

6 June 2025  
Kiersten Fishburn  
Secretary  
Department of Planning and Environment  
12 Darcy Street  
Parramatta NSW 2150

Dear Ms Fishburn,

**REZONING REVIEW REQUEST – PLANNING PROPOSAL PP2024/0001  
193-199 ROCKY POINT ROAD, 66-68 RAMSGATE ROAD AND 2-4 TARGO ROAD, RAMSGATE**

On behalf of our client and the Proponent, Fabcot Pty Ltd (Woolworths), we hereby seek a Rezoning Review in relation to Planning Proposal (PP2024/0001) lodged with Georges River Council (Council) for land located at 193-199 Rocky Point Road, 66-68 Ramsgate Road and 2-4 Targo Road, Ramsgate (the site).

This Rezoning Review Request is submitted on the basis that Council has failed to indicate their endorsed position for the Planning Proposal within 90 days.

Initially, Council's Strategic Planning Team and Council's Independent Assessor – GYDE Assessment report expressed support for the proposed rezoning, and the Planning Proposal was subsequently reported to the Georges River Local Planning Panel (LPP) on 5 December 2024 with a recommendation to proceed.

Since the LPP meeting, the Proponent provided additional information in relation to traffic and transport to resolve outstanding matters, upon review of the additional information, Council's Strategic Planning Team and GYDE in a letter dated 19 March 2025, advised:

*"despite the planning proposal demonstrating strategic merit and site-specific merit for all other matters, except for those relating to traffic and parking, the Planning Proposal's potential adverse impact to the surrounding state and local road networks as identified by TfNSW and Council cannot be supported".*

Following the Council letter a meeting with Council, the Proponent and TfNSW was held on 15 April 2025 where the traffic matters were reviewed. It is the Proponent's understanding that the outcome from that meeting was that all traffic matters were resolved or capable of being resolved.

While there has been no formal resolution of the Planning Proposal, Council has recently informally notified the Proponent via email dated 12 May 2025, that it will not be supporting the Planning Proposal to proceed to Gateway Determination. The Proponent understands the Planning Proposal is scheduled to be reported to the Environmental Planning Committee Meeting on 10 June 2025, with the Planning Proposal to be considered at the following Council meeting scheduled for 24 June 2025.

The Planning Proposal (PP-2024-0001) was originally lodged with Council on 20 December 2023 following significant engagement with both the Community and Council. Woolworths has significantly revised its proposal based on community feedback, aiming to create a design that better complements the local area. This is reinforced through significant support from the local business community.

Key changes include:

- **Apartments:** The number of proposed apartments has been reduced from approximately 176 to 144, split across three buildings. This adjustment addresses concerns about the scale of the residential component.
- **Parking:** The proposed car spaces have been almost halved, decreasing from around 668 to 348 across two basement levels. This change directly responds to community traffic concerns and has received support from the local business community.
- **Retail Space:** The dedicated retail floor area has been halved from approximately 8,000sqm to just over 4,000sqm. This means the site will now only feature a supermarket and liquor store, with the intention of embedding with and supporting the existing business community and reducing traffic impacts.

- **Built Form:** The design has been updated to better blend with the surrounding environment, with varying streetscapes on all four sides. This includes an activated retail ground floor on the east and a green public walkway on the western boundary, along with larger setbacks for enhanced privacy.
- **Traffic Management:** Collaborating with traffic specialists, the updated plans incorporate measures to improve traffic flow, including the addition of traffic lights at the corners of Rocky Point Road and Targo Road, and Targo Road and Ramsgate Road. Crucially, trucks will now enter and exit from Ramsgate Road, redirecting heavy vehicle traffic away from residential streets.

The Planning Proposal was prepared to directly respond to the key matters raised by the South Sydney Planning Panel (SSPP) in August 2022 on the previous planning proposal (PP-2021-6179). Specifically, the current Planning Proposal scheme has addressed the SSPP's previous queries by significantly reducing the gross floor area, providing greater podium and upper level setback and undertaking detailed traffic analysis. The Planning Proposal was subject to amendment during the assessment process, prior to being considered by the Georges River LPP. The only outstanding matters related to the Planning Proposal that we request review by the SSPP are as follows:

- **Proposed Part 6 – Additional Local Provision:** Council have opposed the proposed provision, however this untenable for the Proponent as it is considered essential to achieving the objectives and intended outcomes of the Planning Proposal whilst also providing greater certainty and transparency to the community with regard to the intended future built form outcome (refer to **Section 2.3** for further detail).
- **Identified traffic issues** by TfNSW and Council's traffic team, related to the restriction of right hand turn from existing driveway at 272 Rocky Point Road, Ramsgate, loss of parking along the western side of Rocky Point Road, and potentially for 'rat-running' along Targo Road. The Proponent has continued to consult with both TfNSW and Council regarding these matters and **Section 3.1** of this letter outlines the proposed pathway to resolve these matters and should not prevent the Planning Proposal from progressing.

The Planning Proposal seeks to amend the Georges River Local Environmental Plan 2021 (GRLEP) to achieve a vibrant mixed-use redevelopment outcome, including a major full-line supermarket and well-located in-fill housing in a suitable urban form that supports a considered transition to the surrounding residential interface. The specific amendments to the GRLEP 2021 that is sought through the Planning Proposal are:

- Rezone a portion of the site from R4 High Density Residential to E1 Local Centre;
- Increasing the building height standard on the site from part 15 metres and part 21 metres to part 16m and part 29m;
- Increase the maximum floor space ratio (FSR) standard from part 2.5:1 and part 1.5:1 to 2.7:1;
- Introduce a new site-specific provision under Part 6 Additional local provisions of the GRLEP 2021 relating to exceptions to the maximum permitted height for the site to allow greater flexibility for future development to incorporate roof top plant, lift overruns and communal open space, whilst maintaining a lower LEP height limit that effectively limits the building parapet height.
- Reclassify Council owned Lot 301 DP 1142822 (76.1m<sup>2</sup>) from 'community land' to 'operational land' to enable future acquisition by Fabcot Pty Ltd and eventual redevelopment of the land, and insert details for the land into 'Schedule 4 Classification and reclassification of public land'.
- Site-specific amendments to the Georges River Development Control Plan 2021 (GRDCP 2021) are also proposed to support the Planning Proposal and the proposed future redevelopment. These amendments will address key design and development outcomes, including bulk, scale and massing, building design, activation, access, landscaping, residential amenity and sustainability.

To assist the Panel in its consideration of the Planning Proposal please find attached to this letter:

- A copy of the Planning Proposal, including all supporting documentation, as was originally submitted to Council on 20 December 2023 (**Attachment A**);
- A copy of the Proponent's Response to Council's Request for Further Information dated 31 May 2024 (**Attachment B**);
- A copy of the Council officer/ Independent Assessor's planning assessment report as submitted to the Georges River Local Planning Panel, dated 5 December 2024 (**Attachment C**);
- A copy of the Georges River Local Planning Panel's resolution minutes, dated 5 December 2024 (**Attachment D**);
- A copy of the Council letter formally notifying the change in decision on the Planning Proposal, dated 19 March 2025 (**Attachment E**);

- A copy of the Transport for NSW submission and feedback on the additional information provided in relation to Traffic and Transport, dated 28 February 2025, Proponent’s response and meeting minutes held on 15 April 2025 (**Attachment F**);
- A copy of Letters of Support from the local community and Business Chamber South (**Attachment G**);
- Overshadowing analysis comparing the Planning Proposal Scheme with the GYDE recommended approach to building height, prepared by CHC (**Attachment H**);
- A summary of community consultation feedback (**Attachment I**); and
- Independent Transport Review prepared by JMT Consulting (**Attachment J**).

## 1.0 Site Overview

The site is located at 193-199 Rocky Point Road, 66-68 Ramsgate Road and 2-4 Targo Road, Ramsgate. It is located within the Georges River Local Government Area (LGA). The site is on the eastern edge of the LGA being west of Rocky Point Road, with areas east of Rocky Point Road being within the Bayside LGA. Parts of the site (including 66 Ramsgate Road and 4 Targo Road) are located across the suburb boundary in Beverley Park.

Ramsgate is located 16km south of the Sydney Central Business District (CBD) and 5km south-west of Sydney Airport. It is between Botany Bay (1.1km to the east of the site) and Kogarah Bay (400m to the southwest of the site), near the mouth of the Georges River. Ramsgate is surrounded by the suburbs of Beverley Park, Monterey, Ramsgate Beach, Kogarah, Dolls Point and Sans Souci.

The legal description of the lots on the site are summarised in **Table 1**.

**Table 1** Site address, legal description and ownership

Address	Lot and DP	Area (m²)	Ownership
193 Rocky Point Road	Lot 8 DP 653883	695.5	Fabcot Pty Ltd
	Lot A DP 311887	347.7	Fabcot Pty Ltd
	Lot B DP 311887	347.7	Fabcot Pty Ltd
197 Rocky Point Road	SP 83814	620.37	Fabcot Pty Ltd
	Lot 301 DP 1142822	76.1	Georges River Council
199 Rocky Point Road	SP 77494	927.2	Fabcot Pty Ltd
66 Ramsgate Road	Lot B DP 371250	841.0	Fabcot Pty Ltd
68 Ramsgate Road	Lot 12 DP 455810	232.0	Fabcot Pty Ltd
	Lot 13 DP 455810	231.0	Fabcot Pty Ltd
	Lot 14 DP 455810	231.0	Fabcot Pty Ltd
2 Targo Road	Lot 1 DP 1338117	233.9	Fabcot Pty Ltd
	Lot 2 DP 1338117	233.9	Fabcot Pty Ltd
	Lot 1 DP 970582	227.6	Fabcot Pty Ltd
4 Targo Road	Lot B DP 347589	1,132.0	Fabcot Pty Ltd

As shown in the table above, the site comprises a total of 14 individual lots. Except for Lot 301 DP 114822 which is a landlocked Council owned parcel of 76m² with no road frontage, the Proponent has consolidated the lots under various option agreements for the purposes of this Planning Proposal.

With regard to Lot 301 DP 114822, this is Council owned land that is classified as “community land” under the Local Government Act 1993 (LG Act). As part of the Planning Proposal and further addressed in detail in **Section 4.1**, it is proposed to reclassify this land as “operational” land to enable it to be purchased by the Proponent for redevelopment.

The site has an area of approximately 6,376.27m² and comprises three street frontages of:

- 60m to Rocky Point Road;
- 82.5m to Targo Road; and
- 30m to Ramsgate Road.

The site is generally flat with a very slight decline running from west to east. An aerial photo of the site is shown at **Figure 1**.



