

# Response to Request for Further Information

Planning Proposal PP-2023-2881

193 - 199 Rocky Point Road, 66-68 Ramsgate Road, 2-4 Targo Road,  
Ramsgate

Submitted to Georges River Council  
on behalf of Fabcot Pty Ltd



**'Gura Bulga'**

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



**'Dagura Buumarri'**

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



**'Gadalung Djarri'**

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past, present and emerging.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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Appendix	Author
A. Revised Architectural Reference Scheme and Assessment Drawings	Clarke Hopkins Clarke (CHC)
B. Revised Architectural Report	Clarke Hopkins Clarke (CHC)
C. Revised Draft Site-Specific DCP	Ethos Urban
D. Traffic and Parking Advice	CBRK
E. Heritage Impact Advice	NBRS
F. Wind Impact Advice	MEL Consultants
G. Concept Supermarket Plan	Clarke Hopkins Clarke (CHC)

# 1.0 Introduction

## 1.1 Overview

We refer to the above proponent-initiated planning proposal by Fabcot Pty Ltd (the Proponent) which was submitted to Georges River Council (Council) in December 2023.

A preliminary assessment of the planning proposal has been undertaken by Gyde Consulting in the form of an RFI letter to the Applicant dated 5 April 2024. Additionally, internal referrals were received from the following Council departments:

- Heritage
- Stormwater
- Traffic
- Trees and Landscape
- Waste Management
- Urban Design

Furthermore, a Transport for NSW (TfNSW) referral was received on 15 April 2024, the comments of which are addressed in **Section 4.0**.

This letter has been prepared in response to the feedback received to date to allow for the continued assessment of PP2024/0001. The matters raised by Council/Gyde Consulting are provided below with the Applicant's responses interposed as appropriate.

This response should be read in conjunction with the following supporting appendices:

**Appendix A** Revised Architectural Reference Scheme

**Appendix B** Revised Architectural Report

**Appendix C** Revised Draft Site-Specific DCP

**Appendix D** Traffic and Parking Advice

**Appendix E** Heritage Impact Advice

**Appendix F** Wind Impact Advice

**Appendix G** Concept Supermarket Plan

## 1.2 Key amendments to the proposed design

The comments received from the Gyde preliminary assessment and the Council internal referrals have been acknowledged and taken on board. This feedback has prompted a series of changes in the design of the reference scheme to provide the best possible development and future use of the site. These key changes are discussed below.

### 1.2.1 Removal of through-site link

Based on Gyde's feedback on the merit and safety of the through-site link, the indicative reference scheme has been amended to remove the through-site link along the western boundary and replace it with a deep soil landscaped setback that will help with facilitating a vegetated interface with the residential properties to the west. Removal of the through-site link is also a result of the fact that it has limited value, as identified by Gyde Consulting, given the site's proximity to Rocky Point Road, meaning that a pedestrian path would only benefit a select number of local residents in the locality. The width and design of the link, with the kink in the middle, is also likely to be a deterrent for residents to use the link due to safety concerns. Removal of the through-site link and replacing it with deep soil planting increases the total provision of deep soil from 7.26% to 9.06% of the site area.

### 1.2.2 Public domain activation

In response to Gyde's recommendation to remove the through-site link and explore other opportunities to improve public amenity and activation, the indicative reference scheme has been revised to provide a 1m

setback of the Ground floor façade from the Rocky Point Road boundary to allow for a wider footpath to enhance pedestrian movement.

The revised indicative reference scheme has introduced 3 activity nodes to further improve public amenity. The first node is located at the corner of Targo Road and Rocky Point Road and has been created as a result of relocating the fire stairs behind the lifts away from the corner, which has allowed a deeper setback along Targo Road. The provision of a deeper setback along Targo Road creates opportunities for seating, planting and an informal gathering space for the local community, whilst enhancing pedestrian movement and connectivity around the site. The second node is a public seating area/ gathering space located north of the deep soil planting zone on Targo Road. This node was previously the entrance to the through-site link that connected pedestrians from Targo Road to Ramsgate Road, however with the through-site link now removed, this space has been designed to provide a respite and informal gathering space for local residents that is equipped with seating, pergola structure integrated with planting and drinking fountain with pet bowl facilities. The third node is located south of the deep soil planting zone on Ramsgate Road and the intention of this space is to provide additional planting along Ramsgate Road where it was previously proposed as paving. The third node will also provide additional seating for residents and members of the local community to use as a waiting area for the nearby bus stop in front of the heritage building 'Roma apartments' which is currently only serviced by a park bench.

### **1.2.3 Reduction of potential vehicle and pedestrian conflict**

We recognise Gyde's concerns regarding potential vehicle and pedestrian conflict on Targo Road due to the residential lobby access being in close proximity to the vehicular entry to the basement. To address Gyde's concerns, the indicative reference scheme has been amended to shift the residential lobby entry 5m further east along Targo Road to provide ample separation and minimise potential conflict between residents and vehicles entering and exiting the site. Additionally, the second residential lobby accessed from the western through-site link has now been removed which therefore reduces the pedestrian/vehicle conflict in this part of the site.

### **1.2.4 Sympathetic heritage response**

Council's Urban Design referral raised concerns the proposed Building C and commercial loading will have negative impacts to the adjacent heritage building 'Roma apartments'. In response to Council's concerns the corner of Building C adjacent to the access driveway has been further splayed to allow for greater visual connectivity from the west along Ramsgate Road to the neighbouring heritage building. The proposed materiality of Building C has been amended to better respond to the red brick aesthetic of the 'Roma' apartments. To address acoustic impacts from the commercial loading dock the façade cladding directly facing the heritage item is proposed to use acoustic blades and the loading dock entry door has been changed from a roller door to a batten sliding gate with acoustic backing. This sliding gate is proposed to be closed at all times apart from when vehicles are entering and exiting the loading dock, allowing for noise generated from the loading dock while in use to be contained within the dock itself and not disturb the residence of 'Roma'. As part of a future DA on the site a loading dock management plan will also be submitted.

### **1.2.5 Additional basement parking level**

To address Council's traffic team's concerns of the proposal not complying with the Georges River DCP 2021 (GRDCP 2021) residential and commercial parking requirements, the indicative scheme has been revised to include the addition of third level of basement parking. The introduction of a third level of basement parking accommodates the additional parking spaces required for both the residential and retail components of the proposal, and to ensure compliance with the GRDCP 2021. The additional level of basement parking has also allowed for a reduction in tandem parking spaces (previously 26, down to 19) and accommodated the suggested parking rate from Council for 1 and 2 bedroom units to have a least 1 assigned off-street parking space each, to help alleviate the impact on street parking. As a result, the reference scheme now provides for a total of 200 retail parking spaces and 245 residential parking spaces.

As a result of the inclusion of a third level of basement parking, minor amendments have been made to the design and layout of basement levels 01 and 02 that include:

- Reconfiguration of Basement 02 to serve both retail and residential requirements of the proposal.
- Residential goods lift services Basement 02 that connects the level to the loading dock/delivery and waste storeroom at Ground Level, along with the Level 1 podium and communal space.
- Waste room and bulky goods store room for Buildings A and B added to Basement 03 in order to address the comments made in Council's waste management referral.

- Waste room and bulky goods store room for Building C added to Basement 02 in order to address the comments made in Council's waste management referral.
- Lobby and dual lift access to the retail space on the retail parking side.
- Secure roller door added to the entry to the residential parking allocation which allows for the secure separation of residential and retail cars.
- Lobby and dual lift access to the retail space allowing for better visual connection to the remainder Basement 01.
- Trolley store added to the underside of the traveller at Basement 01.

### **1.2.6 Increased building separation between Building B and No. 6 Targo**

The western façade of Building B has shifted further east to increase the distance from western boundary. While the previous indicative reference scheme satisfied ADG requirements in terms of building separation from No.6 Targo Road. To address Council's concerns regarding visual privacy, at Level 1 the façade line has shifted from 8m to 11m from the boundary and from 9m to 11m at levels 2-4. As a result of the increased building separation the number of proposed apartments has decreased to 141 from 144, however it has improved access to natural light for the proposed apartments and communal open space and reduced impacts on neighbouring properties.

### **1.2.7 Optimised waste storage**

To address Council's concerns regarding waste management, minor amendments have been made to the proposed waste storage areas to provide an optimised outcome, these include:

- Inclusion of waste room and bulky goods store room for Building A and B at Basement 03., as per recommendations by Council
- Inclusion of waste room and bulky goods store room for Buildings C at Basement 02, as per recommendations by Council
- Adjustment to the size of the waste room contained within the loading dock area to accommodate recommendations provided by Council.



## 2.0 Preliminary Review by Gyde Consulting

### 2.1 Strategic Merit – Preliminary Assessment

#### 2.1.1 Removal of publicly accessible open space

*It is noted that this iteration of the PP no longer provides the provision of publicly accessible open space plaza at ground level, which reduces opportunities for social interaction and is a less-desirable outcome.*

We acknowledge the two previous planning proposals on the site included the provision of publicly accessible open space. The strategy has changed for this, however in this proposal, which has occurred in direct response to previous feedback from the Regional Planning Panel and Council. The provision of the publicly accessible open space was also resulting in the development being more costly to deliver, a byproduct of this was the need to achieve greater height and density to cover the costs of such a significant public benefit.

In response to the previous Planning Proposal, the Regional Planning Panel raised concerns about the proposed height, bulk and scale of the proposal, and also questioned the specialty retail at ground level as they felt that it would have the potential to elevate the Ramsgate centre and create additional competition for surrounding centres that are of a higher order.

This planning proposal has therefore been amended in direct response to this feedback by removing the ground level public plaza and reducing the extent of retail. Relocation of the supermarket to the ground level has also enabled a different approach to the buildings above.

#### 2.1.2 Repeal of SEPP 65

*It is noted that the Planning Proposal Justification Report submitted with the PP application in December 2023 refers to State Environmental Planning Policy (Housing) 2021 (Housing SEPP) as not being applicable to the proposed LEP amendment, and states that the PP is consistent with State Environmental Planning Policy No 65—Design Quality of Residential Apartment Development (SEPP 65). SEPP 65 was repealed on 14 December 2023 and inserted into the Housing SEPP under a new Chapter 4 titled 'Design of residential apartment development'. As such, our review of the PP's consistency with the applicable SEPPs above clarifies the PP's consistency with the Housing SEPP and does not include SEPP 65.*

The Applicant acknowledges that the planning proposal is now subject to an assessment of the relevant provisions of the Housing SEPP rather than SEPP 65, which has been repealed. Notwithstanding this, the assessment of the proposed reference scheme against the Apartment Design Guide (ADG) and the design principles relating to residential flat buildings remains the same, despite its enforcement pursuant to the Housing SEPP rather than SEPP 65. The Planning Proposal Report will be updated to reference the correct SEPP.

### 2.2 Site Specific Merit – Preliminary Assessment

#### 2.2.1 Exclusion of No 6 Targo Road from the site area

*There is significant concern over the exclusion of No. 6 Targo Road from the PP's site area as raised in the urban design advice. No.6 is a small site with 480sqm site area and has a 9m frontage. This small and narrow lot was included in the previous planning proposals. Future development potential of No 6. will be limited despite its current R4 zoning due to the following reasons:*

*the existing multi dwelling housing development adjoining the site to the west which is unlikely to redevelop in the near future; the site (in isolation) does not comply within the minimum 1,000sqm site area for RFBs under the DCP, or the minimum site area of 800sqm for medium density developments under the LEP; in combination with the proposed development adjoining the site to the east.*

*Inclusion of No 6 Targo Road will provide additional site area and frontage along Targo Road to potentially relocate the loading access driveway to the northern boundary; therefore, removing the traffic and heritage issues anticipated due to its current proposed location from Ramsgate Road.*

*The urban design advice recommends shifting the basement entry to the west, away from the pedestrian entry for Building B and into No. 6 Targo Road, to minimise pedestrian and vehicular conflict and safety issues, and to allow for a linear through-site link.*

*How loading and services can be designed to be collocated with the basement vehicular entry from Targo Road should be investigated in terms of if there will be sufficient space to locate all vehicular access from Targo Road, including a separate onsite residential loading bay as required in the Traffic advice, and how pedestrian safety, amenity to neighbouring properties (particularly for No 8 Targo Road), and traffic network impacts would be managed.*

Despite No. 6 Targo Road being included in the site of previous planning proposals; the landowner no longer wishes to be part of the proposed development. Whilst landowner's consent is not required for a site to be included in a planning proposal, a planning proposal is based on a reference scheme with an intended future built form to justify the proposed amendments to the development standards. In this regard, landowner's consent is required for a development application to be lodged.

