

9 December 2025

Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure

Ayse Lavorato
Development Assessment Planner
As delegate for the Minister for Planning and Public Spaces

Lodged on the Planning Portal

Dear Ms Fishburn and Ms Lavorato

Re: Objection to State significant development application SSD-81426710 at 138 Maroubra Road, Maroubra

1 Introduction

- 1.1 We refer to the notice of exhibition dated 20 November 2025 concerning SSD-81426710 at 138 Maroubra Road, Maroubra (**Proposed Development**).
- 1.2 The NSW Police Force (**NSWPF**) operates Maroubra Police Station on Lot 1 in Deposited Plan 504393, located at 136 Maroubra Road, Maroubra (**NSWPF Land**). The NSWPF Land adjoins the Proposed Development, being Lots 1 and 2 in Deposited Plan 506844.
- 1.3 The NSWPF has a number of concerns relating to the compatibility between the Proposed Development and the present and future use of the NSWPF Land.
- 1.4 The letter sets out the NSWPF's **objection** to the Proposed Development.

2 Maroubra Police Station

- 2.1 Maroubra Police Station is a site of vital importance to maintaining community safety in Maroubra and the wider Randwick Local Government Area. The Maroubra Police Station operates as the base of the Eastern Beaches Police Area Command (**PAC**), covering 20 suburbs from La Perouse to the South, Banksmeadow to the West, and Clovelly to the North.
- 2.2 Eastern Beaches PAC has two police stations, being Maroubra Police Station and a smaller facility at Randwick. Eastern Beaches PAC provides a 24-hour policing response to a population of over 150,000 residents, businesses and the wider community. Critical infrastructure within the Eastern Beaches PAC includes Port Botany, Botany Industrial Park, Long Bay Correctional Complex, the University of New South Wales and Randwick Hospital Campus, comprising of Prince of Wales Hospital, Prince of Wales Private Hospital, Sydney Children's Hospital, Royal Hospital for Women and Eastern Suburbs Mental Health Services.
- 2.3 Most of the staff in the Eastern Beaches PAC work from Maroubra Police Station. This includes staff carrying out general duties (first response), criminal investigation, crime prevention unit, domestic violence unit, child protection unit, intelligence unit, exhibits, administrative staff and the senior leadership team.

INFRASTRUCTURE AND ASSETS COMMAND

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- 2.4 Maroubra Police Station also has custody facilities and is the only designated charging station within Eastern Beaches PAC. This means it is a critically important station for the operation of the Eastern Beaches PAC.
- 2.5 Other operational police units also regularly attend Maroubra Police Station in carrying out their operations and activities.

3 **Bulk and Scale**

- 3.1 While the NSWPF acknowledges that the Proposed Development is compliant from a building height perspective (in light of section 18 of Chapter 3 of the Housing SEPP), the bulk and scale of the Proposed Development together with its location adjacent to the boundary of the NSWPF Land is unacceptable to the NSWPF.
- 3.2 While some impacts are ameliorated by measures in the Proposed Development, the NSWPF considers that additional measures should be put in place to ensure the safety and privacy of police operations on the NSWPF Land. These are set out in this objection.
- 3.3 In addition, as with a previous proposal, NSWPF expects the developer to enter into negotiations with the NSWPF to ensure additional measures can be agreed so as to ensure the continued safety and privacy of the Maroubra Police Station.

4 **Parking and access to Maroubra Police Station**

Parking

- 4.1 There are six designated curb side NSWPF vehicle parking spaces along Maroubra Road, which are used by NSWPF vehicles when responding the emergency incidents. It is critical for those six NSWPF vehicle parking spaces to be retained. NSWPF operational responses would be impacted if those spaces were to be altered in any way during the construction and operation of the Proposed Development.
- 4.2 Maroubra Property Development Pty Ltd previously engaged with the NSWPF during the assessment of its previous development application (DA80/2023) about the NSWPF vehicle parking along Maroubra Road.
- 4.3 Section 8.13 of the Environmental Impact Statement (**EIS**) refers to the temporary relocation of six on-street NSWPF parking spaces to a 55-degree rear to curb configuration to facilitate the establishment of a construction zone to the front of the Proposed Development along Maroubra Road.
- 4.4 The NSWPF considers that the proposed temporary re-configuration of the six NSWPF vehicle parking along Maroubra Road to be an acceptable outcome. The NSWPF also agrees with the proposal in the EIS that the six NSWPF vehicle parking spaces along Maroubra Road should revert to its current configuration following the construction of the Proposed Development (should it be approved).
- 4.5 The NSWPF considers that any changes to its parking on Maroubra Road (including the requirement to revert the parking to its current configuration) should form part of any conditions of consent.