 Site Boundaries



**Figure 1** Site Aerial Map

Source: Nearmap/ Ethos Urban

## 1.1 Need for the Planning Proposal

- Ramsgate Town Centre is currently underutilised with the retail along Rocky Point Road suffering and in desperate need of redevelopment. The Planning Proposal presents the opportunity for Ramsgate local centre to become anchored by the site's proposed retail provision to support the immediate urban catchment and complement other retailers in Ramsgate. This has been reiterated in the Business Chamber's letter of support for the proposal (**Attachment G**).
- Greater Sydney is currently facing a significant housing supply issue, the Planning Proposal will deliver an additional 141 dwellings within a local centre that is well-served by public transport and will support a proportion of the anticipated population growth in the Georges River LGA.
- Broader renewal benefits – the Planning Proposal will become a catalyst for further investment in the Ramsgate Centre and elevate its status from "Village" to 'Local Centre'.
- There is a significant undersupply of supermarket floor space in Ramsgate, approximately 30% below the typical supermarket provision in Greater Sydney. It was revealed due to lack of large supermarkets in the area, residents rely heavily on stores located outside of Ramsgate and more than 3km away. The Economic Study and Retail Study prepared by Ethos Urban (within **Attachment A**) confirms the delivery of a new full-line supermarket that will directly address a substantial undersupply of full-line supermarket floorspace within the local area, and will assist in satisfying the retail needs of the growing population within Ramsgate and the surrounding area. It was noted the new supermarket will create some temporary short-term impacts on surrounding supermarkets, however these will be offset after the first year by localised growth expenditure, which will see all existing supermarkets return back to increased revenue in the short to medium term. The impact is therefore considered short-term, minor and acceptable.

## 2.0 Background and History

The site has been earmarked for redevelopment for more than a decade, and has been the subject of previous Planning Proposals put forward by former landowners and the Proponent in a Joint Venture with Australian developer Time and Place. The site's planning history is set out in the revised Planning Proposal at **Attachment A** and summarised below.

### 2.1 Planning Proposal – December 2023

The Planning Proposal, the subject of this Rezoning Review Request represents an evolution from the previous scheme, by maintaining the same strategic merit and positive qualities that were highlighted by the SSPP in August 2022. However, this Planning Proposal and the revised indicative reference scheme have made a number of key design improvements and moves to address the site-specific matters raised in the assessment and directly respond to Council's concerns on the previous scheme. The key design improvements include:

- Removal of the public square and relocation of the proposed supermarket from its previous subterranean location to the ground floor.
- Reduced overall bulk as a result of introducing greater podium setbacks to external neighbours and the streetscape. The reduced bulk and scale is reflected in the lower FSR proposed for the site – 2.64:1, which is 0.96 less than the previous scheme's FSR (3.6:1).
- Reduced street wall heights/ podium are proposed under the current scheme. The previous scheme had podiums ranging between 4 to 7 storeys. The current scheme proposes a single storey retail podium equivalent to 6m in height
- The previous scheme proposed a 3m setback from the western boundary, resulting in a poor interface to neighbouring low-density residential property and no provision for deep soil planting. The current scheme has directly responded to feedback on the previous scheme and has adopted a 6m setback along the western boundary. The 6m setback is proposed to accommodate a landscaped green corridor which allows for 9.06% of deep soil planting, passive privacy and screening through the west of the site connecting Targo to Ramsgate Road.
- The previous scheme proposed minimal setbacks to the upper levels above the podium, resulting in the appearance of the residential levels towering over neighbours from the street interface. The current scheme proposes a 5m street setback to the residential levels above the podium and a further setback from the neighbouring heritage items located to the south of the site along the Ramsgate Road interface.
- The previous scheme provided a poor interface and transition between the proposed Building C and the adjacent heritage 'Roma' apartments at 70 Ramsgate Road, as a result of the proposed height of 6-storeys and insufficient building separation provided by the proposed 3m setback. The current scheme has reduced the proposed Building C to 4 storeys and provides 6m setback from Ramsgate Road and required 6m laneway to the back of the heritage interface.
- Detailed traffic analysis has been undertaken to respond to the SSPP's comments in collaboration with TfNSW and Council's traffic team. Specific amendments to improve the traffic outcomes of the current scheme when compared with the previous scheme include:
  - Installation of new signal at the Targo Road and Rocky Point Road intersection to provide capacity for right turns out of Targo Road.
  - 21% reduction in the number of car parking spaces to service the residents and proposed supermarket due to the number of apartments decreasing, attributing to a 21% reduction in traffic congestion impacts on the surrounding road network.

### 2.2 Revisions to the Planning Proposal – May 2024

The Planning Proposal was revised on 31 May 2024 to respond to concerns raised by GYDE (the independent assessor) and Council internal referrals during the initial assessment period. 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. A copy of the responses is provided at **Attachment B**.

Key amendments to the proposed design and matters that have been addressed in detail within the revised Planning Proposal include:

- Removal of through-site link along the western boundary and replacement with a deep soil landscaped setback to help facilitate a vegetated interface with residential properties to the west.
- Introduction of three activity nodes to provide greater public benefit as a result of removal of through-site link.

- Additional 1m setback along Rocky Point Road frontage to allow a wider footpath to enhance pedestrian movement.
- Reduction of potential vehicle and pedestrian conflict on Targo Road through shifting the residential lobby entry 5m further east to provide ample separation and minimise potential conflicts between residents and vehicles entering and exiting the site.
- Further design amendments to Building C to provide a sympathetic heritage response including additional splaying to allow greater visual connectivity from the west along Ramsgate Road to the neighbouring heritage building and information on future measures to minimise amenity impacts.
- Additional basement parking level to comply with the Georges River DCP parking requirements.
- Increased building separation between Building B and No.6 Targo Road by shifting the western façade of Building B further east, at Level 1 the façade line has shifted from 8m to 11m from the boundary and from 9m to 11m at levels 2-4.
- Due to the increased building separation, the total number of proposed apartments has decreased from 144 to 141, however access to natural light for the proposed apartments and communal open space has improved as has the interface with neighbouring properties.
- Minor amendments have been made to the proposed waste storage areas to provide an optimised outcome, refer to Planning Proposal Package at **Attachment A**.
- Further justification and modelling in relation to projected traffic impacts.

## 2.3 Response to Local Planning Panel Comments – December 2024

Following assessment by GYDE and positive recommendation to proceed, the Planning Proposal was reported to the Georges River Local Planning Panel (the Panel) at their meeting of 5 December 2024. The Proponent has reviewed the LPP's recommendations and welcome the Council's support for the Planning Proposal. Whilst this is the case there is one matter the Proponent requests the South Sydney Planning Panel to consider as part of this rezoning review, this being the recommended removal of the proposed site-specific provision relating to exceptions to the maximum building height. The LPP's recommendations and a summary response is provided as follows.

**The LPP advised Council that the amendments to the planning controls as envisaged in the Planning Directors report presented to the Panel, have strategic merit.**

**Response:** The Proponent welcomes and supports the LPP's recommendation that the proposed amendments to the planning have strategic merit.

***The Panel recommended Council support the proposed amendments to Georges River Local Environmental Plan 2021 (GRLEP), as follows:***

- (a) Rezone the land from part R4 High Density Residential and part E1 Local Centre to E1 Local Centre.***
- (b) Increase the building height from part 15 metres (R4 zone) and part 21 metres (E1 zone) to part 16m and part 29m.***
- (c) Increase the Floor Space Ratio (FSR) from part 2.5:1 (E1 zone) and part 1.5:1 (R4 zone) to 2.64:1.***
- (d) Reclassify Council-owned Lot 301 DP 114822 from 'community land' under the LGA Act to 'operational land' to enable future acquisition from Council and eventual redevelopment of the land. These details are proposed to be inserted into 'Schedule 4 Classification and reclassification of public land' of the GRLEP 2021.***

**Response:** As above, the Proponent welcomes and supports the LPP's recommendation with regard to the proposed amendments to the GRLEP as set out above.

***The Panel recommends that:***

- (a) Prior to Council determining to proceed to Gateway:***
  - (i) The Planning Proposal:***
    - a) Impose a maximum FSR of 2.64:1***

**Response:** The Proponent agrees with the Panel's recommendation and can reduce the proposed maximum FSR of 2.7:1 to 2.64:1 prior to Public Exhibition, subject to the Planning Proposal receiving Gateway Determination. This can be easily updated in response to the Rezoning Review process.

- b) **Delete the Part 6 Additional local provision setting out exceptions to the maximum building height to allow flexibility for future development to provide roof top communal open space and associated built form elements, including lifts, lift overruns, lift lobbies, plant and services at the site.**

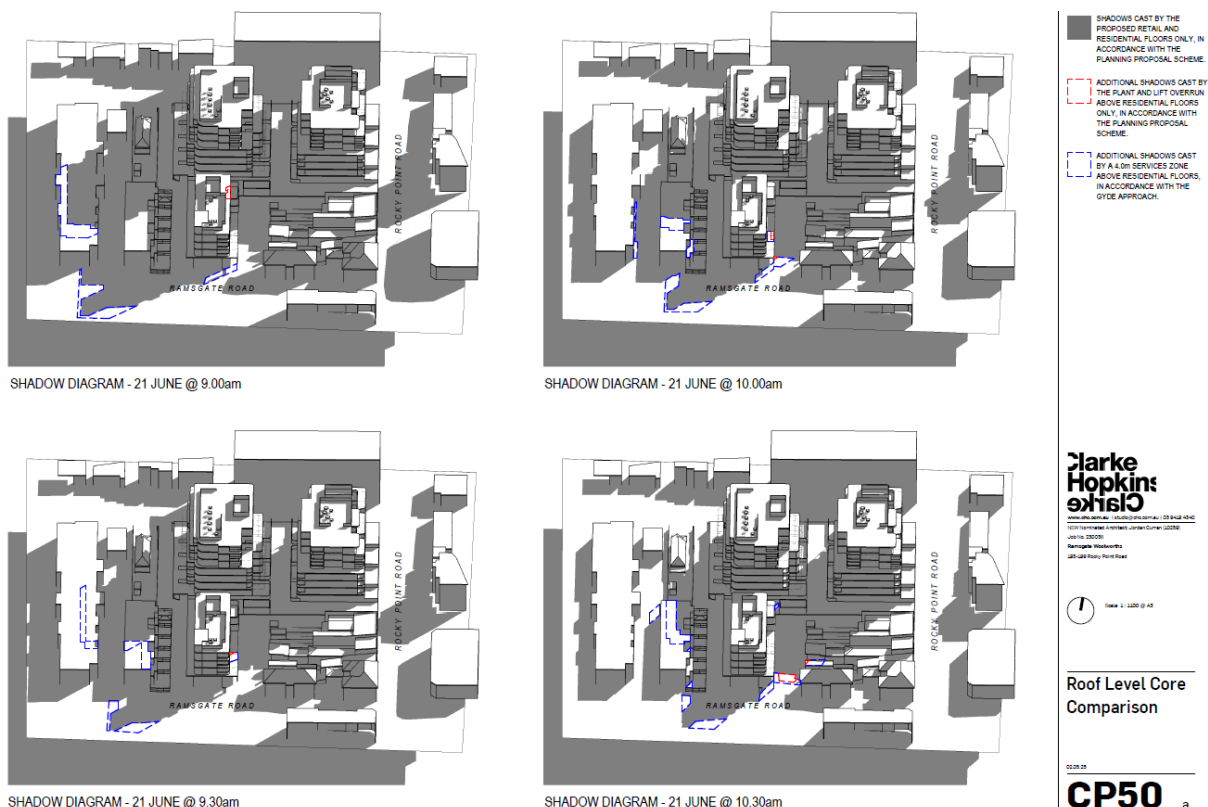
**Response:** As noted, the Proponent does not support the LPP's recommendation and independent assessor's request to remove the proposed Part 6 Additional local provision which allow exceptions to the proposed part 16m and part 29m maximum building heights for the purpose of rooftop communal open space and associated built form elements including lift lobbies, plant and lift overruns.