The Proponent has made best endeavours to acquire No. 6 Targo Road to no avail, as follows:

- The Proponent has attempted to acquire 6 Targo Road, and has previously agreed to a purchase price with the vendor, on numerous occasions over the course of approximately 6 months.
- Despite attempts to exchange contracts, including issuing a signed contract and deposit to the vendor's solicitor, this exchange was not possible.
- On multiple occasions, the vendor changed their mind and ultimately decided not to proceed.
- Due to the vendor's circumstances, the Proponent attempted to use the vendor's solicitor to assist with communication with the vendor.
- Given the vendor had decided not to sell, the Proponent formally requested the vendor's consent to be part of the Planning Proposal. However, the vendor did not provide their consent.
- Due to the vendor's change in personal circumstances, the Proponent elected not to include 6 Targo Road in the planning proposal subject site without landowner's consent.

To include No. 6 Targo Road in the site would introduce a risk that the proposed scheme would not be developed in the future.

Furthermore, No. 6 Targo Road is not at risk of experiencing site isolation in its true definition, as it is not a corner site and is capable of future development through amalgamation with adjoining sites. Both No. 6 and No. 8 Targo Road are zoned R4 High Density Residential and there is potential for these sites to be developed together in the future. To alleviate concerns relating to site isolation, architectural modelling has been prepared to demonstrate a potential future development scheme for No. 6 and No. 8 Targo Road which would be able to coexist with the proposed development scheme on the subject site to the east (see **Appendix A**, Sheets CP26-CP27). At plan view from a zoning and lot configuration perspective, redeveloping No.6 and No.8 Targo Road together presents a more rational and logical approach to redevelopment, as the development sizes and shapes are regularised.

## **2.2.2 Location of the Commercial Loading Dock and Access Driveway**

*The proposed 6m wide "Loading Access Driveway" located along the east of Building C from Ramsgate Road for heavy rigid vehicle (HRV) access is not supported by Council's Traffic Officers. There is concern over locating the loading dock driveway off Ramsgate Road (higher order road) due to potential safety concerns and rear end crashes. It is noted that the driveway requires a minimum width of 6.5m. The traffic advice is for all vehicular access including commercial loading dock to be provided off Targo Road (from lower order road), if possible.*

*The heritage advice also recommends relocating the proposed loading access driveway away from the east of Building C, which is adjacent to the "Roma" residential flat building (RFB) and heritage item located at No 70 Ramsgate Road, due to the potential visual and noise impacts to the residents of the Heritage item.*

*This advice is inconsistent with the urban design/strategic planning advice, which requires the driveway to be retained as proposed to provide future vehicular shared access to the rear of No 201-209 Rocky Point Road. The advice states that the concept scheme include an easement over the proposed 6m wide driveway to allow shared vehicular access to accommodate MRVs required for back of house functions or Council's garbage collection vehicles for the future development of 201-209 Rocky Point Road. The advice also requests shared access for No 201-209 Rocky Point Road through its basement for any future development.*

*It is noted that there is an existing 3.66m ROW at the rear of 201-209 Rocky Point Road which would only require an additional 1.34m to achieve the 5m laneway width required.*



*Part 7 Business Precincts of the DCP includes controls which relate to Ramsgate Centre Local Centre and require new lanes to be introduced where appropriate and potential for a 5m laneway to be provided between Targo Road and Ramsgate Road for properties fronting Rocky Point Road and vehicle access for any redevelopment of a site fronting Rocky Point Road to be consolidated.*

We acknowledge Gyde and Council's internal referral comments regarding the location of the commercial loading dock and access driveway, noting there is an inconsistency in advice and positions from different internal referral specialists within Council. As such, the location of the loading dock and access driveway is proposed to remain at Ramsgate Road, as this has always been the preferred location and has not been raised as a concern in previous planning proposals on the site.

The primary reasons for this being the preferred location are:

- It enables access to be provided to the site but also maintains the current arrangement for service access to the businesses fronting Rocky Point Road, specifically 201-209 Rocky Point Road. If the commercial loading dock was relocated to Targo Road, as per Gyde's and Council's Traffic and Heritage teams' recommendation, there would be insufficient width provided to facilitate vehicle access to the properties along Rocky Point Road.
- The proposed access arrangement provides an outcome that is consistent with the existing Right of Way.
- It will ensure a better safety outcome in that vehicles and trucks will be able to enter/exit in a forward direction.
- It achieves an outcome that will not impact existing properties along Rocky Point Road and will not disturb residents on Targo Road, which would occur under a scenario where loading vehicles are using Targo Road as the point of access and servicing.

To address Council's Heritage team concern with regard to potential noise impacts to residents of the heritage item, a loading dock management plan will be prepared and submitted as part of any future development application, which will require the closure of the loading dock service door once vehicles have entered the loading area. Additionally, Woolworths is a large operator and have the ability to schedule deliveries during times that would have the least amount of disruption to residents.

Targo Road has never been the preferred location for the commercial loading, feedback relating to previous planning proposals applying to the site indicated that it would be an undesirable scenario for large service trucks to access the site from Targo Road, given it is a lower order residential street and would have a significant amenity impact.

A concept supermarket plan has been prepared (see **Appendix G**) that demonstrates the functionality of the supermarket within the context of the site. The front of house of the store addressing both Rocky Point Road and partially to Targo Road allows for direct connection and activation to the street and internally, linear aisles and direct connection to relevant behind counter prep areas. The introduction of a Targo Road accessed loading dock would severely disrupt the functionality of the supermarket, and it would result in the development of the supermarket being unfeasible and economically prohibitive, and therefore the redevelopment of the site would not be realised.

In any case, relocating the loading dock to Targo Road will not remove the operation of the rear lane as a loading dock in accordance with the Right of Way registered on the title (see **Appendix A**, Sheets CP01, CP25). By reinforcing this accessway from Ramsgate Road, the commercial premises at 201-209 Rocky Point Road will benefit from the redevelopment of the subject site where the opportunity for this rear loading dock and accessway location would otherwise fail to be realised. In this regard, the subject planning proposal creates a future opportunity for the sites at 201-209 Rocky Point Road to be redeveloped where that opportunity would otherwise not exist.

### 2.2.3 Justification, safety and public benefit of the through-site link

*As recommended in the urban design advice, the through-site link should be re-located and redesigned as a linear path with clear sight lines from Ramsgate Road to Targo Road. This may include a partial arcade towards Targo Road end.*

*The existing through-site link has considerable amenity and safety issues due to the lack of adequate passive surveillance, its non-linear path resulting in obstructed sight lines, and the solid walls to the east and a solid metal fence to the west which create an enclosed space. The long corridor and dog leg in the laneway will be at risk of vandalism and antisocial behaviour.*

*Whilst the proposed relocation and redesign of the through-site link would address the safety issues raised, the public benefit of a pedestrian through-site link and its conflict with deep soil is questioned for the following reasons:*

- the through site pedestrian link does not provide any space for social interaction, noting that most of the width must be deep soil, nor will it provide access to retail, as retail frontage is only provided from Rocky Point Road. It therefore misses an opportunity to provide an activated 'laneway' or arcade experience with a pedestrian refuge, shopping, and alfresco seating away from the noise of Rocky Point Road, as intended in the DCP.*
- The VPA proposes Works in Kind relating to the through-site link to be formalised as publicly accessible via a public access easement on title for public benefit. However, there is little public benefit provided by way of the through-site link that runs in a north to south direction along the western boundary or more centrally through the site that does not provide an activated 'laneway' or arcade experience.*
- At its basic function, it acts as a secondary pedestrian pathway that connects Ramsgate Road to Targo Road, avoiding the vehicular dominated experience of Rocky Point Road. However, its usability as a pedestrian and bicycle pathway is questioned as it is less than 70 metres, or approximately a 1 minute walk, from Rocky Point Road and the provision of deep soil significantly reduces the pathway width required for efficient pedestrian and cycling traffic flow.*
- The through-site link does not connect to any existing bicycle paths and there are significant potential safety issues for cyclists emerging from the link to Ramsgate Road.*
- With the retail frontage to remain along Rocky Point Road, there is a more legitimate opportunity to provide public benefit by enhancing the existing public domain along the main street frontages. The proposal will result in increased pedestrian traffic on the existing narrow (approx. 2.5m wide) footpath along Rocky Point Road, particularly at the entry point of the supermarket, which will result in poor pedestrian movement and potential safety issues.*

*It is therefore recommended that a recessed ground floor entry to the supermarket at the corner of Rocky Point Road and Targo Road is considered to increase the provision of public domain at the main pedestrian street entry of the supermarket. This will provide greater space for pedestrian movement, places to dwell and refuge, including seating/benches, and opportunities for landscaping in the form of planters at ground level that cannot be achieved within the existing footpath widths along Rocky Point Road.*

*Relocation or deletion of the through-site link may require updates to the site Specific DCP and VPA.*

The through-site link was included in the proposal in response to Council's request relating to the previous planning proposal. However, based on Gyde's feedback on the merit and safety of the through-site link, the reference scheme is proposed to be updated to remove the through-site link along the western boundary and replace it with a deep soil landscaped setback that will help with facilitating a vegetated interface with the residential properties to the west. Removal of the through-site link is also a result of the fact that it has limited value, as identified by Gyde Consulting, given the site's proximity to Rocky Point Road, meaning that a pedestrian path would only benefit a select number of local residents in the locality. The width and design of the link, with the kink in the middle, is also likely to be a deterrent for residents to use the link due to safety concerns.

In response to the suggestion that the link should be relocated to be more central within the site, any centrally located link would significantly compromise the supermarket floorplate to the point that the scheme would not be possible. Accordingly, there is no viable alternative for a through-site link to be located elsewhere on the site.

As a result of the above, the revised reference scheme prepared by CHC (see **Appendix A**, Sheets CP02, CP12) removes the through-site link and instead provides the following:

- Increased footpath width (approximately 3.5m) along Rocky Point Road, by setting back the Woolworths façade by 1m.
- A new public seating area and additional planting at the corner of Rocky Point Road and Targo Road by recessing the ground floor entry.
- A public seating area/ gathering space to the north of the deep soil planting zone on Targo Road. This area allows for a small inlet into the designed to be given back to the public and is intended to be a local residential space with some seating to be provided along with a pergola structure to integrate with the surrounding planting, and a drinking fountain with pet bowl facilities.

- Landscaped area located south of the deep soil planting zone on Ramsgate Road, to replace the previously proposed hard paving. Additional seating will be provided in this node and will provide local residents a waiting area for the nearby bus stop in front of the 'Roma' apartment, which is currently only serviced by a park bench.
- Landscaped setback at the site's interface with residential dwellings to the west, improving the deep soil provision on the site.

The removal of the through-site link from the proposed development is also reflected in an amended site-specific DCP (see **Appendix C**).

## 2.2.4 Traffic impacts and Road Network Upgrades

*Should the loading bay/access driveway be relocated to Targo Road, further traffic analysis will be required which may result in additional traffic network improvements.*

*The relocation of all vehicular access to the site, including the consolidation of vehicle access for the subject site and 201-209 Rocky Point Road will require coordination between Council's Traffic Engineer and the applicant's architect and traffic consultant.*

*It is recommended the proposed relocation of vehicular access to the site and traffic network improvements are discussed between Council's Traffic Engineer, the applicant and TfNSW, as required.*

*Despite these matters raised above, these issues are considered manageable based on further discussion with Council's Traffic, Heritage, and Urban Design teams and the applicant. Once agreed, our opinion is that site-specific merit can be determined with appropriate site-specific DCP controls or otherwise overcome with a future DA. As such, some documentation submitted with the PP application will require updates. These are listed below.*

The location of the access driveway is proposed to remain in its current proposed location due to the reasons outlined in **Section 2.2.2** above. As such, there is no need for additional traffic analysis to be carried out to assess this scenario.

