permits.

B14 Communications and power lines

It would appear that Council wants power lines underground, and that it sees developers as the funding source for that outcome.

While it is not clear from the document what has changed, the suggestion that developments exceeding \$10m or 12 dwellings be required to pay for powerlines to be laid underground, appears to suggest that Council has no qualms about the additional cost to a project and increase in housing costs that such a prescription might cause.

This requirement needs to be revisited to ensure that the cost is not going to be prohibitive and won't unnecessarily drive up development expenses.

Putting wires underground serves Council's priorities well, but at whose expense?

Recommendation 6: That Council remove the requirement for developments to put communications and power lines underground.

B15 Public art & creative hoardings

Urban Taskforce strongly objects to the proposed 1% public artwork levy.

At 1% of development costs, added to the Council's 3% affordable housing levy (in Randwick Junction, at least), this is going to put a lot of pressure on projects and will undermine feasibility.

These developers will also have to find funds for creative hoardings, adding extra expense to development.

Recommendation 7: That Council remove, or significantly reduce, the public artwork requirement proposed for developments of \$10m or more.

C2 Medium density residential

This development control document makes a lot of values-based statements that don't appear to be accurately assessed for their likely impacts on development.

The document does not specify what changes have been made and, despite claiming to address the NSW Government's Low- and Mid-Rise (LMR) housing policy, the proposed controls appear to make it harder, not easier, to build higher density housing.

So, while projects must:

- provide “high quality housing” that meets local housing needs;
- exceed the minimum standards of the ADG (which itself is only a guideline, not a standard);
- create a “positive street level environment”;
- support active transport (walking and cycling);
- respect “the fine-grain character of heritage items and contributory buildings”;
and
- promote excellence in urban design, with “best practice” environmentally sustainable principles,

these “principles” aren’t aimed at making housing more affordable or projects more feasible.

In addition, applicants must sign up to a MINIMUM three-year 100% renewable power contract and provide evidence of it at the DA stage, further committing the developer to costs that will be passed on, but without any attempt to determine whether new home buyers would support such a move.

Council recognises that some of its proposals – such as restrictions on FSR – are likely to be overridden by the LMR policy but doesn’t use that risk as motivation to deliver more realistic development controls.

More reasonable and practical controls are possible, and Council would be well advised to engage with local developers to see what is feasible.

Recommendation 8: That Council review the proposed medium density residential development controls to determine their impact on feasibility and to create more realistic requirements by: removing the requirement for three years of renewable power; and aligning the DCP controls with the provisions of the LMR SEPP.

C4 Co-Living (including student housing) & boarding houses

The Co-living requirements were released for public consultation prior to the Council’s recent vote on placing a moratorium on co-living development.

Please see attached a copy of the Urban Taskforce submission on this matter.

Recommendation 9: That Council clarify the implications of its recent moratorium on co-living accommodation.

C10 Industrial areas

This paper is purported to have “updates to design requirements for industrial sites to ensure high-quality built form, landscaping, lighting and environmental controls, maximising energy efficiency, protecting amenity of neighbouring properties and ensure suitable vehicle access and egress”.

There is no detail provided as to what has changed, and it is difficult to understand the impacts of these proposals in isolation.

Recommendation 10: That Council identify clearly what has changed within the industrial areas document, so that industry can effectively analyse the potential impacts.

Conclusion

Urban Taskforce Australia appreciates the effort that Randwick City Council has gone to in order to update its DCP.

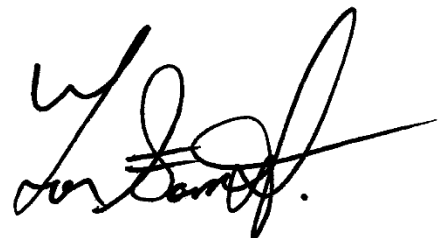
However, we are concerned that these documents have been amended without an acknowledgement of the potential impacts of the proposals on industry and on the delivery of affordable housing supply.

We note that affordable housing has not been discussed within the papers and are concerned that these changes are being pursued without understanding how they will affect current affordable housing levies and what the ultimate impact of escalating compliance requirements and costs will have on project feasibility.

We urge Council to review the draft DCP carefully and to make changes now that will remove barriers to development and facilitate the housing supply needed to support the Randwick community.

Should you wish to discuss any aspect of this submission further, please contact our Policy, Planning and Research Analyst, Paul Waterhouse, on 0411-875-366 or via email at paul@urbantaskforce.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a stylized flourish extending from the end.

Tom Forrest

Chief Executive Officer

Attachment: Randwick Co-living housing submission