The Proponent requests the South Sydney Planning Panel to review the proposed Part 6 Additional Local Provision and consider its merits and potential to create a better outcome than GYDE's approach of utilising Clause 4.6 or capturing the height exceptions within the overall building height, as outlined below.

it is important to note that the additional that would be enabled under the Additional Local Provision will not permit an additional residential floor. This will be assured, as the draft wording of the provision explicitly states the additional height must be used for the specified purpose of rooftop communal space and associated plant and services. The Proponent believes this approach will provide a better outcome compared to approach suggested by the independent assessor of utilising Clause 4.6 or capturing the height exceptions in an increased overall building height.

While Clause 4.6 is a useful mechanism available to justify variations to development standards, the Proponent has concerns that by deferring the height exceptions for the proposed rooftop communal open space, lift overruns and plant to a future DA, there is no certainty the variation to the amended LEP building height will be accepted by Council. Additionally, leaving the solution to a future Clause 4.6 instils a lack of transparency and adds confusion for the community, resulting in a further lack of community trust in the planning process.

The alternate approach of capturing the height exceptions with an increased overall building height adds another layer of uncertainty and is even less transparent for the community. Importantly, we note that simply increasing the maximum building height would not prevent the Proponent from attempting to include an additional residential floor in a future DA. Additionally, CHC have undertaken an overshadowing study which clearly illustrates that an increased maximum building height to account for future rooftop plant and lift overruns has a greater amenity impact on the surrounding residential properties. An extract of the additional overshadowing impact generated by the increase in maximum height is provided at **Figure 2**.



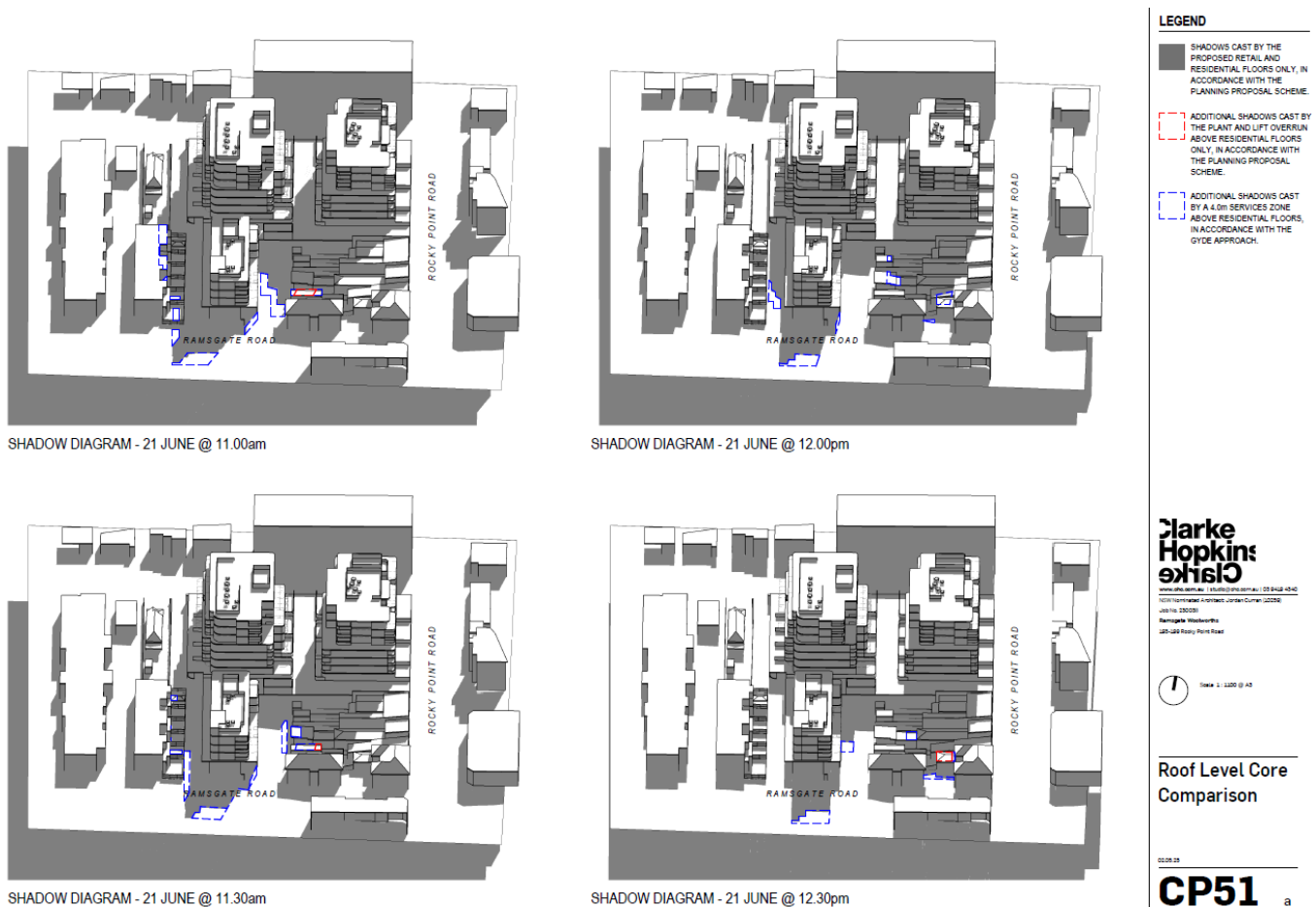
**Figure 2** Extract of overshadowing study comparison – 9:00am to 10:30am

Source: CHC

**Figure 2** shows between 9:00am and 10:30am the increase maximum height (shown in blue outline) has a much greater impact on the residential properties at No.6 and No.8 Targo Road, when compared with the Planning Proposal scheme (shown in red outline) which provides additional shadow on the proposed development and service lane. By comparison, the approach proposed within the Planning Proposal to include an Additional Local Provision represents a much better solution for all stakeholders as:

- it provides greater certainty and transparency the community, the proponent and Council, by setting clear expectations on both the intended design outcome for the site and the planning process.
- It reduces the primary LEP height limit to part 16m and part 29m, ensuring that the maximum number of residential storeys is as set out in the Planning Proposal. This represents a reduction from the previous planning proposal on the site (PP-2021-6179), which sought maximum building heights of over 30m.
- It prevents any ability for the future proposal to achieve an additional residential storey, which could theoretically occur under the suggestion of having a higher LEP height limit to account for the rooftop plant and communal facilities.
- It locks in clear controls and parameter about what can occur on the rooftop, and is clear in preventing further residential GFA.
- it supports the achievement of greater amenity for future residents which is critical for ensuring compliance with the 25% communal open space Apartment Design Guide requirement.

In addition to the above, the revised reference scheme and further overshadowing analysis prepared by CHC confirms that the additional height provided for rooftop communal open space, plant and services does not generate any additional adverse overshadowing impacts that would hinder surrounding development's compliance with ADG. Additional shadows generated by the proposed plant and lift overruns are minor as the shadows are cast to the proposed development, service lane, roads and rooves of commercial properties and garage of the adjoining Roma apartments. An extract of the additional shadows generated by the proposed plant and lift overruns (outlined in red) at 11:00am to 12:30pm are shown in **Figure 3**.



**Figure 3** Extract of additional overshadowing generated by proposed plant and lift overrun (outlined in red) – 11:00am to 12:30pm

Source: CHC

We note key reasons for independent assessor and the LPP's request to remove the proposed Additional Local Provision is due to the provision being inconsistent with the GRLEP 2021 definition of building height and lack of precedent examples within the GRLEP 2021. While there are no relevant precedents in the GRLEP 2021, there are precedents of similar height exception clauses across other NSW LEPs and SEPPs, which include:

- Clause 4.3A of the *North Sydney LEP 2013*, which allows certain areas to exceed the maximum height by 2-5m if the part of the building that exceeds the maximum height limit comprises lift overruns and associated structures necessary to provide lift access to communal rooftop space, balustrades or other safety barriers, and rooftop plant or equipment.
- Schedule 3, Part 3, Section 21 of *State Environmental Planning Policy (Precincts- Eastern Harbour City) 2021* allows one area within the Redfern Waterloo sites to exceed the maximum height by 1m if used for rooftop plant or equipment; has minimal visual impact; and does not increase the GFA of the building.
- Proposed new clause in Part 5 Miscellaneous Provisions of the *Sydney LEP 2012* (PP-2024-709 currently under exhibition), which seeks to allow buildings outside Central Sydney to exceed the building height if it includes structures that provide access to green roofs and rooftop communal open space to support the social use of the roof space; has minimal impacts; does not include GFA; and is compatible with the scale of the future character of the precinct.

Following the LPP's recommendation, the Proponent has reviewed the Additional Local Provision and proposed some minor amendments to the wording of the draft provision, including nominating a maximum additional height of up to 4m and clarifying the additional overshadowing provision to align with requirements of the ADG. The suggested update to the additional local provision is set out in **Section 4.1.4**.