Notwithstanding the above, consultation with TfNSW has taken place and is ongoing. Further traffic analysis will also be carried out for any future DA applying to the site.

## 2.3 Additional Comments for Consideration

### 2.3.1 Inclusion of 201-209 Rocky Point Road in the PP

*Upon our review of the sites included the PP, we have reviewed in detail the adjoining sites which have been excluded. This includes No 6 Targo Road, which we have addressed above, and also No 201-209 Rocky Point Road. For No 201-209 Rocky Point Road, we question how redevelopment of these remaining local centre zoned sites fronting Rocky Point Road can redevelop and if it is beneficial for these lots to be part of the PP.*

*The combined site area of 201-209 Rocky Point Road is approximately 1,600sqm and should enable mixed use development to be built to the full potential of the existing HOB and FSR controls under the Georges River LEP 2021. Any future development at this site would need to respond to the adjacent heritage items to the immediate south, particularly in relation to overshadowing, visual and noise impacts, which may limit opportunities for the site to take advantage of increased height and FSR. Notwithstanding, exclusion of this site area may impede future development potential for this site in relation to shared vehicular access to accommodate MRVs required for back of house functions or Council's garbage collection vehicles to the site. Rather than addressing these sites in parts, inclusion of No 201-209 Rocky Point Road may provide a more holistic and robust redevelopment outcome for these sites and for the local centre. Council has recommended the concept scheme include an easement over the proposed 6m wide driveway to allow shared vehicular access to 201-209 Rocky Point Road, and also requests shared access for 201-209 Rocky Point Road through its basement for any future development. Should the 6m wide driveway from Ramsgate Road be relocated to Targo Road, it is recommended that further consideration is made to the inclusion of these sites that would resolve/consolidate vehicular access for future development. The applicant should justify why the other properties (No 6 Targo Road and No 201-209 Rocky Point Road) are not included in the PP. We understand that No 6 Targo Road and No 201-209 Rocky Point Road are not owned by the applicant, however this should not preclude the inclusion of these sites in the PP, noting that a PP may include land that is not under the Applicant's ownership.*

The sites comprising 201-209 Rocky Point Road are not intended to form part of the planning proposal's subject site due to a lack of commercial viability. It has not been the subject of previous planning proposals and is not intended for any combined future redevelopment.

Design testing has been undertaken for No. 201-209 Rocky Point Road, demonstrating that they are able to be redeveloped as a collective. The site is of a sufficient size that will enable future development to step down and create an appropriate interface with the adjacent heritage items. A potential development option has been prepared by CHC (see Drawing CP25 in **Appendix A**) to demonstrate that these sites can be redeveloped in the future whilst accommodating the building separation requirements of the ADG.

The existing Right of Way will continue to provide access to these properties, and any future DA will make provision for development at this site to have access provided by the proposed accessway to their own dedicated loading dock, as shown in Drawing CP12 in **Appendix A**.

## 2.4 Document Revisions

*The PP must clarify the 4 key matters raised to support site-specific merit. Below is a list of PP documents that require updates to justify the site-specific merit and to progress the PP. The documents may be updated now to respond to the referral issues noted above, or addressed at Gateway, prior to exhibition.*

Document	Applicant response
<b>Appendix H Traffic Report</b> <ul style="list-style-type: none"> <li>to address redesign and relocation of vehicular access to the site and resolving vehicular access issues for future development at 201-209 Rocky Point Road.</li> </ul>	This is not required as the vehicular access into the site will be retained as per its current design.
<b>Appendix D Site-Specific Development Control Plan / Site Specific DCP – Revised 7 February 2024</b> <i>To address through-site link, vehicular access and provision of parking, and any other relevant matters raised in the referrals. This includes:</i> <ul style="list-style-type: none"> <li>The redesign/relocation or deletion of the through-site link will require the site specific DCP to be updated.</li> <li>The relocation and consolidation of vehicular access will require the site specific DCP to be updated.</li> <li>Additional public domain improvements including minimum ground level setback area at the corner of Rocky Point Road and Targo Road should be included in the updated site specific DCP.</li> <li>Inclusion of No 6 Targo Road in the site area and potential inclusion of No 201-209 Rocky Point Road, particularly in relation to back of house vehicular access.</li> <li>The proposed site-specific DCP includes parking rates for the site. The traffic advice provided states that the proposed parking provision for the residential, supermarket and retail components do not satisfy the DCP requirement of 385 spaces. Parking provision will need to be resolved and updated in the site specific DCP, or otherwise omitted, and therefore should rely solely on the existing applicable DCP and TfNSW parking rates to be addressed in a future DA.</li> </ul>	A revised site-specific DCP is provided in <b>Appendix C</b> .
<b>Planning Proposal Justification Report</b> <i>To address all relevant matters/inconsistencies raised above. The following documents would benefit from being updated to address certain inconsistencies based on the above, but are not critical to progress the PP:</i> <ul style="list-style-type: none"> <li>Appendix B Architectural Plans prepared by Clarke Hopkins Clarke</li> <li>Appendix C Urban Design Report prepared by Clarke Hopkins Clarke</li> <li>Appendix F Concept Landscape and Public Domain Report</li> <li>Appendix I Statement of Heritage Impact</li> <li>Appendix J Public Benefit offer – to remove through-site link from VPA (if required)</li> <li>Appendix M Architectural Report</li> </ul>	These reports will be revised to address the amendments arising from this RFI process in due course.

## 3.0 Council Referrals

### 3.1 Heritage

Edwards Heritage Consultants have been engaged to provide an assessment on behalf of Council. The considerations raised in the heritage referral response are summarised in **Table 1** below with corresponding responses as appropriate.

**Table 1** *Heritage Referral*

Consideration	Response
<i>This Planning Proposal seeks to amend Georges River LEP 2021 by rezoning the land and amending the applicable built form controls to enable the redevelopment of the site for the mixed-use 'Ramsgate Village' development comprising residential and retail uses, as well as public open space.</i>	The proposed reference scheme no longer includes a public open space.
<i>The Planning Proposal is essentially considered the same in quantum to a previous Planning Proposal which was lodged with Council in 2019 and refused by the Regional Planning Panel in 2021 on the grounds that the proposal did not have site-specific merit.</i>	<p>This statement is not correct, and also does not take into account the more recent planning proposal submitted in June 2022. Compared to the previous scheme, the proposal demonstrates the following design improvements:</p> <ul style="list-style-type: none"> <li>• Relocation of the supermarket to street level and reduced intensity to support the existing surrounding retail strip.</li> <li>• Reduced traffic intensity, less basement excavation and improved streetscape outcome.</li> <li>• A smaller development site and reduced building massing. The site area has reduced from 24,772m<sup>2</sup> to 16,985m<sup>2</sup> and the proposed FSR has reduced from 3.66:1 to 2.66:1.</li> <li>• Reduced street wall height and building heights. Building C is reduced from 6 storeys to 4 storeys.</li> <li>• The western boundary setback has increased from 3m to 6m, allowing deep soil provision of 7.2%.</li> <li>• Visible active podium and finer grain edges.</li> <li>• Increased upper level setback.</li> <li>• Improved heritage interface.</li> </ul>
<i>Notwithstanding, this Planning Proposal has been reviewed and it is noted that some revisions have been made to respond to previous issues raised, including the concern with the vertical height and envelope of the building presenting to Ramsgate Road and immediately adjoining the heritage item. The Planning Proposal seeks to set in place conceptual building envelopes and the merits of any specific development proposal will be considered as part of future Development Applications. Still, it is necessary to consider whether the envisaged future development resulting from the conceptual building envelopes and general site arrangements will have a harmonious relationship to the two heritage items on the site and therefore have an acceptable heritage impact.</i>	A comprehensive assessment of heritage impact has been undertaken by NBRS to accompany the planning proposal.
<i>Specifically, this Planning Proposal provides for an increase in the building height controls, which will envisage a larger built form by comparison to both the current building stock as well as an increase from the potential heights envisaged under the present planning controls. In principle and subject to further comments below, the increased building heights and envelopes to 'Building C' are acceptable, noting the larger future building volume is concentrated to 'Building A' and 'Building B' which are located to the north of the two heritage items and therefore, the furthest away from the heritage items.</i>	Noted.
<i>The accompanying Heritage Impact Statement (HIS) provides an assessment of the anticipated impacts of the future development</i>	Noted.



forms envisaged by this Planning Proposal. The HIS is supportive of the proposed increase in building height controls, the overall envelope and zoning of the land.	
It is acknowledged that the primary elevation of the heritage items is oriented to address Rocky Point Road and Ramsgate Road, and the future development would not obscure the primary views to the two heritage items. While the visual context and backdrop of the two heritage items will be altered, the appreciation of the character and relationships between the heritage items would still be appropriately managed and retained.	Noted.
The proposed building envelopes are centred around a public square which will 'pull the (future) buildings apart' and allow for a sense of building separation and solar amenity to the residential occupants of the building known as 'Roma'. The scale (height and envelope) of 'Building C' fronting Rocky Point Road is generally acceptable and will allow sufficient spatial separation between the buildings to not have an unacceptable sense of visual dominance to the heritage item. This is a substantial improvement to the building envelopes as previously presented under the previous Planning Proposal for the site.	This comment is irrelevant as the current proposal does not incorporate a public square into the design.
Under the previous Planning Proposal, a corridor was incorporated along the shared boundary with the heritage item 'Roma', allowing not only spatial separation between the proposed building and the heritage item, but also for a reasonably acceptable outlook and amenity to the heritage item. Under this Planning Proposal, while the corridor will provide for spatial separation between 'Building C' and the heritage item 'Roma', this space is now effectively a utility access driveway that leads to the proposed loading dock. The entire length of 'Building C' at the ground level will comprise a substation, roller door and waste receptacles, which will have a non-active frontage and provide poor amenity and outlook for the occupants of the heritage item, particularly as the private open spaces of 'Roma' are oriented to the rear of the building and there are windows incorporated into the western side elevation of the heritage item providing outlook to the proposed utilitarian access driveway. The anticipated acoustic impacts from this space will likely necessitate the introduction of a solid acoustic wall along the boundary to protect acoustic amenity of the adjoining heritage item. This will further diminish the visual amenity and outlook from the heritage item, having an unacceptable impact. There is also the potential pressure for structural and material changes to the heritage item to enhance acoustic attenuation, such as changes to fenestration and doors. Such changes are likely to have unacceptable and undesirable impacts on the heritage item.	A heritage response to this matter has been prepared by NBRS in <b>Appendix E</b> .
It is also necessary to ensure that the occupants of 'Roma' are still afforded a reasonable amount of solar amenity. The impact of overshadowing and visual privacy and the merits of any future built forms will be considered in more detail once detailed building designs have been developed as part of future Development Applications. However, based on the 'worst case scenario', the proposed building envelopes generally indicate that some level of direct solar access will still be afforded to the heritage item, indicating that the overall form and height of the indicative building envelope to 'Building C' is acceptable.	A detailed solar access study will be undertaken to form part of any future DA applying to the site.
<b>Recommendation:</b> The location of the proposed vehicular access driveway together with the incorporation of utilitarian service areas along the eastern elevation of 'Building C' provides a poor level of amenity and an unacceptable outcome to the adjoining heritage item. The use of this space as an access driveway to the delivery dock will also create an unacceptable acoustic impact on the occupants of the heritage item, increasing pressure for the introduction of acoustic attenuation measures along boundary fencing and /or to the heritage item itself, which in turn are likely to	A concept supermarket plan has been prepared (see <b>Appendix G</b> ) that demonstrates the functionality of the supermarket within the context of the site. The front of house of the store addressing both Rocky Point Rd and partially to Targo Rd allows for direct connection and activation to the street and internally, linear aisles and direct connections to relevant behind counter prep areas. The introduction of a Targo Rd accessed loading dock would severely disrupt the functionality of the supermarket, it will result in the



<p><i>have an unacceptable visual and physical impact on the heritage item. The access driveway should be relocated accordingly.</i></p>	<p>development of the supermarket being unfeasible and economically prohibitive, and therefore the redevelopment of the site would not be realised.</p> <p>Additionally, Targo Road is a local road compared to Ramsgate Road, and therefore introduction of a commercial vehicular accessway from Targo Road has the potential to create undesirable acoustic impacts on the site's surrounds. See <b>Section 2.2.2</b> of this report for further discussion.</p> <p>To mitigate acoustic concerns relating to the driveway's relationship with the Roma apartments, a loading dock management plan will accompany any future development application applying to the site. The installation of any acoustic attenuation measures in or around the site will be subject to a detailed heritage impact statement for a future development application applying to the site.</p>
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### 3.2 Stormwater

<p><i>Site stormwater management report is to be prepared to demonstrate that the site discharge system is satisfactorily draining to the public drainage system aligning with Council's stormwater management policy (The Policy). There is insufficient drainage system available in the vicinity and hence the development proposal should be incorporating new drainage system by considering upstream catchments and upgrading the existing ones to form a satisfactory drainage design delivery for the development.</i></p> <p><i>Considering the subject site area (6400 sq meter), stormwater quality requirements along with water sensitive urban design measures to be incorporated to manage pollution release out of the development as per Section 7 of the Policy.</i></p>
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Whilst these comments are acknowledged, both of the stormwater matters relate to detailed design and will be dealt with at a future DA stage in the development process.