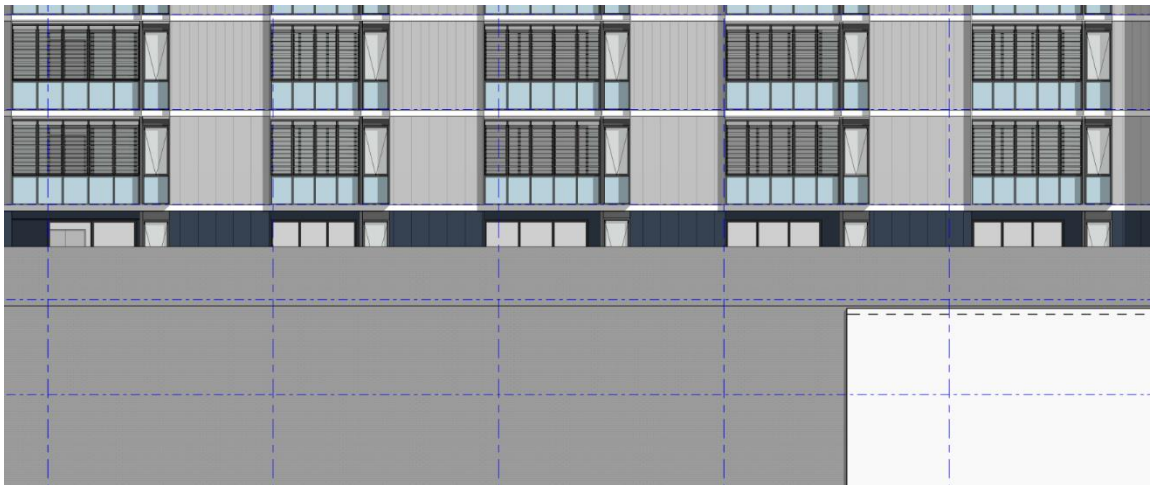
Access to Maroubra Police Station

- 4.6 Construction of the Proposed Development, including the temporary re-configuration of the six NSWPF vehicle parking along Maroubra Road, will result in changes to pedestrian movements into and out of the Maroubra Police Station. While section 4.11 of the EIS Appendix H provides that pedestrian movements will be managed and controlled by site personnel, the nature of the controls is unclear.
- 4.7 The NSWPF requests that, if the Proposed Development is approved, appropriate conditions be considered to ensure the development does not impede access to the Maroubra Police Station and that pedestrians are not directed into the Maroubra Police Station.

5 Privacy and Security

Apartments adjacent to NSWPF Land

- 5.1 The Proposed Development comprises a 9-storey residential flat building with ground floor retail. There are 35 apartments on the western side of the Proposed Development that face the Maroubra Police Station.
- 5.2 There are five apartments on the western side of the Proposed Development on level 2 that have terraces which directly adjoin and overlook the NSWPF Land. The terrace wall is proposed to be 1.4m high as shown below.



- 5.3 It would appear that the individuals of the five apartments on level 2 can move out onto their terrace and view over the wall directly into NSWPF Land. This is unacceptable to the NSWPF as it poses a significant safety and security risk. The NSWPF considers that the 1.4m wall adjoining the NSWPF Land should be increased to improve the safety and security of NSWPF operations. The NSWPF also requires that the same visual treatments be installed on the western wall of the terrace (such as a fixed lattice or louvered treatment) of the terrace areas on level 2 to ensure that the safety and security of NSWPF operations is not compromised.
- 5.4 Above level two, there are 30 apartments on the western side of the Proposed Development that have balconies which overlook the NSWPF Land. The Proposed Development includes some

window treatment (such as louvers and translucent (visually obscured) glass) to mitigate some of the privacy and security concerns of the NSWPF.

5.5 Notwithstanding the above, individuals can still see into the NSWPF Land including:

- (1) an open-air carpark which is located between the external police building and the wall adjacent to the Proposed Development; and
- (2) the office space on the upper level of the Maroubra Police Station.

5.6 The NSWPF considers that individuals may have the opportunity to undertake surveillance of police operations and for objects to fall or be thrown into the NSWPF Land. NSWPF will require the developer to undertake additional measures to ensure the safety and privacy of police operations on the NSWPF Land. The NSWPF has previously negotiated additional measures with the developer and will require it to again agree to additional measures to ensure its concerns are addressed.

Rooftop

5.7 The Proposed Development includes a rooftop terrace with safety screens proposed along the northern and western boundary (Table A EIS Appendix C). The NSWPF considers the inclusion of the safety screens as essential to ensure the safety and privacy of police operations on the NSWPF Land. The NSWPF seeks additional information about the finish and treatment of the safety screens.

6 Boundary set back and building management plan

Boundary set back

6.1 The western side of the Proposed Development includes a proposed set back of 3m from level 2 and above. There is no setback on the western side of the Proposed Development below level 2. The NSWPF considers that additional building set backs should be required on the western side of the Proposed Development to ensure it is compliant with the National Construction Code.

Building management plan

6.2 Given the proximity of the Proposed Development to the Maroubra Police Station, the developer should be required to develop a building management plan in consultation with the NSWPF for the management of the development once constructed (if approved).

6.3 The NSWPF considers that a requirement for the developer to develop a building management plan in consultation with the NSWPF plan should form part of any conditions of consent, if the Proposed Development were to be approved.

7 Future Needs of the NSWPF

7.1 As stated above, the Maroubra Police Station is a vitally important station for the NSWPF. It is a major centre of operations and contains features that are critical to the safety and security of the New South Wales public including the provision of holding cells. The station is close to full capacity.

7.2 NSWPF has operational requirements that will mean the station needs to expand in the near future. The timing of the expansion is yet to be determined, but it is likely to involve a substantial increase in floor space together with additional operational features.

- 7.3 The existence of a residential flat building directly on the boundary of NSWPF Land is not ideal, and risks prejudicing the future safety and security of the NSWPF and the public because it is likely to impact the operations of the NSWPF.

8 Conclusion

- 8.1 For the reasons stated above, the NSWPF considers that the Proposed Development is not appropriate because it poses an unacceptable risk to the day-to-day operations of Maroubra Police Station and may impede the future expansion of Maroubra Police Station.
- 8.2 However, the NSWPF considers that its concerns can be addressed by the developer agreeing to additional measures in a deed of agreement with the NSWPF. Should the developer be able to address the concerns stated above and enter an appropriate deed of agreement with the NSWPF, the NSWPF intends to withdraw its **objection** to the Proposed Development.
- 8.3 Should you wish to discuss further, please do not hesitate to contact Julie Ross by email at ross2jul@police.nsw.gov.au.

Yours faithfully



Julie Ross
Manager, Property Portfolio
Infrastructure & Assets Command
NSW Police Force