- (i) **Council and TfNSW to be satisfied regarding traffic and transport issues, including but not limited to the following:**
- The state and local road network, within an area of minimum of 800m radius of the site, can perform satisfactorily.**
  - The operation of the proposed signalised junction at Rocky Point Road and Targo Road can achieve a satisfactory level of service for motor vehicles and pedestrians at all times.**
  - The operation of the existing signalised junction at Rocky Point Road and Ramsgate Road can achieve a satisfactory level of service for motor vehicles and pedestrians at all times.**
  - Any impacts on existing bus stops and potential need for their relocation,**
  - The egress and ingress for the loading dock accessed from Ramsgate Road.**

**Response:** A revised Traffic Impact Assessment has been prepared by CBRK (refer to **Attachment A**) and addresses matters raised by Council and TfNSW. Specifically, the revised Traffic Impact Assessment and updated SIDRA modelling concludes:

- With the identified road upgrades the road network within 800m of the site will be able to cater for the traffic generated by the proposed development and will still perform satisfactorily.
- The proposed signalised junction of Rocky Point Road and Targo Road will operate at a satisfactory or better level of service with the traffic generated from the proposed development in place. With parking on the eastern side of Rocky Point Road banned for some 50m north of Targo Road, the right turn movement would not block southbound through traffic. It is noted further consultation will be undertaken regarding the loss of on street parking should the Planning Proposal go on exhibition, noting all parking lost, will be replaced within the proposed development;
- The signalised intersection of Rocky Point Road and Ramsgate Road will continue to operate with average delays of less than 35 seconds per vehicle during weekday afternoon and Saturday midday peak periods. This represents level of service C, a satisfactory level of service;
- As part of the proposed traffic signals, the bus stops on both sides of Ramsgate Road, either side of the intersection of Targo Road, and the bus stop located on the western side of Rocky Point Road (north of the existing pedestrian signals) may need to be relocated. The possible relocation of these bus stops would be undertaken in consultation with TfNSW, Council and the bus operators as part of a future DA.
- TfNSW/Council requested that the loading dock access be modified so that trucks turning left off Ramsgate Road do so only from the kerb side lane (no straddling of the kerb and adjacent lane while turning). Updated swept paths show trucks turning left off Ramsgate Road as required by Council (refer to **Attachment A**).

- (ii) **The lodgement of a VPA offer to address the public benefits. The VPA should include any road works and facilities required to address the impacts of the proposal. Discussions to occur with Council officers before the lodgement of the revised offer.**

**Response:** A meeting was held with Council on 5 March 2025 to progress discussions regarding the VPA. These discussions have been positive and are moving forward, we therefore expect that the VPA will be resolved in parallel to the Planning Proposal. Following the meeting, the Proponent has paid the fee for preliminary assessment of the VPA. It is understood, Council will commence a valuation process of the VPA to facilitate further discussions.

**(b) Prior to Community Consultation if Gateway issued:**

**(i) The Planning Agreement to be executed by the owner.**

**(ii) Amend the Site Specific DCP to:**

**a) Include urban design principles and provisions, which seek to:**

**a. Protect the amenity and privacy of residents, including adequate separation of commercial activity and residential uses, and appropriate interface treatment to neighbours.**

**b. Enhance activation of the Rocky Point Road retail frontage.**

**c. Improve pedestrian amenity and safety on all street frontages.**

**b) Include all proposed ground level setbacks in the written controls and relevant setback diagrams and section drawings.**

**c) Delete the existing control for a through-site link and replace with a new provision of publicly accessible open space that will:**

**a. Complement and connect with ground floor commercial uses,**

**b. Not disrupt the amenity of neighbouring residential properties,**

**c. Provide safe zones for refuge and improve public amenity.**

**d) Delete all residential, pedestrian and vehicular access point, except for the proposed 6m wide loading access adjacent to the existing 3.66m ROW at the rear of No. 201-209 Rocky Point Road from Ramsgate Road and supermarket main entry at the north-eastern portion of the site. All other site access points may be determined as part of a future DA and should not be included in the Site Specific DCP.**

**e) Include vehicular access objectives and provisions that ensure vehicular access points minimise potential conflicts with pedestrians and minimise the disruption of the surrounding local road network.**

**f) Include provisions to enable easement access agreement for shared vehicular access from 6m Ramsgate Road driveway to accommodate MRVs required for back of house functions or Council's garbage collection vehicles for the future development of No. 201-209 Rocky Point Road.**

**g) Include a requirement for a future DA to prepare a Plan of Management for the management of the loading dock area between commercial and residential uses, and any controls to form part of the strata plan for the future development.**

**h) Include objectives and provisions to protect the amenity of the adjacent heritage item known as 'Roma'. This includes controls that:**

**a. Address the acoustic and visual impacts and amenity of the loading dock/ delivery area.**

**b. Ensure a high-quality architectural expression and palette of materials and finishes to the façade to the utilities area.**

**(iii) Update all other PP supporting documents, including the Traffic and Transport Assessment, to resolve outstanding matters or inconsistencies before public exhibition.**

**Response:** The Proponent concurs with the Panel's recommendation that the Site Specific DCP is to be updated prior to public exhibition if a Gateway Determination is issued. Similarly, all other supporting documentation as part of the Planning Proposal will be updated to resolve outstanding matter or inconsistencies prior to public exhibition.

**(c) During community consultation**

**(i) Undertake all the required statutory requirements and consultation for the reclassification of Council-owned Lot 301 DP 114822 from 'community land' under the Local Government Act to 'operational land' as a Condition of Gateway.**

**(ii) Undertake consultation with relevant State agencies, including TfNSW particularly regarding all proposed road network upgrades to be included in the VPA request lodged by the Proponent and conditioned for any future development consent.**

**(iii) Undertake consultation with Bayside Council and the community in regard to the removal of parking spaces on the eastern side of Rocky Point Road/ Targo Road.**

**(iv) Publicly exhibit the PP, including draft site-specific DCP and draft planning agreement, for a minimum of 28 days (unless an alternate period is prescribed in the Gateway Determination)**

**Response:** The Proponent agree with the Panel's recommendations that the above be undertaken during public exhibition of the Planning Proposal.

## 2.4 Further Correspondence from Council – Change in decision to no longer support

Following the LPP meeting, the Proponent has continued to work through outstanding traffic matters raised in the LPP and provided Council the following additional information:

- A revised Traffic Impact Assessment (January 2025);
- Electronic copy of updated SIDRA Network modelling; and
- Response to Transport for NSW' (TfNSW) comments in Annexure B of letter dated 17 October 2024.

Upon review of the information and feedback from TfNSW in a submission (**Attachment F**), Council's Strategic Planning Team and GYDE' Consulting informed the Proponent in a letter dated 19 March 2025 (**Attachment E**) that they no longer supported the Planning Proposal and would rescind their recommendation for it to proceed to Gateway due to the following reasons:

- The Planning does not demonstrate site-specific merit as the proposal will result in unresolved traffic impacts on the surrounding road network, including an unacceptable LoS for Rocky Point Road/Ramsgate Road and Rocky Point Road/Targo Road intersections, loss of on-street parking with potential adverse impacts on local business, and potential amenity impacts on Targo Road from increased traffic volumes.
- The traffic concerns raised by TfNSW in its letter dated 28 February 2025 and, in the comments, received from Council's Traffic Engineers 11 March 2025, which confirms that Council and TfNSW are not satisfied regarding traffic and transport issues. As such the PP has not adequately addressed the LPP's recommendations regarding the unresolved traffic and transport issues.

Accordingly, despite the Planning Proposal demonstrating both strategic merit and site-specific merit for all other matters, the potential for adverse impacts on the surrounding state and local road network has been identified as the sole outstanding reason why the Council is unable to support the Planning Proposal proceeding to Gateway. We discuss this in further detail below.

## 3.0 Traffic

The Proponent met with Council and TfNSW on 15 April 2024 to discuss the outstanding traffic items and demonstrate how the items are resolvable to ensure the Planning Proposal can proceed. As a result of this meeting, TfNSW and Council's Traffic Engineers were satisfied that the majority of the traffic matters are now considered resolved and/or there is a clear pathway towards resolution. However, there are three outstanding traffic matters that have been verbally advised are an issue for Council only (not TfNSW).

Since meeting with TfNSW and Council, the Proponent has been actively working with the Project's traffic team and can confirm all matters identified above have been resolved, and this additional information was provided to Council's Strategic Planning Staff via email dated 3 June 2025

The resolution and pathway towards resolution for each of the traffic matters are summarised below in **Table 1** with further detail provided in the Independent Transport Review prepared by JMT Consulting provided at **Attachment I**. It is noted that the proposed approach to resolving these outstanding matters has been issued to TfNSW and Council for feedback, however no further comments have been received.

In reviewing the items contained in **Table 1** it's important to highlight that each of the outstanding traffic matters have been resolved and/or are resolvable and are not threshold matters that should prevent the Planning Proposal from progressing to Gateway.

**Table 1 Outstanding Traffic Items**

Item	Matter	Proponent Response
TfNSW Item 4	Unacceptable impact to the existing driveway on eastern side of Rocky Point Road at 272 Rocky Point Road (Bayside Council) to formally make this driveway a left in left out access point, noting TfNSW would otherwise not support the proposed	The Proponent has engaged in discussions with the landowner of the private property at 272 Rocky Point Road to seek agreement to make their existing driveway left-in-left out. The landowner has provided verbal agreement for the driveway to be made left-in-left out only, with written

	new signals and “No Right Turn” restrictions during AM and PM peak at the intersection of Rocky Point Road/Targo Road.	agreement to be provided to the Proponent imminently. The subject right turn is into a private property and is unsafe and rarely used. Additionally, Bayside Council has a strategy to remove these existing driveways from Rocky Point Road through the provision of a service lane to the rear of this property. This will be a condition of consent for any future Development Applications. TfNSW could also readily ban this existing “right hand turn” as a condition of approval of the lights and the issue is removed.
TfNSW Item 6 * & Council item 4	Need for Council review of any loss of parking on western side of Ramsgate Road together with proposed loss of parking on Rocky Point Road.	<p>The Proponent has undertaken extensive consultation with the local community, local business owners and property owners, who have vocally voiced support for the benefit the proposal will provide, including the provision of new parking for an extended time period than the existing restricted one hour for on street parking. Specifically, the Business Chamber has written a letter of support (refer to <b>Attachment G</b>), noting the proposal will provide a retail anchor and option of longer and free additional parking to service the businesses along Rocky Point Road.</p> <p><b><u>Parking on western side of Rocky Point Road</u></b></p> <p>Initially the Planning Proposal would result in the loss of 12 parking spaces that currently serve the retail tenancies on the western side of Rocky Point Road that will be replaced in the basement carpark of the development. Further studies have been undertaken by Woolworths and their traffic consultant CBRK have indicated that the extent of on-street parking loss on the western side of Rocky Point Road will be minimised. The analysis confirms that there will be <b>no net loss of car parking on the western side of Rocky Point</b></p> <p>The updated analysis shows that:</p> <ul style="list-style-type: none"> <li>• All existing parking spaces adjacent to existing retail tenancies (not subject to the proposal) can be retained as per current conditions;</li> <li>• Four existing spaces adjacent to the subject site will be removed and replaced within the future development; and</li> </ul> <p>Four parking spaces will be gained to the north of Targo Road via the removal of the existing pedestrian mid-block crossing. This will provide a significant benefit to the existing retailers that are not currently afforded any on-street parking adjacent to their tenancies.</p>
Council item 3	Council has raised serious concerns about the increased traffic on Targo Road as a result of the proposed signalisation of Ramsgate Road/Targo Road and Rocky Point Road/Targo Road. SIDRA results indicate that Targo Road will experience an additional peak hour traffic volume of approximately 200-300 vehicles per hour (in both directions) during peak hours due to the traffic generated by the proposal. It is noted that Targo Road currently carries approximately 50 vehicles during peak hours in both directions. Council is of the opinion that any proposed traffic calming measures cannot effectively control the volumes passing through Targo Road but can only passively manage speeding issues that may occur. Any improved LoS at the Targo Road approach to meet TfNSW requirements will further exacerbate the rat run issue, as additional demand will be induced by shorter travel times. This will permanently change the amenity of Targo Road from a quiet local street to one that carries some regional traffic flow.	<p>Traffic modelling undertaken by CBRK demonstrates the extent of additional traffic movements on Targo Road remains within acceptable thresholds for a local road. The proposed traffic lights on Targo Road at Rocky Point Road will significantly improve travel times and safety for existing residents.</p> <p>The subject site has frontage to Rocky Point Road and Targo Road. Rocky Point Road is a classified and therefore subject to the provisions of Section 2.119 of the Transport and Infrastructure SEPP 2021 which applies to any development with frontage to a classified road and requires vehicular access to be provided by a road other than a classified road.</p> <p>The proposal complies with the provisions of the Transport and Infrastructure SEPP by locating all vehicle access points with the exception of service vehicles from a non-classified road being Targo Road. The driveway for the development would be provided approximately 40m-50m from the Rocky Point Road intersection to minimise any impact to the classified road network. With respect to local traffic comments the following can be concluded:</p>