### 3.3 Traffic

The considerations raised in the traffic referral response are summarised in **Table 2** below with corresponding responses as appropriate.

**Table 2 Traffic Referral**

Consideration	Response
<b>Parking Provision</b>	
<i>The proposed mixed use development site has a parking provision of 348 spaces on-site which meet TfNSW's parking requirement, however it does not satisfy Council DCP requirement of 385 spaces.</i>	Noted.
<i>The proposed development site is located more than 800m from a train station, it is therefore necessary to provide flexible/adequate parking provision on-site as per Council DCP of 385 spaces to meet both residential and commercial parking demand.</i>	Noted. A revised indicative reference scheme has been prepared by CHC (see <b>Appendix A</b> , Sheets CP02, CP12) which has included a new basement parking level (Basement 03) in order to provide additional parking space for both the residential and retail components of the development to comply with the GRDCP 2021 parking requirements.
<b>Traffic Data</b>	
<i>Traffic modelling undertaken based on 2021 traffic counts data which may not necessarily represent the existing traffic patten due to post Covid impact. Ideally traffic modelling shall be undertaken using recent traffic counts in 2023/2024 outside school holidays to replicate existing traffic conditions to assess traffic impact from the development.</i>	Updated traffic data has been undertaken by CBRK. The dates of traffic counts occurring is Saturday 14 October and Thursday 19 October 2023.
<b>Traffic Impact and Road Network Upgrade</b>	
<i>In order to accommodate future traffic generated from the development, the following road network upgrades are necessary/ warranted:</i>	
<ul style="list-style-type: none"> <li><i>New Traffic signals at Targo Road/Rocky Point Road and Targo Road/Ramsgate Road (as identified in the traffic report and meet the traffic signal warrant)</i></li> </ul>	Noted. New traffic signals at intersections of Targo Road with Rocky Point Road and Ramsgate Road are proposed and will be subject to a future DA.
<ul style="list-style-type: none"> <li><i>Removal of mid-block pedestrian crossing at Rocky Point Road</i></li> </ul>	Noted. The existing pedestrian signals will be removed and subject to a future DA.
<ul style="list-style-type: none"> <li><i>Concrete median island at Ramsgate Road from Rocky Point Road and site frontage</i></li> </ul>	Measures are currently being investigated to limited Ramsgate Road access to left-in and left-out. This will be subject to a future DA.
<ul style="list-style-type: none"> <li><i>The provision of roundabout at Targo Road and Burgess St (to assist with additional traffic volume at this intersection)</i></li> </ul>	The roundabout at Targo Road/ Burgess Street is not required to accommodate development traffic, as the existing priority controlled intersection would operate at a satisfactory level of
<ul style="list-style-type: none"> <li><i>The provision of new traffic signal at Rocky Point Road and Torwood St to allow southbound right turn vehicle access site via Torwood Street, The Promenade and Targo Road.</i></li> </ul>	Traffic modelling indicates there is no nexus between the proposed development and new traffic signals at Rocky Point Road/Torwood Street. Therefore, no signals are proposed or will be proposed as part of the future DA.
<b>Commercial Loading Dock</b>	
<ul style="list-style-type: none"> <li><i>Loading dock off Ramsgate Road (from higher order road) is not ideal and may create potential safety concerns and rear end crashes. All vehicular access including commercial loading dock shall be provided off Targo Road (from lower order road), if possible.</i></li> </ul>	<p>As noted above, the proposed location of the loading dock and access driveway will remain at Ramsgate Road, as this has always been the preferred location. The primary reasons for this being the preferred location are:</p> <ul style="list-style-type: none"> <li>Positioning the access driveway in the proposed location enables access to be provided to the site but also maintains the current arrangement</li> </ul>

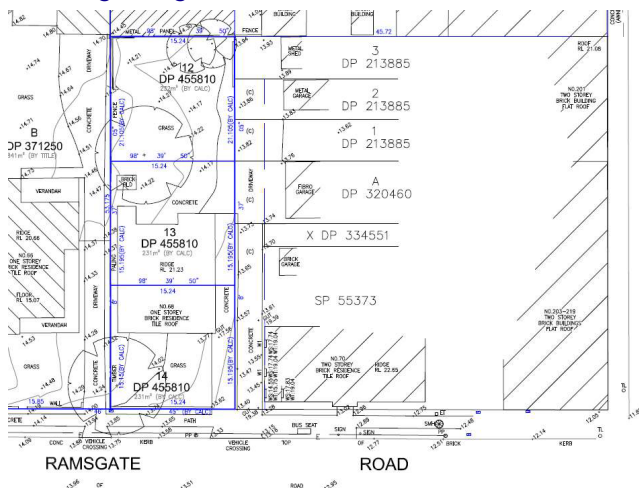
	<p>for service access to the businesses fronting Rocky Point Road, specifically 201-209 Rocky Point Road. If the commercial loading dock was relocated to Targo Road, as per GYDE's and Council's Traffic and Heritage teams' recommendation, there would be insufficient width provided to facilitate vehicle access to the properties along Rocky Point Road.</p> <ul style="list-style-type: none"><li>• The proposed access arrangement provides an outcome that is consistent with the existing Right of Way.</li><li>• It will ensure a better safety outcome in that vehicles and trucks will be able to enter/exit in a forward direction.</li><li>• It achieves an outcome that will not impact existing properties along Rocky Point Road and not disturb residents on Targo Road.</li></ul>																											
<ul style="list-style-type: none"><li>• <i>If commercial loading dock be approved off Ramsgate Road, design vehicle swept path shall be demonstrated that design vehicle In/Out turning path can achieve using kerbside lane only.</i></li></ul>	Updated swept paths have been prepared by CBRK and are provided at <b>Appendix D</b> , Sheets A1-A2. The updated swept paths shown trucks straddling lane on Ramsgate Road, which is a legal turn.																											
<b>Residential Loading Dock:</b>																												
<ul style="list-style-type: none"><li>• <i>There is no provision for delivery vehicle (removalist vehicle) and emergency vehicle (ambulance) on-site for 144 residential units.</i></li></ul>	A revised indicative reference scheme has been prepared by CHC (refer to <b>Appendix A</b> , Sheet CP12), which provides a space for delivery vehicles and emergency vehicles to service the residential component of the proposal. The location of this space is located at the end of the access driveway which has been created as a result of shifting the location of the residential lift from basement to podium level to sit between the Direct-To-Boot lift and stair to sit further away from the boundary so residential moving trucks can sit alongside Building C when parked as opposed to the boundary																											
<ul style="list-style-type: none"><li>• <i>Separate loading dock shall be provided on-site for residential component for waste collection, delivery and emergency vehicle use.</i></li></ul>	Waste collection for the residential component of the proposal will be via the access driveway from Ramsgate Road. As part of a future DA private collection times can be arranged to ensure there is no clash with the Woolworths loading dock times.																											
<ul style="list-style-type: none"><li>• <i>There will be no consideration of a loading zone on-road.</i></li></ul>	Noted. The proposal does not propose a loading zone on-road.																											
<b>Parking Provision</b>																												
<ul style="list-style-type: none"><li>• <i>The quantum of parking proposed for the development for the residential, supermarket and retail components is assessed by the applicant using parking rates in TfNSW Guidelines which has parking rates lower than those in the GRDCP2021. The TfNSW parking rates used are those for a RFB development in excess of 800m from a railway station.</i></li><li>• <i>A summary of minimum parking requirements using the 2 assessment methods is as follows:</i></li></ul>	<p>The indicative reference scheme has been amended by CHC to provide 3 levels of basement parking with 200 retail parking spaces and 245 residential parking spaces (see <b>Appendix A</b>, Sheets CP09-CP11).</p> <p>Notwithstanding this, the planning proposal does not seek approval for the parking numbers to be developed on the site. The proposed design is a reference scheme only, intended to represent a proof of concept for the future development of the site. Any proposed parking numbers will be the subject of a future development application to be assessed and determined at a future date.</p>																											
<table><tr><th>Assessment Method</th><th>Resident Vehicles</th><th>Resident Visitor Vehicles</th><th>Supermarket</th><th>Retail</th><th>Direct to Boot (DTB)</th><th>TOTAL REQUIRED</th><th>Number of Parking Spaces Proposed</th><th>GRDCP2021 Shortfall</th></tr><tr><td>TfNSW Guidelines</td><td>131</td><td>29</td><td>157</td><td>6</td><td>1</td><td>324</td><td>348</td><td>39</td></tr><tr><td>GRDCP2021</td><td>166</td><td>29</td><td>187</td><td>3</td><td>2</td><td>387</td><td></td><td></td></tr></table>	Assessment Method	Resident Vehicles	Resident Visitor Vehicles	Supermarket	Retail	Direct to Boot (DTB)	TOTAL REQUIRED	Number of Parking Spaces Proposed	GRDCP2021 Shortfall	TfNSW Guidelines	131	29	157	6	1	324	348	39	GRDCP2021	166	29	187	3	2	387			
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TfNSW Guidelines	131	29	157	6	1	324	348	39																				
GRDCP2021	166	29	187	3	2	387																						

