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12 August 2025
Ms Kiersten Fishburn
Secretary
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square,
12 Darcy Street
Parramatta NSW 2150

Dear Kiersten,

Re: Request for Industry-Specific Secretary's Environmental Assessment Requirements (SEARs) – 16 -24 Belmore Road, Randwick.

This letter provides details to enable the Department of Planning, Housing and Infrastructure (DPHI) to issue Industry Specific SEARs in advance of the forthcoming State Significant Development Application (SSDA) for the development of land at 16-24 Belmore Road, Randwick.

The Housing Delivery Authority (HDA) recommended to the Minister that the project (EOI – 261914) be declared SSD on 15 July 2025 under s4.36(3) of the Environmental Planning and Assessment Act 1979 (EP&A).

The SSDA seeks consent for the erection of a 15 storey, shop top housing development consisting of a minimum of 104 apartments, including 15% affordable housing for 15 years, and commercial floor area podium and a concurrent rezoning for height and floor space ratio (FSR) uplift.

Industry-specific SEARs only apply to State Significant Development (SSD) applications other than those that:

- Would be designated development but for the Act, section 4.10(2), or

- Are partly prohibited by an environmental planning instrument (EPIs), or
- Are wholly prohibited by an EPI, to the extent permitted by the Act. Section 4.38(5), or
- Are a concept development application for State Significant Development.

Table 1 and 2 below confirm the Proposal's compliance with the qualification requirements for Industry Specific SEARs and provide the Proposal's key details, respectively.

We trust that the above summary provides DPHI with necessary information to understand that the project and issue Industry Specific SEARs.

Please don't hesitate to contact me regarding this request.



Giovanni Cirillo
Managing Director
giovanni@plannniglab.com.au
m. 0447755799



Table 1 – Industry Specific SEARs Qualifications

Is the project?	Yes/No
Designated development but for the Act, section 4.10(2)	No
Partly prohibited by an environmental planning instrument (EPI)	No
Wholly prohibited by an EPI, to the extent permitted by the Act, section 4.35(5)	No
A concept development application for state-significant development	No

Table 2 – Project Details

Applicant	Giovanni Cirillo
Proposed Land Uses	Residential Accommodation – Shop Top Housing – Residential Apartments (including affordable housing) and Ground Floor Commercial
Land Ownership	Belmore Road Property Nominees Pty Ltd ACN 612 531 718
Site Location and Existing Development	The site is located on the following properties: • 16-18 Belmore Road – Lot 1 DP 71301 • 20 Belmore Road – Lot 1 DP 945707 • 22-24 Belmore Road – Lot 1 DP 1043699





Figure 1 – Site Area (Source: NSW Explorer Maps)

Site Context and Surrounding Development

The site is within the block bounded by Belmore Road (east), Alison Road (north), Silver Street (south) and Elizabeth Street (west) within the Randwick City Council Local Government Area (LGA), at the northern end of the Randwick Town Centre. It has an irregular shape and occupies an area of approximately 1,640m². Existing development on the site consists of 2-3 storey, mixed use, shop top housing buildings, with a ground floor retail frontage and awning along Belmore Road.

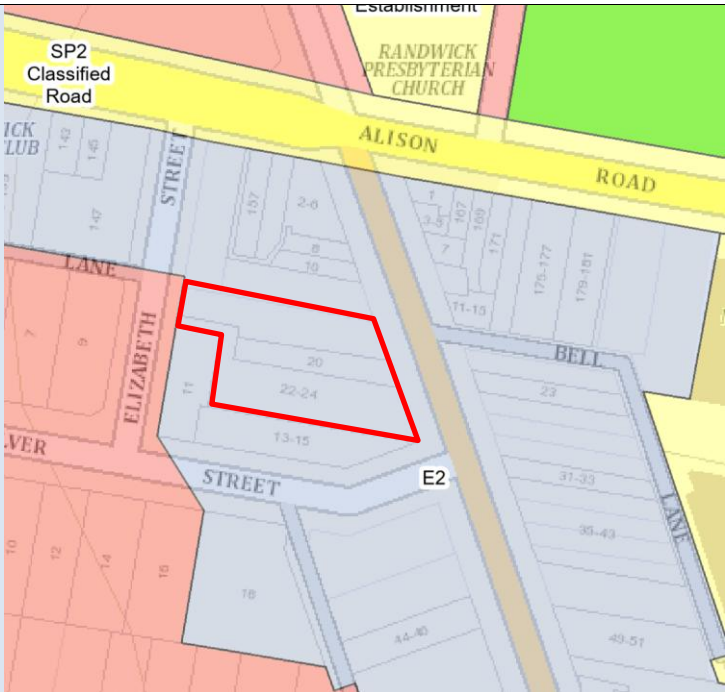
Adjoining development to the north consists of similar scale shop top housing style buildings. The property adjoining to the south consists of a 2-3 storey, commercial building (medical services), and adjoining to the west is a 3-storey residential flat building (11 Silver Street).