- 
- The proposed installation of traffic lights will significantly reduce delays for existing and future users of Targo Road attempting to access Rocky Point Road. Traffic modelling undertaken by CBRK indicates a marked reduction in average wait times for traffic turning from Targo Road into Rocky Point Road;
  - The majority of vehicles accessing the subject site would be travelling a very short distance along Targo Road (approximately 40m-50m from the Rocky Point Road intersection) and not impact the existing residential properties to the west of the site.
  - Traffic volumes to the west of the site on Targo Road are, based on the CBRK report, forecast to remain within the acceptable thresholds for a local road.
  - The Proponent could undertake a Local Area Traffic Management (LATM) study prior to the commencement of works on the site to identify suitable traffic calming measures that may be introduced to reduce the local road impacts. This could be reinforced via a condition of approval of a future Development Application, in a similar manner to that imposed for the new Bunnings Warehouse at 728-750 Princes Highway in the Bayside LGA.

Furthermore, if 'rat running' does occur along Targo Road, TfNSW and Council as the relevant roads authorities have the ability to amend the phasing of lights to mitigate and prevent 'rat running'.

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## 4.0 Request for Rezoning Review

In accordance with the *Local Environmental Plan Making Guideline*, this Rezoning Review Request is submitted on the basis that Council has failed to indicate their endorsed position for the Planning Proposal within 90 days.

The Rezoning Review process was introduced by the Department of Planning, Housing and Infrastructure with the following objectives:

- To provide a mechanism for applicants to have Council rezoning decisions reviewed.
- To ensure decisions on planning proposals that are well located, planned, and assist housing and job supply can be independently reviewed.
- To increase transparency and provide greater certainty in plan making.

This request is consistent with these objectives as:

- The Planning Proposal delivers on the objectives of the strategic planning framework, including the Greater Sydney Region Plan, South and Eastern City District Plans, NSW Housing Strategy 2041 and the Georges River Local Strategic Planning Statement (LSPS) as described in **Section 4.0** below.
- The Planning Proposal documentation submitted to Council and discussed further in this letter, clearly demonstrates the site has both strategic and site-specific merit, notwithstanding the ongoing dialogue to resolve traffic matters,
- The proposed Part 6 Additional local provision to allow exceptions to the proposed maximum height for the purpose of rooftop lobbies, lifts, lift overruns and plant, provides greater transparency and more certainty over the intended outcome for the site. That outcome is directly consistent with the indicative reference scheme provided within the Planning Proposal. The proposed Additional local provision also provides certainty that the proposed scheme is capable of achieving a high-quality design outcome for the area.

On the basis of the above, we respectfully request that the Planning Proposal be forwarded to the South Sydney Planning Panel for consideration with regards to the merits of the Planning Proposal to proceed to Gateway Determination.

## 5.0 The Planning Proposal

### 5.1 Planning Proposal Parameters

Planning Proposal PP-2024-001, as reported to Council, sought to amend GRLEP as follows:

**Table 2** Existing and Proposal GRLEP 2021 Controls

Control	Existing GRLEP 2021 Provisions	Proposed provisions
Clause 2.2 – Land use zoning	Part E1 – Local Centre Part R4 – High Density Residential	E1 Local Centre
Clause 4.3 – Height of building	Part 15m Part 21m	Part 16m Part 29m
Clause 4.4 – Floor Space Ratio	Part 1.5:1 Part 2.5:1	2.64:1

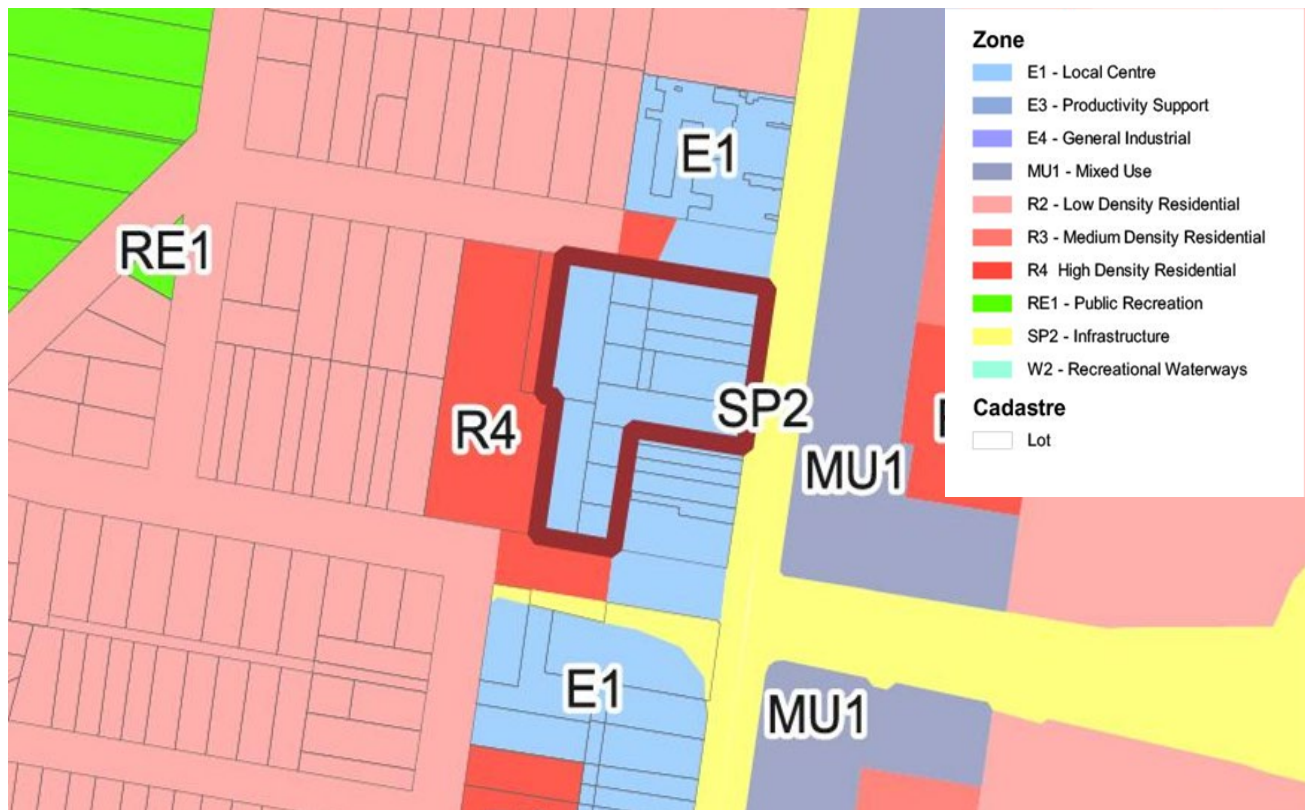
These amendments will be reflected in amendments to the Zoning, Height of Buildings and FSR maps in the LEP respectively.

The following amendments are also proposed to the written provisions of the GRLEP 2021:

- Insert a new Part 6 Additional local provision setting out exceptions to the maximum building height applying to 193-199 Rocky Point Road, 66-68 Ramsgate Road and 2-4 Targo Road, to allow flexibility for future development to provide roof top communal open space and associated built form elements, including lifts, lift overruns, lift lobbies, plant and services
- Council-owned Lot 301 DP 114822 is to be reclassified from ‘community land’ under the Local Government Act to ‘operational land’ to enable future acquisition from Council and eventual redevelopment of the land. These details are proposed to be inserted into ‘Schedule 4 Classification and reclassification of public land’ of the GRLEP 2021.

#### 5.1.1 Land Use Zoning

It is proposed to rezone the site from part E1 Local Centre and part R4 High Density Residential to entirely E1 Local Centre, as shown in **Figure 4**. The intent behind this change is to allow the site to meet the objective of becoming anchor for the Ramsgate Centre. This objective is met through the Planning Proposal enabling a mixed-use development incorporating a major full-line supermarket anchor and complementary retail uses at street level and residential uses above.