<ul style="list-style-type: none"> <li>Having regard to there being an observed high demand for on street parking much of the day and night in the mostly R2 residential zoned Targo Road in the section between Rocky Point Road and Burgess Street, the section containing the proposed development, and the one in which residents and visitors will seek on street parking in the first instance when unable to park on site, it is recommended that to minimize the effect on residents in existing dwellings in Targo Road, the development should have <b>at its minimum</b> parking rates complying with <b>GRDCP2021</b>.</li> </ul>	
<ul style="list-style-type: none"> <li>In addition to the above, of the 167 car spaces proposed for residents in basement 02, a total of 24 of the 144 units have tandem parking. This results in there being 119 parking spaces available for 120 units and hence one(1) unit has no offstreet parking. To further minimize the impact on street parking, <b>it is recommended that a parking rate be set for the site that makes provision for all 1 and 2 bedroom units to have at least one (1) off street parking space.</b></li> </ul>	<p>The additional basement parking level provided in the revised indicative reference scheme prepared by CHC (see <b>Appendix A</b>, Sections 03.01.01-03.02.03) has allowed for a reduction in tandem car spaces (from 26 to 19) and accommodated the suggested parking rate for the residential component for 1 &amp; 2 bedroom units to have at least 1 assigned off-street parking space each to help alleviate the impact on street parking. This is also a matter that will be the subject of further design development, assessed in detail and then determined at the development application stage. It is not a matter that is determinative at this rezoning stage.</p>
<b>Provision for Bicycles</b>	
<ul style="list-style-type: none"> <li>The application makes no provision within either basement for the parking of bicycles for residents, resident visitors, and the retail component. Bicycle parking will need to be provided in accordance with the requirements of GRDCP2021 for a total of some 92 bicycles in a secure facility(s) as described in AS 2890.3:2015 Parking Facilities, Part 3- bicycle parking.</li> <li>It is unlikely provision for bicycle parking can be incorporated into the either basement 01 or 02 without changes to car park layout and design. Provision should also be made for the parking of bicycles within the site at ground floor/street level for the parking of shoppers' bicycles.</li> </ul>	<p>Based on Council's feedback, a bicycle parking allowance will be provided on the ground floor in the deep soil planting setback zone and also on the podium level of the residential component of the development (see Drawings CP12 and CP13 in <b>Appendix A</b>, Sheets CP12-CP13).</p>
<b>Service Vehicle Access-Ramsgate Road</b>	
<p>The proposed "Access Driveway" from Ramsgate Road for heavy rigid vehicle (HRV) access is not support for the following reasons:</p>	
<ul style="list-style-type: none"> <li>The access roadway catering for HRV's has a proposed width of 6m between walls etc., on either side. The driveway requires a minimum width of 6.5m kerb to kerb/ wall to wall to comply with width requirements in s3.3 Circulation roadways in AS2890.2 2018 Parking Facilities Part 2- off street car parking</li> </ul>	<p>It is reiterated service vehicle access from Ramsgate Road is the preferred option as it removes heavy vehicles on Targo Road, which was a major concern raised by residents in the previous planning proposal. Further, service vehicle access from Ramsgate Road is appropriate, as it separates service vehicle access from retail and residential vehicle access, noting there is insufficient frontage in Targo Road to provide separate service and carpark driveways.</p> <p>The proposed access driveway can accommodate a 12.5m truck and turns will be limited to low frequency left turns.</p>
<ul style="list-style-type: none"> <li>Heavy vehicles turning into and out of the site on the high traffic volume Ramsgate Road increases the potential for rear end and other type crashes.</li> </ul>	
<ul style="list-style-type: none"> <li>The width of the driveway at the Ramsgate Road boundary with a large splay on one side results in a large area of Council's footpath becoming a vehicle crossing which increases the potential for vehicle/pedestrian conflict.</li> </ul>	<p>The splay of the access driveway has been reduced and additional planting has been provided.</p>
<ul style="list-style-type: none"> <li>The vehicle crossing will result in heavy vehicles crossing the footpath at the rear portion of an existing bus zone. The bus zone cannot be relocated to the east as it will be too close to the traffic signals at Rocky Point Road and relocating it to the west, will result</li> </ul>	<p>Noted. There is no impact on the bus stop.</p>

<p><i>in it before further from the shopping precinct and an unsuitable location for passengers getting on or off a bus.</i></p>	
<ul style="list-style-type: none"> <li><i>With the main lobby entry doors to building "C" being on Ramsgate Road, it is considered highly likely the driveway area will be used to drop off/pick residents and resident visitors associated with building "C". In this regard, it recommended the entry lobby to building "C" be positioned at the northern end of the building with access to it being form Targo Road to reduce the incidence of drivers stopping illegally on Ramsgate Road.</i></li> </ul>	<p>Relocation of the lobby to the northern end of the building is not feasible. The location of the lobby on Ramsgate Road will provide active frontage and passive surveillance. Driver behaviour can be managed through operational measures to be put in place by a future DA. Further, the driveway will be clearly signposted no parking.</p>
<b>Additional Comments</b>	
<p><b>Through Site Link</b></p> <ul style="list-style-type: none"> <li><i>The location and design of the through site link in the 6m setback to the western boundary is considered inappropriate and unsatisfactory. The location with fencing on the western side and a unit block walls on the eastern side with a change in direction approximately mid length affords users of the pathway link a reduced level of safety both day and night. It is considered a through site link should be provided centrally within the site in a more open and visible location.</i></li> </ul>	<p>As noted above, the through-site link is proposed to be removed and no longer forms part of the Planning Proposal.</p>
<p><b>Vehicular Access-Targo Road- Street trees</b></p> <ul style="list-style-type: none"> <li><i>The proposed location of vehicular access to and from the site on Targo Road requires the removal of a significant street tree. It is understood the removal of the tree is not supported by Council's Senior Landscape and Arboriculture Officer</i></li> </ul>	<p>As noted in <b>Table 4</b>, the existing street tree in front of 4 Targo Road will be retained, which is the reason for the splay in the driveway to avoid the need for removal. This will be a matter that will be subject to further design development as part of the DA process to ensure its retention.</p>
<p><b>Bus Stop Relocation – Rocky Point Road, west side, south of Hastings Road</b></p> <ul style="list-style-type: none"> <li><i>Should the existing midblock pedestrian crossing on Rocky Point Road north of Targo Road be approved for removal and a new set of traffic signals be installed to the south at the intersection of Rocky Point Road and Targo Road, it is recommended consideration be given by Council's Traffic Engineers to removing the existing bus stop on Rocky Point Road, west side south of Hastings Road, and installing it on the northern side of the new traffic signals. This location will have the bus stop in a similar location to an existing bus stop on the opposite, eastern side of Rocky Point Road which is a preferred TfNSW arrangement and afford passengers a better level of protection from the weather when getting on and off buses at a location with existing shop awnings.</i></li> </ul>	<p>Noted. This will be addressed and subject to a future DA and approval by TfNSW. If the new traffic signals are provided at the intersection of Targo Road/ Rocky Point Road, the existing northbound bus stop on Rocky Point Road should be relocated closer to the new signals.</p>
<p><b>Retail Traffic Generation Rates</b></p> <ul style="list-style-type: none"> <li><i>Section 3.23 of the traffic report prepared by Colson Budd Rogers and Kafes states "Estimates of traffic generated by the retail have been based on the supermarket/specialty retail rates used for the similar South Village mixed residential site at Kirrawee" and following the statement, the consultant includes details of the rates used to assess traffic generation.</i></li> <li><i>Any future reports to Council that use those rates for the South Village will need to include full details as to how and when those rates were determined.</i></li> </ul>	<p>The traffic assessment has been updated using standard TfNSW traffic generation rates for a supermarket.</p>
<ul style="list-style-type: none"> <li><b>Potential Development Site – 201 to 219 Rocky Point Road, Ramsgate</b></li> <li><i>Should approval be given for service vehicle access to this Planning Proposal site being maintained off Ramsgate Road adjacent to the eastern/common boundary with properties 201-219 Rocky Point Road and should those lands at 201-219 be consolidated into one(1) lot in the future for a mixed use or other development, it is recommended that provision be made as part of this current Planning Proposal for that part shown as "Access Driveway" that it be a dedicated right-of-carriageway (ROC) benefitting lands at 201-219 Rocky Point Road. Should lands at 201-219 be consolidated into</i></li> </ul>	<p>Noted. A 2.34m wide ROC will be provided along the eastern side of the 6m wide access driveway from Ramsgate Road. When combined with the existing 3.66m wide access within 201-219 Rocky Point Road, a 6m wide access will be provided to existing and future developments on 201-219 Rocky Point Road.</p>

one lot, the accessway at the rear of that site would also need to have a width of 6m approximately to cater for two way truck access.

- These lands it is understood contain a heritage item, a small unit block at 70 Ramsgate Road. The unit block has a 3.66m ROC on its western side which would restrict any access road/ROC from being widened to 6m. The image below extracted from the survey plan submitted by the applicant shows the 3.66m wide ROC marked a "C" running along the western wall of the unit block and on lands to the north.
- It is considerable preferable to have the "Access Driveway" made a ROC as part of the Planning Proposal to avoid developers at 201-219 having to negotiate a ROC in the future.



- **Proposal for traffic signals at the intersection of Ramsgate Road/Targo Road and The Promenade.**
- Concern is raised in regard to the introduction of a right turn movement for traffic in Targo Road onto Ramsgate Road for traffic to head west on Ramsgate Road. The right turn ban out of Targo Road was implemented many years ago on safety grounds as well as stopping a rat run of southbound drivers on Rocky Point Road turning to the right/west off that roadway both during and outside peak times before reaching the Ramsgate Road intersection which also has a fulltime right turn ban. It is considered highly likely that should the traffic signals be installed as proposed with the right turn ban from Targo Road removed, the rat run will recommence with a large number of drivers turning to the right off Rocky Point Road at the traffic signals at Jubilee Avenue and at Hastings Road to proceed to Burgess Street then Targo Road.
- It is recommended this matter be the subject of discussion between Council's Traffic Engineer and TfNSW and consultation with affected residents.

As part of the previous planning proposal to manage increased traffic flows in the residential precinct north of Ramsgate Road and west of Rocky Point Road, Council identified that LATM measures would be required. The current planning proposal proposes a similar approach and will work with Council to develop appropriate LATM measures in the precinct.

**Proposed median island- Ramsgate Road, west of Rocky Point Road.**

- Should a central median island be installed on Ramsgate Road west of Rocky Point Road that includes the intersection of Dalkeith Street limiting movements to left in/left at Dalkeith Street, it is recommended Council's Traffic Engineer in consultation with TfNSW consider implementing a right turn movement for traffic in The Promenade onto Ramsgate Road which is currently banned. Drivers currently turning to the right out of Dalkeith Street onto Ramsgate Road mostly do so to travel across Rocky Point Road as there is a full time right turn ban for northbound vehicles to turn to the right/east from Rocky Point Road into Ramsgate Road. By banning a right turn out of Dalkeith Street and maintaining a right turn ban from The Promenade onto Ramsgate Road, drivers will use The Promenade to access the new signals at Ramsgate Road, cross Ramsgate Road into Targo Road to Burgess Street then proceed to the new signals at Targo Road and Rocky Point Road, turn right

No median is proposed on Ramsgate Road opposite the site access. As the access is limited to service vehicles only, with low traffic flows, left-in/left-out access will be managed by signage and through a loading dock management plan to be prepared and submitted as part of the future DA.



<i>and then left at Ramsgate Road. This will as a result increase traffic movements into Targo Road and onto Rocky Point Road.</i>	
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### 3.4 Trees and Landscape

The considerations raised in the trees and landscape referral response are summarised in **Table 3** below with corresponding responses as appropriate.

**Table 3** Tree and landscape referral

Matter	Response
<b>Senior Landscape and Arboriculture Assessment Officer Comments</b>	
<p><i>I have reviewed the submitted documentation for 193-199 Rocky Point Road, 66-68 Ramsgate and 2-4 Targo Road Ramsgate (PP2024/0001) for the development of 144 apartments, supermarket + 2 levels basement parking and specialty retail. The application seeks to:</i></p> <ul style="list-style-type: none"> <li>• amend the existing zoning,</li> <li>• amend building height,</li> <li>• amend floor space ratio,</li> <li>• introduce site specific provisions under part 6 of GRLEP 2021 and,</li> <li>• reclassification of a Council owned Lot</li> </ul>	<p>Noted.</p>
<p><i>I have briefly reviewed Urban Design comments for the previous submissions with regards to landscaping and deep soil issues. I note that ADGs 'deep soil zones' of 7% of the site area to be provided as deep soil zones, with a minimum dimension of 6m for sites greater than 1,500sqm had not been met. The basement plan indicates a 5.1 meter setback along the north-western boundary, this setback does not meet the ADGs requirement of a 6 metre deep soil zone.</i></p>	<p>We acknowledge Council's comments, however we note that the Design Guidance for ADG also states the following:</p> <p><i>"Achieving the design criteria may not be possible on some sites including where:</i></p> <ul style="list-style-type: none"> <li>• <i>the location and building typology have limited or no space for deep soil at ground level (e.g. central business district, constrained sites, high density areas, or in centres)</i></li> <li>• <i>there is 100% site coverage or <b>non-residential uses at ground floor level</b>".</i></li> </ul> <p>The indicative reference scheme has been amended by CHC to remove the through-site link as a result of the safety and security risks outweighing the public benefit of creating a link between Targo and Ramsgate Roads. The land previously dedicated for the through-site link will now be used only for deep soil planting which has increased the deep soil area from 7.26% to 9.06%. While the proposal currently has 5.1m in some parts of the allocated deep soil planting zone, we note 340m<sup>2</sup> of the required 447m<sup>2</sup> (7%) has the required minimum dimension of 6m. The indicative reference scheme provides additional deep soil planting, making the total deep soil provided 9.06% of the total site area, exceeding the total percentage required. This is a matter that will also be subject to further design development at the development application stage, the indicative reference scheme however demonstrates that a suitable deep soil provision can be achieved on the site.</p>
<p><i>The concept landscape plan prepared by SQ1 dated 15 December 2023 indicates the planting of 32 canopy trees along the western boundary. The plan is not accurately scaled; however, the location/position of the trees appear to be too close together, this will result in poor tree form and condition, a reduced life expectancy which in turn affects the long-term benefits provided by canopy trees. The location/position of new tree plantings within the 'Communal Open Space' area is different from what is shown on the concept landscape plans. Furthermore, this area will predominately be overshadowed throughout the day. Again, this will greatly</i></p>	<p>As noted by Council the proposed landscape plan prepared by SQ1 is conceptual and the separation between trees to ensure adequate tree growth will be resolved as part of any future development application on the site. Similarly, the volume of soil required to support healthy canopy trees within the communal open space will be provided at the future detailed design and DA stage.</p>