The site is in the Randwick Junction Heritage Conservation Area under the Randwick LEP 2012, with the buildings on 16-18 and 20 Belmore Road being contributory to this area. Surrounding development includes residential to the west, and mixed



	commercial buildings and shopping centres along Belmore Road. The site is also well serviced in terms of access to the Sydney Light Rail Line, and frequent bus services along Belmore and Alison Roads as well as the major employment and education services of the nearby Prince of Wales Hospital and University of NSW.
Project Description	The proposal involves the demolition of existing buildings on the site and site preparation and enabling works, including utility services, earthworks, and access provisions. A new shop-top housing development is proposed, comprising 104 dwellings. Of these, 15% of the residential floorspace will be allocated to affordable housing for a period of 15 years, which equates to approximately 16 dwellings. Design feasibility studies by Candalepas Associates confirm that the site can accommodate a total floor space ratio (FSR) of approximately 6:1 and a maximum building height of approximately 51-54 metres. The proposal also involves a concurrent rezoning to amend the Randwick LEP 2012 to increase both the maximum height limit and FSR controls to accommodate the proposed development on the site. Specifically, the maximum height will be increased to 51-54m and the FSR will be increased to 6:1. Design testing has been undertaken by Candalepas Associates, which confirms that the site can accommodate this level of density in a manner that responds to the site's surrounding context.
Land Use Zone	The site is zoned E2 Commercial Centre under the Randwick LEP 2012.



	 Figure 2 – Land Zoning Map (Source: NSW Planning Portal Spatial Viewer)
Permissibility	Shop Top Housing is permissible in the E2 Commercial Centre zone in RLEP 2012. <u>E2 Commercial Centre</u> The following uses are permitted with consent in the E2 Commercial Centre zone: <i>Amusement centres; Artisan food and drink industries; Backpackers’ accommodation; Boarding houses; Centre-based child care facilities; Commercial premises; Community facilities; Creative industries; Dwelling houses; Entertainment facilities; Function centres; Group homes; High technology industries; Home industries; Hostels; Hotel or motel accommodation; Information and education facilities; Local distribution premises; Medical centres; Mortuaries; Oyster aquaculture; Passenger transport facilities; Places of public worship; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Registered clubs; Residential flat buildings; Respite day care centres; Restricted premises; Shop top housing; Tank-based aquaculture; Vehicle repair stations; Veterinary hospitals; Any other development not specified in</i>



	<i>item 2 or 4</i>
SSD Qualification	The Housing Delivery Authority (HDA) recommended to the Minister that the project be declared SSD on 15 July 2025 under s4.36(3) of the Environmental Planning and Assessment Act 1979 (EP&A). Item 46 of the 15 July 2025 issue identified that the development proposal is of state significance as it satisfies the HDA SSD criteria.
Pre-conditions to exercise the power to grant consent	• <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> • <i>State Environmental Planning Policy (Housing) 2021</i> • <i>State Environmental Planning Policy (Industry and Employment) 2021</i> • <i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> • <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i> • <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>
Mandatory Matters for Consideration	• <i>Environmental Planning & Assessment Act 1979</i> • <i>Environmental Planning & Assessment Regulations 2021</i> • <i>State Environmental Planning Policy (Planning Systems) 2021</i> • <i>State Environmental Planning Policy (Housing) 2021</i> • <i>Randwick Local Environmental Plan 2012</i> • <i>State Environmental Planning Policy (Sustainable Buildings) 2022</i>



Other Approvals	Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The following table lists legislative approvals that are required for the Project and cannot be refused if the Project is approved. <table> <tr> <th>Act</th><th>Approval Required</th></tr> <tr> <td colspan="2">Legislation that must be applied consistently</td></tr> <tr> <td>Fisheries Management Act 1994</td><td>No</td></tr> <tr> <td>Mine Subsidence Compensation Act 1961</td><td>No</td></tr> <tr> <td>Mining Act 1992</td><td>No</td></tr> <tr> <td>Petroleum (Onshore) Act 1991</td><td>No</td></tr> <tr> <td>Protection of the Environment Operations Act 1997</td><td>No</td></tr> <tr> <td>Roads Act 1993</td><td>No</td></tr> <tr> <td>Pipelines Act 1967</td><td>No</td></tr> </table>	Act	Approval Required	Legislation that must be applied consistently		Fisheries Management Act 1994	No	Mine Subsidence Compensation Act 1961	No	Mining Act 1992	No	Petroleum (Onshore) Act 1991	No	Protection of the Environment Operations Act 1997	No	Roads Act 1993	No	Pipelines Act 1967	No
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EPBC Act / Biodiversity	The site has no existing vegetation and is located within a highly developed context. As such, a BDAR Waiver will be pursued for																		



Conservation Act	the project and will be submitted alongside the EIS.
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