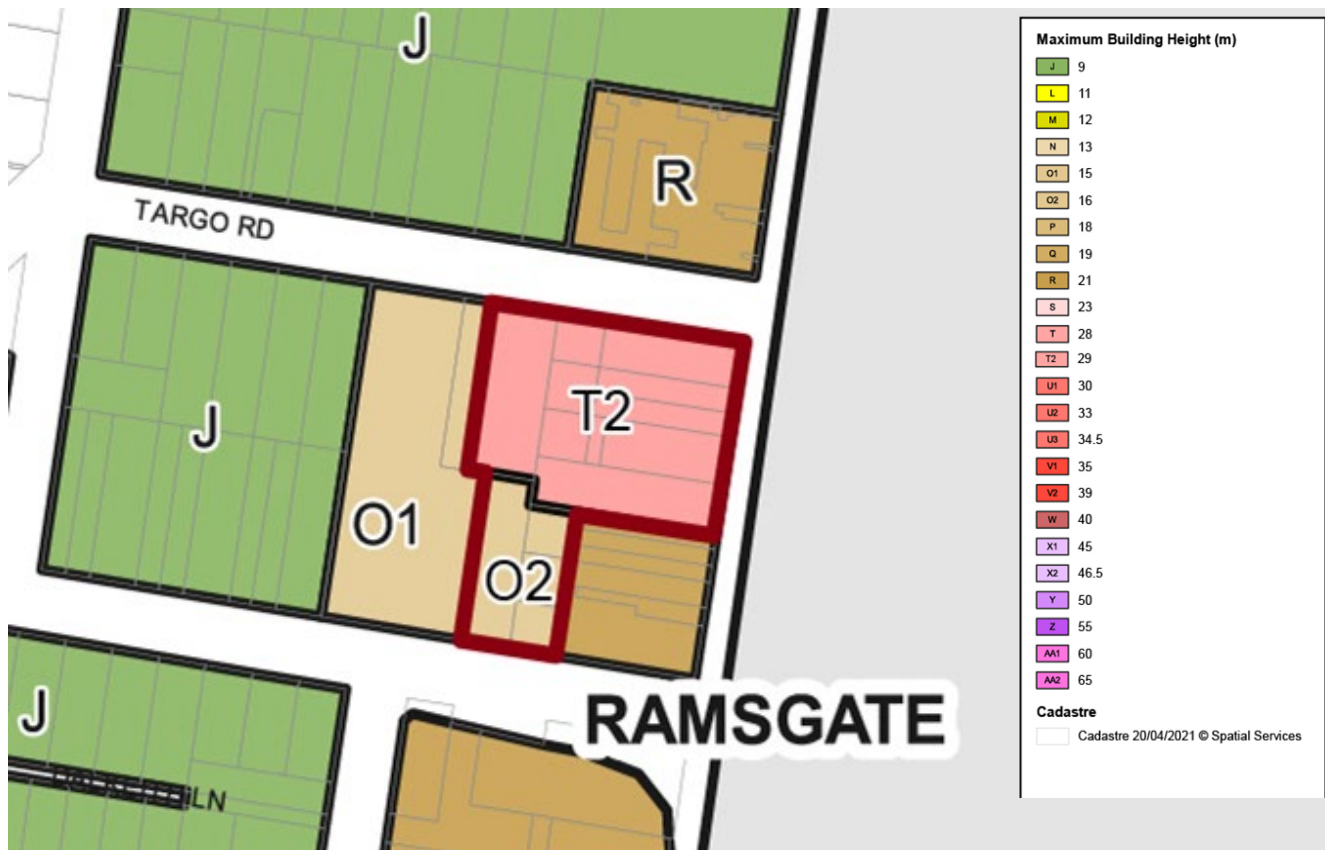
**Figure 4** Proposed Zoning Map

Source: CHC

A key component of the Planning Proposal is the provision of a major full-line supermarket to anchor the development and meet the retail demand and current undersupply of supermarket floorspace within the local area. While a majority of the supermarket will be limited to the current E1 Local Centre zoned land, given the floorspace requirements, configuration and vehicle and access requirement, it will need to occupy a larger portion of the site that goes beyond the portion of E1 zoned land. Therefore, the current split zoning will not permit the development of a major full-line supermarket anchor envisaged under the Planning Proposal, necessitating the entire site to be rezoned to E1 Local Centre.

### 5.1.2 Height of buildings

It is proposed to amend the maximum height of building (HOB) control applicable to the site from part 15 metres and part 21 metres to part 16 metres and part 29 metres, as shown in **Figure 5**.



**Figure 5** Proposed Height Map

Source: Georges River LEP edited by Ethos Urban

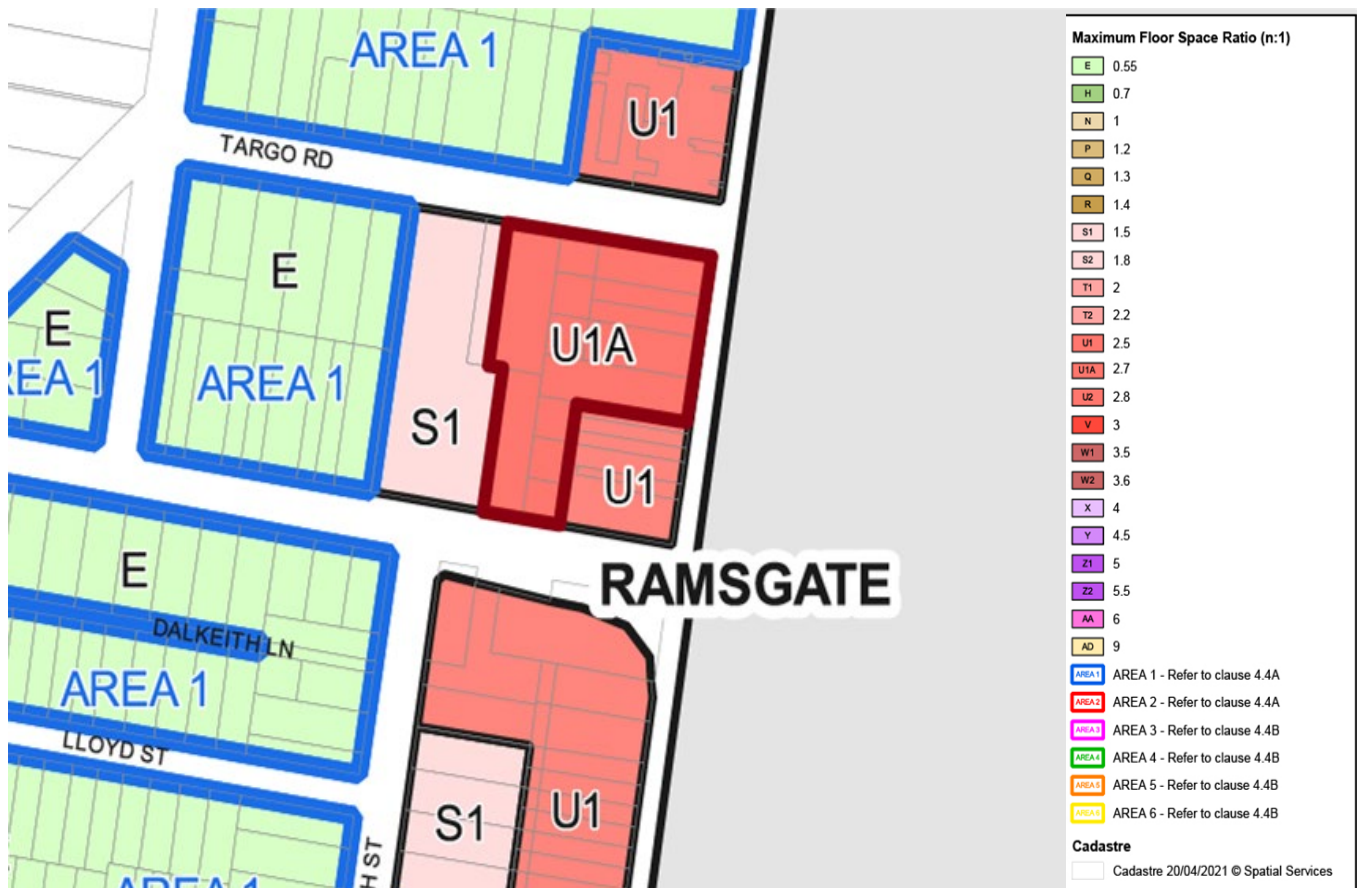
The intent behind the proposed height of building controls is to concentrate height in the north-east corner of the site to minimise impacts on the adjacent neighbours to the west and south. Amending the height controls will allow more compact building footprints on the site and allow the ability to create a landmark development that establishes the role of Ramsgate as a local centre.

It is also noted that the draft site-specific DCP provides additional height, setback and street wall height controls to guide future built form outcomes. The proposed LEP height provisions will need to be considered in conjunction with the site-specific DCP provisions.

Furthermore, to allow flexibility and encourage the provision of high-quality roof top communal open space and access to these facilities as part of any future development on the site, site specific provisions are proposed for inclusion under Part 6 of the GRLEP 2021 as discussed in **Section 4.1.4**.

### 5.1.3 Floor Space Ratio

It is proposed to increase the floor space ratio (FSR) control for the site from part 2.5:1 and part 1.5:1 to 2.7:1 across the entire site, as shown in **Figure 6**. The proposed increase is required to accommodate the changes in built form envisaged under the indicative reference scheme and facilitate a high-quality mixed-use development with a major full-line supermarket anchor and well-located and diverse infill housing options.



**Figure 6 Proposed FSR Map**

Source: GRLEP edited by Ethos Urban

### 1.1.1 Part 6 Additional Local Provisions

Part 6 of the Standard Instrument LEP provides the opportunity for additional specialised provisions to be inserted to address local issues. The Planning Proposal seeks to introduce an additional local provision clause addressing additional building height on the site. To allow flexibility for future development on the site to provide roof top communal space and access to rooftop levels, the following site-specific provision are proposed for inclusion under Part 6 of the GRLEP 2021:

#### Part 6 Additional local provisions

##### 6.19 Exceptions to maximum height of buildings 193-199 Rocky Point Road, 66-68 Ramsgate Road and 2-4 Targo Road, Ramsgate

- 1) This clause applies to the following land at 193-199 Rocky Point Road and 2-4 Targo Road, Ramsgate –
  - a. Lots 8 DP 653883, A and B DP 311887, 193 Rocky Point Road
  - b. SP 83814 and Lot 301 DP 1142822, 197 Rocky Point Road
  - c. SP 77494, 199 Rocky Point Road
  - d. Lot B DP 371250, 66 Ramsgate Road
  - e. Lots 12, 13 and 14 DP 455810, 68 Ramsgate Road
  - f. Lots 1 DP 970582, and 1 and 2 DP 1338117, 2 Targo Road
  - g. Lot B DP 347589, 4 Targo Road
- 2) Despite clause 4.3, development on land to which this clause applies may exceed the maximum height shown for the land on the map, but only if –
  - a. the height of the building does not exceed the maximum height by more than 4m.
  - b. the part of the building that exceeds the maximum building height comprises only the following:
    - i. lift overruns, lift lobbies and associated structures necessary to provide lift access to communal rooftop space,
    - ii. roof-top plant or equipment.
  - c. The part of the building that exceeds the height plane does not result in a non-compliance with the Apartment Design Guide with regard to overshadowing.

#### 5.1.4 Reclassification of Public Land

Lot 301 DP 1142822 is approximately 76.1m<sup>2</sup> and is Council-owned land that is classified as 'community land' under the Local Government Act 1993.

As set out in the *Department of Planning and Environment LEP Practice Note PN 16-001* (October 2016), land classified as 'community' must not be sold, exchange or otherwise disposed of by a council. It can be leased, but there are restrictions on the grant of leases and licence, and also the way community land can be used. There are no special restriction on council powers to manage, develop, dispose, or change the nature and use of operational land.'

'Clause 5.2 Classification and reclassification of public land' in Standard Instrument LEPS enables councils to classify or reclassify public land as operational land or community land in accordance with the Local Government Act 1993. The land is to be reclassified or classified is described in Schedule 4 of the LEP.