Matter	Response
<p><i>affect the long-term viability of the proposed landscaping inc. tree planting. The landscape plans are concept, therefore the volume of soil to support healthy canopy trees has not been provided. Adequate soil volumes in accordance with the ADG for planting on structure must be implemented to ensure successful landscaping.</i></p>	
<p><i>Aerial imagery shows existing trees within and surrounding the site, in particular two (2) large mature Council owned street trees that will be negatively impacted by the proposed development. An Arboricultural Impact Assessment has not been submitted with the documentation. Street trees are important Council owned and managed assets that contribute greatly to the local environment and streetscape. It is therefore important that these trees be suitably retained and protected throughout the development process.</i></p> <p><i>Considering the proposal seeks to increase the scale of development, the development should be exceeding ADG requirements rather than underproviding amenity to the local environment.</i></p>	<p>To address Council's concerns regarding street trees, we would like to clarify the two trees located on Targo Road, adjacent to the north-western corner of the site are to be retained and we will not seek to remove these trees as part of any future development on the site. We note the proposal is located south of these trees and therefore will not preclude the trees access to natural light.</p> <p>Further, the proposal has been revised to provide a deep soil planting corridor within the entire setback from the western boundary, as a result of removal of the through-site link. The deep soil planting corridor will include native vegetation and planting which is currently not found on site and on surrounding sites. The proposal provides approximately 9.06% of deep soil, which is in excess of the ADG requirements. Additionally, landscape planting will be provided at the podium level.</p>
<b>Recommendations</b>	
<p><i>1) That all existing Council owned and managed street trees be adequately retained and protected.</i></p>	As noted above the two street trees located at Targo Road will be retained and protected,
<p><i>2) That an Arboricultural Impact Assessment prepared by a suitably qualified and experienced AQF Level 5 Arborist be submitted.</i></p>	An Arboricultural Impact Assessment will be prepared and submitted as part of any future DA on the site.
<p><i>3) That the proposed tree planting locations on all plans be coordinated and consistent.</i></p>	Noted.
<p><i>4) That ADGs 'deep soil zones' of 7% of the site area to be provided as deep soil zones, with a minimum dimension of 6m for sites greater than 1,500sqm be provided. This will require a further setback of the proposed basement along the north-western boundary.</i></p>	As noted above, the ADG provides exceptions to deep soil requirements. While the proposal currently has 5.1m in some parts of the allocated deep soil planting zone, we note 340m <sup>2</sup> of the required 447m <sup>2</sup> (7%) has the required minimum dimension of 6m. As the through-site link along the western boundary has been removed from the indicative reference scheme and replaced with additional deep soil planting, the total deep soil provided is now 9.06% of the total site area, exceeding the total percentage required.
<p><i>5) That the proposed canopy tree plantings are adequately spaced to avoid overcrowding. Tree sizes at maturity must be shown on the plans to demonstrate appropriate positioning that will reduce the negative effects of overcrowding i.e. poor tree form and condition, reduced life expectancy that negatively affects the long-term benefits of canopy trees.</i></p>	Noted. This will be addressed during detailed design and as part of any future DA.
<p><i>6) That the proposed tree planning within the 'Communal Open Space' area has adequate soil volumes in accordance with ADG 4P 'Planting od Structures'.</i></p>	Noted. This will be addressed during detailed design and as part of any future DA.

Matter	Response
<i>7) That tree planting and vegetation are suitable located to take advantage of available sunlight to ensure successful planting/landscaping of the site.</i>	Noted.
<i>8) That a Public Domain plan that include future street tree plantings be provided. It is necessary that design elements such as awnings are suitable setback to not conflict with future tree canopy.</i>	There is no opportunity on Rocky Point Road for street tree planting as there is only a 2.5m footpath and existing power poles. However, the proposal will provide a deeper setback at the corner of Targo Road and Rocky Point Road by relocating the fire stairs to create opportunities for seating and planting as a gathering space for the local community. There are opportunities for future street planting to be provided along Ramsgate Road, as the proposal is setback 6m and the revised reference scheme indicates future landscape areas that could be utilised to provide street tree planting. As noted above, the existing street trees at Targo Road will be retained and no awnings are proposed along Targo Road to ensure future street trees are not obstructed.
<b>Senior Assets Engineer – Open Space Assets comments</b>	
<i>The new pedestrian laneway connecting Ramsgate and Targo must be maintained by developer. Long corridor and dog leg in the laneway will be at risk of vandalism and antisocial. The detail design need to address this issue e.g wider laneway, façade treatment, planting, furniture arrangement and subtle lighting.</i>	As part of the revised reference scheme, the through-site link is proposed to be removed, and the western boundary will now be a part 5.1m and part 6m landscaped setback. Planting details will be provided at the DA stage.
<i>Can the developing sections of Ramsgate Rd and Rocky Point Rd powerline be diverted underground?</i>	The Proponent is open to discussion about the potential for this as part of the DA stage and in consultation with the relevant utility provider.
<i>Street tree planting over basement structure. Need to provide sufficient soil volume as per ADG.</i>	The soil volumes will be provided and addressed during detailed design and as part of any future DA.
<i>Wider street front setback documented but not clear on the 3D graphic or section showing streetscape character.</i>	In response to Gyde's comments to improve public amenity, the façade at the Ground floor along Rocky Point Road is proposed to be setback from the site boundary to allow for a wider footpath approximately 3.5m along Rocky Point Road.
<i>2 x large Euc on Targo Rd required some consideration for protection.</i>	As noted above, the two large eucalyptus trees on Targo Road will be retained and protected.
<i>Communal open space on podium should consider elements of children plays and outdoor fitness to alleviate pressure on public assets in nearby parks as there is limited resource and spaces. Developer contribution is required for upgrade to Claydon Reserve assets, particularly playground.</i>	Noted. The elements of the proposed communal open space will be resolved during detailed design and addressed as part of any future DA.
<i>Winter solstice diagram shows the site is shaded most of winter. Plant species selection is critical at ground floor and private podiums.</i>	Noted. The specific plant species will be addressed during detailed design and as part of any future DA.
<i>Site analysis did not identify the cold Southerly wind which is expected to sweep through the new laneway. Pedestrian comfort and resilience planting to be considered.</i>	As noted above the through-site link is proposed to be removed and no longer form part of the Planning Proposal.
<i>Not liking the bamboo in landscape document. The leave litters will be problematic for stormwater drainage if not maintained.</i>	Noted.

Matter	Response
<p><i>Streetscape upgrade to Ramsgate Rd, Rocky Point Rd and Targo should follow Council's public domain guide.</i></p>	<p>Noted. The streetscape upgrade of Ramsgate Road, Rocky Point Road and Targo Road will be in accordance with Council's public domain guide and addressed as part of any future DA.</p>

### 3.5 Urban Design

The matters raised in Council's urban design internal referral are discussed in **Table 4** below.

**Table 4 Urban Design Referral**

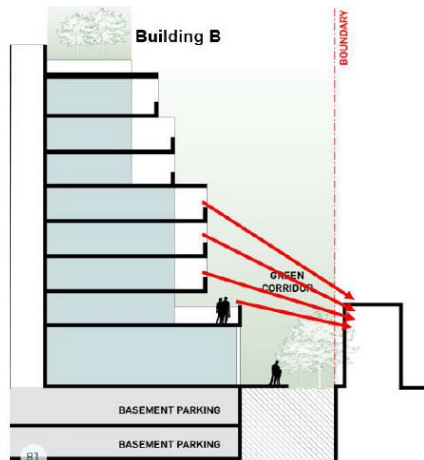
Matter	Response
<b>Principle 1: Context and neighbourhood character</b>	
<p><b>Exclusion of No.6 Targo Road</b></p> <p><i>The subject site is not identical to the previous proposals as No.6 Targo Road has been excluded.</i></p> <p><i>The supporting documentation does not provide any justification for the exclusion of No.6 Targo Road (No.6). Significant concern is raised regarding the exclusion of No.6 from the Planning Proposal and accompanying concept scheme due to site isolation impacts for No.6 and the overall reduction in total site area and lot frontage on Targo Road for the subject proposal. It is understood that the Planning Proposal has not provided any evidence to demonstrate that No.6 cannot be included within the concept scheme.</i></p> <p><i>No.6 is a small site with 480sqm site area and a 9m frontage. Despite its existing R4 zoning, it has restricted development potential due to the presence of an existing multi dwelling housing development to the west at No.8 Targo Road. The Georges River DCP 2021 requires a minimum site area of 1,000sqm for residential flat building (RFB) developments while the Georges River LEP 2021 requires a minimum site area of 800sqm for medium density developments. No.6 does not satisfy either of the minimum site area requirements and therefore is unlikely to be redeveloped beyond its existing low density residential typology.</i></p> <p><i>Accordingly, the subject Planning Proposal must be amended to include No.6 within the subject site.</i></p>	<p>As discussed in <b>Section 2.2.1</b> above, this matter was similarly raised by Gyde Consulting in their review. Whilst landowner's consent is not required for a site to be included in a planning proposal, a planning proposal is based on a reference scheme with an intended future built form that is used to justify the proposed LEP amendments and to inform the preparation of a site-specific DCP. That DCP would then be used as the basis for assessing a future development application for the site.</p> <p>Landowner's consent is required for a development application to be lodged, and it is worth noting that despite the Proponent's best endeavours to acquire No. 6 Targo Road, the landowner has made the decision that they no longer wish to be a part of the proposed development. Given the landowners stated desire not to be part of the proposed development going forward, designing a proposal that factors in No.6 Targo Road is considered unwise at this stage. Reflecting this in a site-specific DCP would have the potential to prejudice the achievement of a future development outcome and for this reason it has not been included.</p> <p>Furthermore, we do not consider that No. 6 Targo Road is at risk of experiencing site isolation in its true sense. It is not a corner site and is capable of future development through amalgamation with adjoining sites to the west. Architectural modelling has been prepared to demonstrate a potential future development scheme which is able to coexist with the proposed development scheme on the subject site to the east (see Drawings CP26 and CP27 in <b>Appendix A</b>).</p>
<p><b>Absence of vehicle access for 201-209 Rocky Point Road</b></p> <p><i>The adjoining properties at 201-209 Rocky Point Road are excluded from the Planning Proposal but do possess the development potential for redevelopment as a consolidated site in future. These sites have a combined site area of approximately 1,600sqm – which should enable a mixed used development to be built to the full potential of the existing HOB and FSR controls under the Georges River LEP 2021. The previous Kogarah DCP 2013 included a control which required a 5m laneway to be provided at the rear for vehicle access. The intent is to accommodate Council's waste collection vehicles to access these sites. Council's waste collection vehicles are larger than a MRV. The proposed concept scheme features a 6m wide 'laneway' accessed from Ramsgate Road which is sufficient to accommodate delivery vehicles for the proposed supermarket. It is unclear whether this laneway will be made available as an easement along the eastern</i></p>	<p>The vehicle accessway from Ramsgate Road has been designed to operate as a shared driveway so that if 201-209 Rocky Point Road should be redeveloped as a consolidated site in the future, that it will benefit from rear access off Ramsgate Road (see <b>Appendix A</b>, Sheets CP12, CP25).</p>