Therefore, to enable future acquisition from Council and future redevelopment of the land, it is proposed that land on Lot 301 DP 1142822 be reclassified as 'operational land', and the details of the land be inserted into Part 1 of Schedule 4 'Classification and reclassification of public land' of GRLEP 2021.

It is understood that Lot 301 DP 1142822 was created when 197 Rocky Point Road was developed (DA46/2007), and is the only lot owned by Council on the block to be dedicated in the future to enable a rear lane access between Targo Road and Ramsgate Road, as envisaged in the GRDCP 2021.

The Planning Proposal seeks to consolidate a significant portion of lots within the block to enable a whole-site redevelopment into a high-quality mixed use landmark development.

By amalgamating a significant portion of the block, and providing adequate vehicle/service access and parking to support the redevelopment of the site, the Planning Proposal will allow Council to achieve the intent of the GRDCP 2021 without the requirement for each individual site along Rocky Point Road to redevelop over time and dedicate a portion of their site for the rear lane access (which would likely take several years with no guarantee of success).

The matters set out in the LEP Practice Note (PN 16-001), which all Planning Proposals classifying or reclassifying public land must address for gateway consideration is summarised in the Planning Proposal Report provided at **Attachment A**.

It is noted as part of the previous Planning Proposal for the site (PP-2021-6179), Council previously resolved the sale of Lot 301 in their Finance and Governance Committee meeting on 25 October 2021. A resolution was passed approving the sale of Lot 301, contingent upon the making of the LEP amendment via the previous Planning Proposal. Therefore, the previous resolution of the sale Lot 301 can be considered void, given it was tied to the previous planning proposal. Further discussions are anticipated to take place with Council during the assessment of the Planning Proposal to progress this reclassification concurrently to resolve the sale of Lot 301, subject to this Planning Proposal.

The broad intent of the Planning Proposal is to achieve a future mixed-use development outcome on the site, including a Woolworths supermarket, together with supporting residential land use in a suitable urban form. The purpose of the development will serve an identified undersupply of supermarket floorspace in the area, whilst anchoring the intent for Ramsgate as a 'key' local centre in the strategic planning framework.

#### 5.1.5 Site-specific Development Control Plan

A draft site-specific Development Control Plan (DCP) has been prepared to outline proposed amendments to Part 7, Section 7.2.6 of the *GRDCP 2021*. The draft-site specific DCP aims to provide more detailed guidance to reinforce and ensure the delivery of the key development outcomes of the indicative reference scheme and Planning Proposal material. It is envisaged the draft site-specific DCP will form a subsection of the existing Section 7.2.6 that specifically addressed the following for the site:

- Building height
- Building setbacks
- Building design
- Active frontages
- Public domain
- Landscaping and deep soil
- Parking, loading and access

Other relevant sections of the GRDCP 2021 are intended to apply to development on the site. In the event of any inconsistency between the site-specific DCP and other sections of the GRDCP 2021, this section will prevail to the extent of inconsistency.

## 5.2 Indicative Reference Scheme

The Planning Proposal is also supported by an indicative reference scheme which was prepared by CHC. This illustrates the intended future outcome for the site involves a mixed-use development comprising the key numeric attributes described in **Table 3**.

**Table 3 Key Numeric Attributes of the Indicative Reference Scheme**

Component	Indicative Reference Scheme
Site Area	<ul style="list-style-type: none"> <li>6,376.97m<sup>2</sup></li> </ul>
Maximum Height	<ul style="list-style-type: none"> <li>Building A – 29m</li> <li>Building B – 27.5m</li> <li>Building C – 16m</li> </ul>
Storeys	<ul style="list-style-type: none"> <li>4-8 storeys</li> </ul>
Gross Floor Area	<ul style="list-style-type: none"> <li>Total: 16,888m<sup>2</sup></li> <li>Supermarket: 3,996m<sup>2</sup></li> <li>Residential: 12,914m<sup>2</sup></li> </ul>
Floor Space Ratio	<ul style="list-style-type: none"> <li>2.7:1</li> </ul>
Apartments	<ul style="list-style-type: none"> <li>Total: 141</li> <li>1 bedroom: 30 apartment</li> <li>2 bedroom: 89 apartments</li> <li>3 bedroom: 22 apartments</li> </ul>
Car Parking	<ul style="list-style-type: none"> <li>Total: 445</li> <li>Retail: 192 Car Spaces</li> <li>Residential: 245 Car Spaces</li> </ul>
Loading and Servicing	<ul style="list-style-type: none"> <li>Supermarket – 2 HRV</li> </ul>

Other key components of the indicative reference scheme include:

- A generous landscaped setback along the western boundary to provide a buffer and facilitate a vegetated interface with the adjoining low-density residential properties, ensuring a minimum 11m to Level 1-4, 12m to Levels 5-6 and 13.5m to Level 7. The minimum 6m width provides opportunities for deep soil planting and canopy cover for further screening and mitigate any potential for amenity impacts on adjacent residential properties.
- A 1m setback at the Ground Floor façade along Rocky Point Road to provide a wider footpath to enhance pedestrian movement.
- Provision of three activity nodes for improved public amenity.
  - The first node is located at the corner of Targo Road and Rocky Point Road and has been created by 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 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.

Importantly, the vision is to establish an anchor in Ramsgate through the development of an urban supermarket that is thoughtfully designed to give customers an engaging and interactive shopping experience. Woolworths aims to fulfil the identified demand for a major full-line supermarket by providing a convenient experience for the surrounding population and by achieving additional amenity and a high quality streetscape design outcome for Ramsgate.

The provision of a major full-line supermarket will anchor the development and meet the retail demand and current undersupply of supermarket floorspace within the local area. It will also allow residents direct access to retail uses that support everyday living and elevate Ramsgate's status from 'Village' to 'Local Centre'.



**Figure 7** Architectural Impression – Rocky Point Road

Source: CHC

## 6.0 Strategic Justification

The objective of this Planning Proposal is to seek amendments to the GRLEP 2012I to enable the site's future redevelopment for a high-quality mixed-use scheme that will support achievement of the following intended outcomes:

- **Local Neighbourhood Development** – Deliver a supermarket offering that provides various goods and services in line with the daily needs of the local population within Ramsgate.
- **Community** – Foster a sense of community and facilitate opportunities for social interaction through the creation of public and communal open spaces.
- **Streetscape** – Provide a positive contribution to the streetscape through the provision of greenery, external seating and widened footpaths.
- **Built Form** – Deliver a high-quality built form that aligns with the character and density of the surrounding residential area and local centre.
- **Activation** – Facilitate the activation of the local centre by providing essential services and retail amenities at ground level, contributing to the vitality of the Rocky Point Road spine and reinforcing its 'high street' presence.
- **Job Creation** – Deliver an adequate supply of employment floorspace, consistent with the role and function of a local centre to provide access to day-to-day goods and services.
- **Sustainability** – Ensure the built form can align with the goals established in the Woolworths Sustainability Plan 2025.

To achieve these outcomes, the Planning Proposal will facilitate the future renewal and revitalisation of the site in a manner consistent with the indicative reference scheme, and in doing so create a vibrant mixed-use anchor for the Ramsgate local centre that meets the evolving needs of the local resident population.

As discussed within the Planning Proposal report, there is a current undersupply of supermarket floorspace within the Ramsgate community. This coupled with forecasted population growth will place further pressure on local retail facilities to service the catchment. Indeed, an underperforming and ill-equipped retail network in an inner-city location will inevitably result in significant amenity and lifestyle impacts on local residents and is directly counter to the Council and State Government's aspiration of achieving walkable, liveable and sustainable communities. The Planning Proposal, therefore, aims to support the delivery of local population serving retail services, housing, jobs and community-oriented space. In doing so, the Planning Proposal seeks to provide an appropriate balance of uses that integrate with the existing Ramsgate local centre, whilst supporting the key directions and actions of the strategic plans and policies.

The Planning Proposal's consistency and compliance with the strategic plans and policies is located in the sections below.

### 6.1 Relationship with the Strategic Planning Framework

The Planning Proposal's consistency and compliance with the strategic plans and policies is located in **Table 4** below.

**Table 4** Relationship with Strategic Planning Framework

Framework	Comment
Greater Sydney Region Plan	<p>The Greater Sydney Region Plan guides integrated land use planning and infrastructure delivery over the next 20 years, with longer term vision extending 40 years. The Plan seeks to reposition Sydney as a metropolis of three cities and encourage land use planning and infrastructure integration to deliver a 30-minute city. The Planning Proposal is consistent with this vision in that it will provide a mixed-use local hub that is strategically positioned close to existing and planned housing, employment opportunities, retail offering, amenities and services, transport options and open space (Objective 14).</p> <p>More broadly, the Planning Proposal will align with the objectives of the Greater Sydney Region Plan through:</p> <ul style="list-style-type: none"><li>• Improving local amenity and convenience through providing a supermarket that services the needs of the local community and reduces their need to travel to other supermarkets (located some distance from the site) (Objective 7).</li><li>• Contributing to the activation of the local centre through the provision of three activity nodes where people can gather and meet (Objective 7).</li></ul>