<p>boundary of the subject site to enable future vehicle access to 201-209 Rocky Point Road. It is requested that an easement be made available, which may occur in the form of a shared path. The concept scheme is also encouraged to allow provisions to enable shared access to 201-209 Rocky Point Road through its basement for any future development.</p>	
<p><b>Conflict between pedestrian and vehicle access on Targo Road</b></p> <p>The proposed concept scheme restricts the entrance to the basement to a singular point at the northwestern corner of the site on Targo Road. All residential and retail traffic must enter and exit the basement car park via this entrance. The accompanying Traffic and Transport Assessment specifies that the proposed development would generate up to 540 vehicles per hour during the peak hours (in this case, the Saturday midday shopping peak). The significant volume of car traffic utilising the basement entrance/exit poses as a substantial risk to pedestrian safety due to its location, which is sandwiched between the pedestrian entrance to Building B and the proposed Green Link.</p> <p>Despite the presence of a proposed Green Link, the Ramsgate Centre will continue to experience restricted pedestrian movement due to the dominance of the basement entrance/exit, therefore undermining the proposal's attempt at improving the walkability and the connectivity of the locality. Accordingly, the concept scheme must be revised to relocate the basement entrance/exit to the western edge of the site to mitigate the conflict between pedestrian and vehicular traffic. The inclusion of No.6 Targo Road within the Planning Proposal will assist with this relocation. The proposal is also encouraged to explore the location of pedestrian access points uninterrupted by vehicle access points for enhanced walkability around the subject site.</p>	<p>This comment is noted and acknowledged. In order to mitigate safety concerns, the location of the residential pedestrian access to the site from Targo Road has been shifted 5m to the east to allow a separation zone between pedestrian movements and vehicle movements. This amendment is reflected in the revised architectural drawings and the revised site-specific DCP in <b>Appendices A</b> (Sheet CP12) and <b>C</b> respectively.</p> <p>We acknowledge Council's comment for enhanced walkability and uninterrupted pedestrian access points, to address this matter the indicative reference scheme has been amended to include a 1m setback from Rocky Point Road to allow for a wider footpath.</p>
<p><b>Principle 2: Built form and scale</b></p>	
<p><b>Height of Building C on Ramsgate Road</b></p> <p>Whilst the provision of a 6m front setback from Ramsgate Road is supported, there is concern that the merits of this interface treatment will be undermined by the 4 storey façade of Building C when viewed from Ramsgate Road. It is recommended for the street wall adjoining the 'Roma' building to be reduced a 2 storey podium to provide a sympathetic response to the adjoining heritage 'Roma' apartments at No.70 Ramsgate Road. Any additional storeys above 2 storeys should occur behind the rear building line of the adjacent heritage item, equating to approx. 10m front setback from Ramsgate Road.</p>	<p>The proposed Building C has been setback 6m from Ramsgate Road to enable the adjacent heritage item to sit forward. We note the provision of a 6m street setback is inconsistent with the typical approach for developments to follow the established setback and alignments of neighbouring developments. Additionally, the proposed 9m building separation provides a sufficient curtilage to the surrounds of the heritage buildings, enabling them to sit prominently within the streetscape. The corner of Building C adjacent to the access driveway has been further splayed to allow for greater visual connectivity from the west along Ramsgate Road to the neighbouring Roma apartment building. A perspective of the proposed Building C looking north from Ramsgate Road is provided in <b>Appendix B</b>, Sections 03.04.03-03.04.04. This demonstrates that the heritage building can still be viewed and sit forward when compared to the upper two levels of Building C which will have minimal impact.</p> <p>As shown in the perspective, there is opportunity for the materiality of the proposed Building C to match the brick of the heritage item to provide a more sympathetic response and treatment. The materiality of any future development will be subject to a future assessment at DA stage.</p>

### Overlooking of adjoining lower density development

There are concerns regarding the privacy impacts on the existing house at No.6 Targo Road due to the exclusion of No.6 from the Planning Proposal. The apartments located on the lower storeys of Building B (shown in section extract below) directly overlook onto No.6 and the existing villa development beyond at No.8 Targo Road.



*It is requested that a consistent side setback of 12m be provided from the western boundary by Building B for all storeys above the podium to mitigate the privacy impacts on No. 6. The western side setback may be maintained at minimum 9m for Levels 1-4 if No.6 is included within the Planning Proposal.*

The western façade of Building B has shifted east to move further away from the western boundary. While the previous indicative reference scheme satisfied ADG requirements in terms of building separation from No.6 Targo Road. To address Council's concerns regarding visual privacy, at Level 1 the façade line has shifted from 8m to 11m from the boundary and from 9m to 11m at levels 2-4. As a result of the increased building separation, the number of proposed apartments has decreased to 141 from 144, however it has improved access to natural light for the proposed apartments and communal open space and reduced impacts on neighbouring properties.

The privacy concerns will also be mitigated through appropriate canopy landscaping along the 6m wide green setback are that runs the full length of the site's western boundary. This area, which includes extensive deep soil will be capable of supporting mature tree species that will provide an appropriate visual buffer between the development and residential buildings to the west.

Planter boxes will be proposed to the outer edges of the balconies along this façade to further reduce the extent of overlooking which can take place from the balcony.

These design measures will be subject to detailed assessment during a future DA for the site.

### Location of Green Link

The initiative to provide a through-site link to connect Ramsgate Road with Targo Road is commended and will enable greater activation and connectivity for the centre's active transport network. However, the proposed Green Link cannot be supported in its current state due to significant concerns regarding its safety and the amenity impacts on the adjoining neighbours. The proposed Green Link is located along the western boundary which is adjacent to the existing low density developments at No.6 and No.8 Targo Road. The accompanying Urban Design Report envisages the Green Link as a public link for both pedestrians and bicycles as well as a space for social interactions embellished with outdoor furnishings. The noise generated by the users of the Green Link is likely to have adverse impacts on the amenity of the neighbouring residents. Due to the irregular shape of the western boundary, the proposed Green Link is not a linear path. There is the absence of direct lines of sight into the entirety of the Green Link from the public domain. There is a small segment of the Green Link that will experience limited visibility from adjoining public roads. With the exception of a 5m wide pedestrian entrance at the western façade of Building B, the Green Link is enclosed by solid walls to the east and a solid metal fence to the west. Significant concern regarding the safety of this space is raised when considered against CPTED principles due to the lack of adequate passive surveillance.

*In light of the above amenity and safety concerns, it is recommended that the provision of a linear through-site link is prioritised in future iterations of the concept scheme. The through-site link must have direct line of sight to and from Targo/Ramsgate Roads. This may be provided as a partial arcade where it is not possible for the through-site link to be open to the sky. The inclusion of No.6 Targo Road within the subject site offers the opportunity for any displaced deep soil zones to be recuperated so a vegetated buffer can be maintained at the western*

As discussed in **Section 2.2.3** of this report, the commentary provided by Cyde Consulting relating to the viability of the green through-site link have been taken into account and have resulted in its removal from the proposed design. This is reflected in the revised architectural drawings and the updated site-specific DCP in **Appendices A and C** respectively.

<p>boundary. Balconies may cantilever over the deep soil zones to enable viable floorplates. Additionally, the basement entrance/exit is recommended to be relocated to the northwestern corner of the expanded development site as outlined in Principle 1: Context and Neighbourhood Character above.</p>	
<b>Principle 3: Density</b>	
<p>The concept scheme is comprised of 144 dwellings and 4,011sqm of retail floor space. It is recognised that the provision of a full-line supermarket at ground level will provide access to jobs and essential goods for the local area. However, the proposal has not addressed the increased demands for open space which will be generated by the additional population. The subject site is well-located in terms of access to existing public open space as it is within 400m of Claydon Reserve and Beverley Park Golf Course and within 800m of Rotary / Scarborough Park in the Bayside LGA. Nonetheless, priority is placed on the provision of communal open space with good amenity to ensure the future residents have access to open space to supplement the high density nature of their dwellings.</p> <p>The accompanying Environmental Wind Assessment identifies that the communal open space on top of the podium would be subject to gusty and turbulent wind flows in the wakes of the towers and within the vicinity of the building corners and could begin to approach the safety limit. This raises significant concerns regarding the amenity and safety of the communal open space provided by the concept scheme. Although the rooftop communal areas on Buildings A, B and C are expected to achieve the level of comfort suitable for walking (8m/second, equivalent to 28km/hr), it is not guaranteed that these rooftop areas will achieve the level of comfort suitable for standing or sitting. Therefore, the lack of usability of the proposed communal open space is likely to result in additional demands being placed on nearby public open space as future residents have no access to quality outdoor spaces within the Site. The poor amenity and safety of the communal open space is attributed to an excess of density sought by the Planning Proposal as the above-podium towers exacerbate the impacts of downdraught winds on the spaces below (i.e. the communal open spaces). Additionally as noted in the commentary under Principles 4 and 6, the concept scheme cannot comply with ADG natural ventilation requirements. Accordingly, it is recommended for the proposal to review the bulk and scale of the towers and by extension the residential density sought by the Planning Proposal.</p>	<p>The Proponent has provided an initial public benefit offer as part of the Planning Proposal, which entails a contribution to deliver local public benefit. As part of ongoing negotiations, the Proponent is willing to discuss the possibility of some of the public benefit contribution being directed towards improvements works to surrounding local parks and open space areas. (e.g. Claydon Reserve)</p> <p>Regarding the environmental wind conditions of the podium and rooftops of Buildings A, B and C, these comments will be addressed by undertaking a wind tunnel study for any future DA applying to the site. This has been addressed in written advice prepared by MEL Consulting (see <b>Appendix F</b>. The detailed design of the podium and rooftop spaces will be subject to a further assessment process at DA stage, at which point there are appropriate measures which can be implemented at the DA stage. These measures could include but not be limited to the materiality and design of building façades, podium landscaping and wind mitigation devices integrated into the design of the communal open space areas. This is a common factor for all developments in Sydney that have a podium rooftop communal area, so it is not unique and the future built form can be easily designed to mitigate potential impacts.</p> <p>With regard to natural ventilation requirements, this is discussed below under Principal 6: Amenity.</p>
<b>Principle 4: Sustainability</b>	
<p>The majority of apartments shown by the concept scheme are single-aspect apartments. A large portion of these single-aspect apartments have an undesirable westerly orientation. It is evident that the proposal made little to no considerations regarding environmental sustainability as mechanical means such as air conditioning will be the dominant method of heating and cooling for the occupants of these single-aspect apartments, particularly those that have a westerly orientation. Furthermore, the concept scheme does not demonstrate adequate compliance with the minimum natural ventilation requirements of the ADG. This is further outlined in Principle 6: Amenity below. The future occupants will need to rely on the use of mechanical ventilation and HVAC systems, thereby generating excessive demands for energy consumption due to poor design of the building. No further assessment can be made as the Planning Proposal does not contain detailed information regarding proposed ESD mechanisms. Any future development application will need to complete the Environmental Sustainability Calculator in accordance with the considerations of Clause 6.11 Environmental sustainability of the Georges River LEP 2021.</p>	<p>The overall sustainability performance of the proposed development is intended to achieve the following criteria:</p> <ul style="list-style-type: none"> <li>• Supermarket: <ul style="list-style-type: none"> <li>- 5-star Green Star Interiors v1.3 rating (fit out).</li> <li>- Other opportunities such as in-store recycling, recycled PVC materials.</li> <li>- Provision of Electric Vehicle charging stations.</li> </ul> </li> <li>• Residential: <ul style="list-style-type: none"> <li>- BASIX Water target: Pass score (4), i.e. Water score 45 for residential.</li> </ul> </li> </ul>

	<p>- BASIX Energy target: Pass score (35), i.e. Energy score 40 for residential.</p> <p>These commitments are specified in the Public Benefit Offer provided to Council and will be subject to detailed assessment under a future DA applying to the site, including compliance with Clause 6.11 of the Georges River LEP 2021.</p> <p>With regard to the ADG natural ventilation requirements, this is discussed below under Principle 6: Amenity.</p>
<b>Principle 5: Landscape</b>	
<p><i>The location of the site on the periphery of the Ramsgate Centre presents an opportunity to provide a contiguous deep soil zone along the western boundary. While it is commendable that a 6m wide Green Link is proposed along the entirety of the boundary, the proposed Green Link cannot be recognised as a genuine deep soil zone in its current form. In accordance with the Apartment Design Guide, deep soil zones exclude impervious surfaces. The proposed Green Link is mostly hardscaped as a pathway for pedestrians and cyclists. The accompanying Landscape Plan shows a narrow strip of planting along the western site boundary and another narrow strip along the façade of building envelope. Therefore the hardscaped portions of the Green Link should be excluded from the calculation of the deep soil zones. Increased vegetation and landscaping should be provided on top of structures to supplement the reduced deep soil zones.</i></p>	<p>The revised reference scheme proposes to remove the through-site link along the western boundary, enabling this area to now be a deep soil landscaped setback area in accordance with the definition in the ADG.</p> <p>As the through-site link along the western boundary has been removed from the indicative reference scheme and replaced with additional deep soil planting, the total deep soil provided is now 579m<sup>2</sup>, which is 9.06% of the total site area and exceeds the minimum requirement.</p>
<b>Principle 6: Amenity</b>	
<p><i>As outlined above under Principle 3: Density, the amenity of the communal open space provided is significantly compromised by the unsafe wind conditions. The amenity impacts of the proposal on the neighbouring dwellings to the west and the amenity impacts of the proposed Green Link are outlined above under Principle 2: Built Form and Scale. In addition, significant concern is raised in relation to the calculation of the number of naturally cross ventilated units. The accompany Architectural and Urban Design Reports identify 92 out of 144 apartments as being naturally ventilated, equating to 63% of the development which appear to comply with the 60% ADG requirement. However, a total of 21 apartments in Building A and B (marked by blue dot below) rely on 'cross ventilation' via a narrow building indentation (see yellow highlight below) within the building envelope. Natural ventilation is defined by the ADG as allowing air to flow between positive pressure on the windward side of the building to the negative pressure on the leeward side of the building providing a greater degree of comfort and amenity for occupants. The building indentations are an extension of the separation space between Buildings A/B and therefore the indentations are unlikely to have a different air pressure when compared to the separation space. Existing apartment developments also demonstrate that the change in air pressure within these building indentation spaces there typically insufficient to facilitate genuine and effective natural ventilation. Therefore, it is considered that the concept scheme has 71 naturally cross ventilated apartments, equating to 49% which is non-compliant with the ADG. With the majority of proposed apartments (51%) without access to natural cross ventilation, the development will rely heavily on the use of mechanical ventilation and heating/cooling to ensure an acceptable level of amenity can be provided to its future occupants. The sustainability ramifications of a development with poor levels of natural ventilation are discussed above in Principle 4: Sustainability.</i></p>	<p>The indicative reference scheme has been amended by CHC to adjust the layouts of Buildings A and B as a result of removal of the 'indentations' previously used for cross ventilation purposes which Council identified as non-complaint. The new layouts across all residential levels satisfy ADG requirements for cross ventilation, with indicative reference scheme achieving 62.4%.</p>
<b>Principle 7: Safety</b>	

<p>Concern is raised regarding the usage and safety of the Green Link at the western boundaries of the subject site, as outlined above in Principle 2: Build Form and Scale. An assessment against CPTED principles must be provided for any future iterations of the Green Link.</p> <p>Concern is also raised regarding the safety of the new 'laneway' proposed at the eastern side boundary adjoining 201-209 Rocky Point Road. There is an absence of passive surveillance into this space and the re-configuration of the Building C apartments is recommended to re-orient the balconies of these apartments to face the new 'laneway'.</p>	<p>As noted above, the through-site link has been removed from the indicative reference scheme and replaced with a landscaped setback that is no longer accessible to the public.</p> <p>With regard to the access driveway at the eastern boundary adjoining 201-209 Rocky Point Road, this space benefits from passive surveillance from the west-facing balconies of the Roma apartments. Furthermore, the detailed design and orientation of the apartments in Building C will be subject to a future DA.</p>
<b>Principle 8: Housing diversity and social interaction</b>	
<p>It is noted that the subject Planning Proposal does not include any public benefit in terms of the provision of community facilities (i.e. the public plaza in previous planning proposals for the site). Previous concerns raised in Principle 3: Density regarding the lack of usable communal open space is repeated in this Principle to highlight the absence of social spaces to foster interaction among the residents. Additional communal spaces should be explored for inclusion within future iterations of the concept scheme. These may include flexible community rooms which can be used for a range of gathering and common activities like children's birthday parties or large craft projects, and social lobbies / circulation zones through the integration of lounge furniture, notice boards and artworks. The proponent is encouraged to reference the Healthy Higher Density Living for Families with Children Design Guide created by the Western Sydney Local Health District for best-practice principles in addressing housing diversity and social interaction within high density residential developments.</p>	<p>As the proposed design is for an indicative reference scheme only, there is potential for social or communal spaces to be integrated into the detailed internal design of the residential buildings. These details will be subject to a future DA.</p> <p>Notwithstanding this, the indicative reference scheme has been revised to include a potential enclosed communal room of approximately 50m<sup>2</sup> at the level 1 podium (refer to <b>Appendix A</b>, Sheet CP13). Additionally, the communal rooftop space at Building A has been increased to align with the proposed area at Building B, to provide equal amenity and more accurately reflect the number of apartments the communal spaces are serving.</p>
<b>Principle 9: Aesthetics</b>	
<p>The purpose of this Planning Proposal is to demonstrate the appropriate density (i.e. HOB and FSR) that can be accommodated on the site. Accordingly, no assessment has been conducted in relation to the material aesthetics of the concept scheme. Detailed assessment will be required as part of the development application stage in accordance with Clause 6.10 Design Excellence of the GRLEP 2021. Nonetheless, the concept scheme exhibits merit in the articulation and materiality and these should be retained at the detailed design stage.</p>	<p>A future DA for the site will provide details of the material aesthetics of the proposed development.</p>



## 3.6 Waste

The matters raised in Council's urban design internal referral are discussed in **Table 5** below.

**Table 5 Waste Referral**

Matter	Response
Waste Management Plan and Design	
a. The applicant has designed three separate residential towers with shared basement. Each tower could be considered in isolation when providing waste services. For the purpose of this report bin storage areas, bin allocations and waste disposal system have been specified for each tower separately.	<p>These comments are all noted and will be addressed at a future DA stage in the development process.</p> <p>The proposed reference scheme is capable of accommodating these requirements.</p> <p>Each tower has now been assigned waste rooms and bulky goods storerooms within the basements, as recommended.</p>
b. A single collection point for residential waste must be provided which is consistent with Council GRDCP2021 requirements for On-Property collection. Due to the large number of bins and limited street frontage the loading dock and turntable should be utilised for the servicing of bins and bulky waste from a single collection point.	
c. The use of 660L (as a minimum) or 1,100L bins are required for both the general waste and commingled recycling stream. 240L bins would be suitable for the organic waste stream. Current service frequencies would allow for a twice weekly general waste and recycling service.	
d. The applicant will need to consider and provide details by way of drawings for a suitable travel path from the individual tower bin storage area to the collection point.	
e. The applicant has proposed bin room which service each tower on the lower basement level, this location significantly increase the distance and resources required to move the bins to a single location for on-property servicing. The applicant should consider moving the bin room to ground floor or the upper basement floor as a minimum.	<p>Due to design constraints, it is not possible for the bin room to be relocated to the upper basement or ground floor.</p> <p>However, the scheme proposes a goods type lift which will connect the basement and podium levels, therefore allowing easy transfer of the 1100L bins.</p>
Bin Allocation – Waste Generation Rates	
f. Council's nominated generation rates for residential requirements in every development are: <ul style="list-style-type: none"><li>- 120L general waste per unit per week,</li><li>- 120L commingled recycling per unit per week,</li><li>- 96L organics per unit per week in Multi-Unit Dwellings (Section 4.4.1).</li></ul>	<p>These comments are all noted and will be addressed at a future DA stage in the development process.</p> <p>The proposed reference scheme is capable of accommodating these requirements.</p>
g. The on-property collection point must be of a suitable sized to hold all bin required for servicing. The current waste service allows for general waste and recycling to be serviced on the same day. To reduce the area required in the collection point Council may consider separate days for these services.	
h. Storage for paper and cardboard bins must be enabled at all developments with 50 or more units, at the ratio of at least 1 x 660L per bin for every 50 units. Council reserves the right to provide separate paper and cardboard bins, or commingled recycling bins, for the collection of unflattened cardboard boxes.	
Bulky Waste Storage	
i. When providing bulky waste storage, a tower specific or shared facility may be provided. All bulky waste material must be moved to the nominated on-property collection point for removal.	<p>These comments are all noted and will be addressed at a future DA stage in the development process.</p> <p>The proposed reference scheme is capable of accommodating these requirements.</p> <p>Each tower has now been assigned waste rooms and bulky goods store</p>
j. A lockable cage, designated screened area or, room in or attached to the bin storage area is to be dedicated for bulky waste (bulky clean-up materials such as couches, mattresses and furniture). The space should be appropriate with the minimum total space provided as follows: <ul style="list-style-type: none"><li>- Up to 20 units: a minimum of 4m2.</li></ul>	



<ul style="list-style-type: none"><li>- From 21 to 50 units: a minimum size of 10m<sup>2</sup>.</li><li>- From 51 to 100 units: a minimum size of 16m<sup>2</sup>.</li><li>- Over 100 units: a minimum of 16m<sup>2</sup> + 2m<sup>2</sup> per 50 additional units above 150 units (or part thereof).</li></ul>	within the basements, as recommended.
<p>k. Additional space must be provided for residential special waste streams such as electrical waste, polystyrene and textile waste in all developments of 20 or more units. A minimum area of 8m<sup>2</sup> is required for developments with 51 or more units. This space must be in or attached to the waste storage or bulky waste materials storage area and be accessible for all residents.</p>	
<b>Waste Disposal System and Chutes</b>	
<p>l. Dual chute system for general waste and recycling waste, using either rotating or linear tracks at the discharge point. This type of chute system is compulsory for buildings with six or more levels and must be used in towers 1 (A) and 2(B). In addition to the dual chute system the applicant must provide a bin storage area on each occupied floor, suitable for the storage of at least 2 days' worth of organic material at a ratio of 13.71 per unit, per day.</p>	<p>These comments are noted and will be addressed at a future DA stage in the development process.</p> <p>The proposed reference scheme is capable of accommodating these requirements.</p>
<p>m. The third tower 3(C) having less than 6 but more than 3 levels may utilise a single chute system, with a bin storage area on each occupied floor, suitable for the storage of at least 2 days' worth of recycled material at a ratio of 17.14 per unit, per day. In addition, the applicant must provide a bin storage area on each occupied floor, suitable for the storage of at least 2 days' worth of organic material at a ratio of 13.71 per unit, per day. In this case, mobile garbage bin(s) for recycling and organic materials are to be provided adjacent to the chute system (inlet).</p>	
<b>Commercial</b>	
<p>n. The applicant must detail the provision of commercial waste services including waste generation rates and proposed collection frequencies. The applicant must demonstrate how commercial waste and residential waste will be separated during storage and collection.</p>	<p>This comments is noted and will be addressed at a future DA stage in the development process.</p>

## 4.0 Transport for NSW Referral

The planning proposal was referred to Transport for NSW (TfNSW) on 13 March 2024, following which detailed comments were received on 15 April 2024. These comments related to the following matters:

- a. Rocky Point Road / Targo Road Intersection
  - 1. Warrants Assessment for Traffic Signals
  - 2. Safety at the Intersection
  - 3. Distance to Existing Signals:
- b. The Promenade/Ramsgate Road/Targo Road Intersection
  - 4. Loss of Parking
  - 5. Loading Dock / Access Driveway
  - 6. General

A comprehensive response to each of the matters raised by TfNSW is provided by CBRK in **Appendix D**.