Framework	Comment
	<ul style="list-style-type: none"> <li>Increasing housing diversity within the Ramsgate local centre to ensure there is housing supply and choice that meets the growing needs of the community and future population (Objective 10).</li> <li>Generating additional employment opportunities close to homes and public transport services (Objective 22).</li> <li>Incorporating sustainable design initiatives that seek to mitigating the impacts of climate change (Objective 36).</li> </ul>
<b>South District Plan Eastern City District Plan</b>	<p>The District Plans build upon the Region Plan's vision, objectives and strategies to provide a 20-year plan to manage growth in the context of economic, social and environmental matters. The District Plans echo the Region Plan in that it identifies the importance of providing services and social infrastructure to meet people's changing needs, as well as additional housing supply in the right locations with access to jobs, services and public transport.</p> <p>The District Plans also highlight the objective to foster healthy, creative, culturally rich and socially connected communities which are provided with housing supply in close access to jobs, services and public transport. Creating and renewing great places and local centres for these communities are also a key driver of change within the District Plan. We note that Ramsgate, and in particularly surrounding suburbs of Sans Souci, Beverly Park and Kogarah Bay are largely car dependent and that walkability and access to local services can be a challenge.</p> <p>The site is located on the immediate boundary of the Eastern City and South Districts. Whilst technically located in the South District, Ramsgate is identified as a local centre under the Eastern District.</p> <p>The Eastern City District Plan identifies Ramsgate as a local centre, however the location of the Ramsgate Local Centre is identified further to the east, closer to the suburb of Ramsgate Beach. This is despite Ramsgate being a larger retail centre than Ramsgate Beach, and despite both the Eastern City and South District Plan showing both a 'Train Link/Mass Transit Visionary', 'Road Investigation 0-10 years' and 'Road Visionary' being located immediately adjacent to Ramsgate as opposed to Ramsgate Beach.</p> <p>The South District Plan concludes that the South District will need to accommodate more than 680,000 sqm of additional retail floorspace over the next 20 years. Specifically, the District Plan recognised the importance of growth of supermarket-based local centres in the context of jobs provided and new trends with emerging technologies in the retail sector. The District Plan notes approximately 200 local centres include a supermarket with floorspace greater than 1000 sqm, and these centres account for circa 18% of all Greater Sydney's jobs. Ramsgate centre, together with other local centres has a role to play in delivering these requirements. Woolworths is seeking to offer a full-line supermarket as an appropriate fit to the Ramsgate centre to promote its current role as a 'Village' to an emerging local centre, providing a product range of everyday essentials and local jobs in closer proximity to residents, with the integration of emerging trends such as 'direct to boot', to the fulfill the needs of the community.</p>
<b>Georges River Local Strategic Planning Statement</b>	<p>Under changes made to the EP&amp;A Act, all Councils were required to prepare a Local Strategic Planning Statement (LSPS) to give effect to the Region and District Plan. The LSPS sets out a 20-year vision and planning priorities for the LGA that intend to manage future land uses across the area and implement the community's values and visions. The LSPS will inform changes to Councils' LEP, and other planning policies. The LSPS has rectified the identification of Ramsgate in the South District, as it places Ramsgate along Rocky Point Road rather than location of Ramsgate Beach, as demonstrated in the Eastern City District Plan. In addition, to identifying Ramsgate at its correct location, consistent with the District Plans the LSPS identifies Ramsgate as a 'Local Centre' where there is scope for a future investigation to expand the centre to accommodate additional jobs and homes.</p> <p>The Georges River LSPS outlines an estimated population of 185,346 in 2036 from 153,450 in 2016. The vision for Georges River is an integrated area ensuring people of all ages have access to local places with strong transport connections. As well as access to a range of employment opportunities with the local Georges River centres to be hubs for jobs, shopping, dining, entertainment and community activities. The vision for Georges River includes the support and enabling of placemaking to create safe, liveable, sustainable and economically productive areas.</p> <p>This is outlined through the five interrelated themes of the LSPS, Access and Movement, Infrastructure and Community, Housing and Neighbourhoods, Economy and Centres, and Environment and open space. The Ramsgate centre which the subject site is located within, has a role to play in achieving the objectives of these themes. The proposal will also contribute to meeting the vision for the following priorities of the Georges River LSPS 2020:</p> <ul style="list-style-type: none"> <li>The importance of access to services with lesser dependence on private vehicles for everyday needs (Priority 1).</li> <li>Infrastructure and services within local centres and integrated transport network provide safe, attractive and accessible community hubs (Priorities 2 &amp; 4).</li> <li>Housing is designed to fit the character of the area and be located in well planned places that have access to services (Priorities 8 &amp; 10).</li> <li>A mix of well-designed housing is delivered to cater for all life stages and range of lifestyle needs and incomes (Priority 9)</li> </ul>

Framework	Comment
	<ul style="list-style-type: none"> <li>• A strong focus on supporting the long-term viability of local centres is key part of Council's approach to deliver employment growth and attractive, lively, accessible and productive centres (Priorities 13 and 15)</li> <li>• Development enhances the public domain and provides opportunities to increase urban tree canopy in local centres (Priority 17).</li> </ul> <p>The development of a mixed-use building comprising of a full-line supermarket and housing above, will enhance the Ramsgate centre and promote the centre from its current role as a 'Village' to 'Local Centre' which will further add to the realisation of the vision outlined in the LSPS. The development will further increase the access to the products needed for people's everyday life that is not present in a smaller format 'convenience style supermarket or grocer. Further, an increase in housing in the Ramsgate local centre will further strengthen the centre's businesses as the residents utilise the services the centre offers.</p>
<b>Georges River Local Housing Strategy</b>	<p>The Georges River Local Housing Strategy (LHS) was adopted in August 2020 to create a framework that will deliver housing to meet the existing and future needs of the Georges River community. It sets out the strategic direction for housing in the LGA over the next 20 years, and identifies the housing demand, gaps and issues as well as establishing housing objectives to manage future growth.</p> <p>The South District Plan requires Georges River Council to supply 4,800 additional dwellings by 2021. For 6-10 years and 10-20 years, the LSPS identifies the following housing targets for the LGA:</p> <ul style="list-style-type: none"> <li>• 6-10 year (2021 to 2026): additional 3,450 dwellings</li> <li>• 10-20 year (2026 to 2036): additional 5,750 dwelling</li> </ul> <p>Based on 3,000 dwellings completed from January 2016 to March 2020 (average of 800 dwellings per year), the LHS notes that it will be challenging for Georges River to meet the South District Plan target of 4,800 dwellings for 0-5 years.</p> <p>To ensure Council delivers an additional 14,000 dwellings by 2036, the LHS states that further work will be conducted in future LEPs to accommodate the shortfall in the 0-5 years and create flexibility for additional take up in the 6-10 year and 10-20 year dwelling targets.</p> <p>Council intends to achieve the 6-10 year housing target through the following:</p> <ul style="list-style-type: none"> <li>• Up-zoning of five potential Housing Investigation Areas</li> <li>• New consistent LEP controls across the LGA</li> <li>• Existing major development and Planning Proposal sites</li> <li>• Potential dwellings that are currently under DA assessment</li> </ul> <p>The LHS shows that Ramsgate has the highest proportion of flats/shop-top housing, and the lowest share of separate houses. Accordingly, the Planning Proposal is in full alignment with the LHS as it seeks to deliver 144 dwellings that are consistent with the existing character of the area, and provide more diverse housing options outside of major centres that can suit both downsizers and family households. Specifically, the LHS shows that there is a mismatch between existing dwelling supply and dwelling suitability, with 60% of dwellings in Ramsgate having one spare bedroom. Accordingly, there is a need for more appropriate and smaller dwelling sizes that cater to household needs, and the Planning Proposal will contribute to fulfilling this identified shortfall and housing need.</p>

## 7.0 Strategic Merit

The Planning Proposal, demonstrates strategic merit as:

- The site upholds high strategic value as it is located in a well-connected and well serviced area of the South District and Eastern City District. The site is aligned with the growth directions of the Greater Sydney Regional Plan and South District Plan and Eastern City District Plan in supporting the vision of a 30-minute city.
- The Planning Proposal provides the opportunity to elevate the role of the Ramsgate from 'Village' to 'Local centre', in line with the LSPS and the established centres hierarchy, through accommodating new housing and job opportunities within close proximity to public transport. The proposal directly unlocks residential and employment generating floorspace to support future population's growing and changing needs.
- The provision of a full-line supermarket offering will satisfy current market demands and provide improved choice, range and price competition for local residents within the local catchment.
- Redevelopment of the site for a new supermarket will serve an identified undersupply of supermarket floorspace in the area, whilst helping to reinforce the role of Ramsgate as a 'key' local centre in the strategic planning framework.
- The co-location of uses on an accessible site will result in improved travel times and convenience for residents, and ease congestion at existing stores as well as on the local road network, as the need to travel to supermarkets outside of the centre for grocery needs will be diminished by the proposal.
- The site's location is in close proximity to local bus routes, provides an opportunity to deliver integrated land uses within an existing and emerging local centre, which aligns with the 30-minute city vision.
- The proposal's future land uses will promote social cohesion and activation through the delivery of active edges at three key interfaces to provide opportunities for people to gather and meet.
- The proposal responds to the increasing growth pressures for increased local job opportunities and increased housing provision that is suited to the current and future demographic within Ramsgate.

## 8.0 Site-Specific Merit

The Planning Proposal has been determined to demonstrate site-specific merit for the following reasons:

- It will enable the integration of land uses on a site with the emerging Ramsgate local centre, in accordance with the overarching vision within the LSPS.
- The proposed planning controls will facilitate the provision of a mixed-use development for a full-line supermarket and residential apartments above with an envelope suitable in terms of height, bulk and scale and which activates a prominent corner.
- The Ramsgate local centre will become anchored by the site's proposed retail provision in supporting the immediate urban catchment and complement other retailers in Ramsgate;
- The reference scheme, incorporating the site specific LEP and DCP controls, will deliver a building separation zone adjacent to the western boundary, including a deep soil zone and a publicly accessible footpath. This will provide a high quality and appropriate interface between the development and the adjacent residential properties to the west of the site.
- The proposal represents a contemporary design that is suitable for the Ramsgate local centre with strong vertical and horizontal elements and facades which contribute to the high street presentation along Ramsgate Road, Rocky Point Road, and Targo Road. The scheme responds to the surrounding character and existing architectural scale of Ramsgate.
- The proposed built form, which has been refined to account for feedback received on the previous scheme, demonstrates a high quality design which exhibits the principles of the Apartment Design Guide. The concept proposal is designed to accommodate a variety of sustainability features and deliver beyond its required targets for sustainability, energy efficiency and water and waste management.
- The indicative scheme provides a range of apartment sizes with high amenity, which will create a level of activation which will support the success of the local centre.
- It has been determined that the existing infrastructure and services on the site will be capable of supporting the future redevelopment of the site.

## 9.0 Conclusion

This request for a Rezoning Review is submitted on the basis that Council has failed to indicate their endorsed position for the Planning Proposal within 90 days.. It is considered that the proposal is consistent with the relevant strategic planning framework, including the Georges River Local Strategic Planning Strategy 2021 as it will provide additional housing and employment opportunities within the establishing and emerging Ramsgate local centre.

We, therefore, respectfully recommend that in considering this review request, a full review of the Planning Proposal (PP/2024/0001) is undertaken by DPHI.

As required under Section 3.33 of the EP&A Act, the strategic and site-specific merit of the Planning Proposal is demonstrated as follows:

- The Planning Proposal is consistent with the strategic planning framework, including the Greater Sydney Region Plan, South District and Eastern City District Plans and LSPS.
- The Planning Proposal will reinforce the role of Ramsgate as a 'key' local centre and enable the attainment of a 30-minute city by providing co-locating employment generating uses and residential apartments within an accessible local centre.
- The Planning Proposal demonstrates that the site can suitably accommodate Woolworth's vision to deliver a high-quality mixed-use scheme anchored by a best-in-class supermarket, whilst minimising environmental impacts and delivering a built form that responds to the context and aspirations for the Ramsgate local centre.
- The Planning Proposal has received overwhelming support from the local community, specifically from the businesses along Rocky Point Road and Business Chamber South which has stated *"We believe this proposed development is a significant opportunity for the economic and social enhancement of our community. Business Chamber South strongly advocates for projects that offer substantial benefits to the local area, and this development is a prime example"*.

We trust this information is what you require at this stage to progress this request, however, should you have any queries about this matter or require any further information, please do not hesitate to contact the undersigned.

Yours sincerely,



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