

8 August 2022

The Department of Planning, Industry & Environment  
By email: [information@planning.nsw.gov.au](mailto:information@planning.nsw.gov.au)

To whom it may concern  
Dear Sir/Madam,

**RE: WOOLWORTHS PLANNING PROPOSAL AT  
193-199 ROCKY POINT ROAD, 2-6 TARGO ROAD AND 66-68 RAMSGATE ROAD, RAMSGATE**

I write this submission on behalf of the members of the Kogarah Bay Progress Association (KBPA) and the wider Ramsgate and Sans Souci community requesting the Department **not** proceed to a **Gateway Determination** for the above Planning Proposal.

We at the KBPA believe the reasons put forward by the proponent indicating the site has both strategic merit and site-specific merit are flawed as outlined below:

**STRATEGIC MERIT**

Georges River Council (GRC) adopted the Commercial Centres Strategy, Part 1 in February 2020. This strategy was based on a comprehensive land use and floor space audit of all business-zoned land in the Local Government Area (LGA). All business centres i.e. 48 centres within the LGA, were classified based on the amount of retail floor spaces and facilities provided.

Ramsgate was classified as a '**Village**' as it supports a local resident and worker population with 1,000 to 3,000 square metres of retail floor space.

Even though the Commercial area is zoned B2 it is still classified as a '**Village**' under the GRC Commercial Centres Strategy, Part 1.

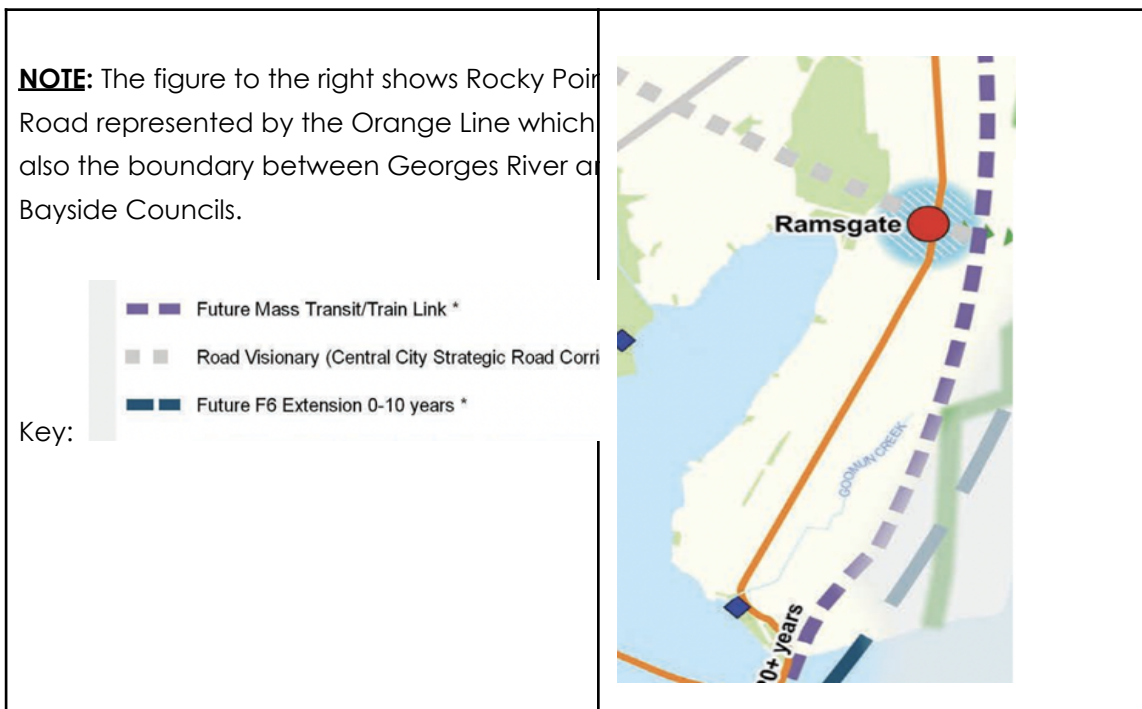
The KBPA argues strongly against the assertion that the Planning Proposal has strategic merit, as it is not supported by the GRC Commercial Centres Strategy, Part 1. In particular, the Planning Proposal states that the GRC Commercial Centres Strategy, Part 1, identifies Ramsgate for opportunities to grow by more than 15 per cent in Commercial floor space by 2036. The 15% stated in the GRC Commercial Centres Strategy, Part 1, was **to be spread among 39 centres classified as 'village', 'small village', 'neighbourhood centre' and 'enterprise corridor', not only in one centre**. One of the criteria set out in the GRC Commercial Centres Strategy, Part 1, for a spot rezoning proposal and expansion of a Commercial Centre, prior to GRC finalising the Commercial Centres Strategy, Part 2, was that it does not impact the economic viability and performance of the existing centre. In the opinion of KBPA this Planning Proposal will have enormous negative impacts on the commercial viability of all of the remaining shops in the Ramsgate village.

Although the strategy did suggest Ramsgate Shopping Village along Rocky Point Road could see an expansion for additional floor space, the proponents of the Ramsgate Planning Proposal are pre-empting the outcome of the GRC Commercial Centres Strategy, Part 2, which in part is to investigate which of the 48 commercial centres within the GRC LGA are suitable for expansion.

The Planning Proposal also states it has strategic merit as the Ramsgate Shopping Village along Rocky Point Road is located on an identified corridor for a future train link/mass transit route and future road or motorway projects.

Rocky Point Road has not been identified for future road or motorway projects nor is it identified for a future mass transit/train link route. Rocky Point Road at Ramsgate is not part of any future motorway. The future motorway corridor is the M6 Motorway, which is approximately 400 metres east of Rocky Point Road. This corridor has been in existence in State Government ownership for over 60 years. Further to this point, GRC's Local Strategic Planning Statement also shows the future mass transit/train link a considerable distance east of Rocky Point Road.

Figure below is an extract from the GRC Strategic Planning Statement – 2040



In essence this Planning Proposal does not have strategic merit, which is one of the key drivers to a rezoning review by the Department.

### **SITE-SPECIFIC MERIT**

It is quite clear that Council was not satisfied with the Planning Proposal in relation to interface, bulk and scale and traffic generation impacts otherwise the Applicant would not have appealed to the Department for a review.

To suggest that a Report by GRC Officers titled **Activating Our Centres Policy** was a reason this Planning Proposal is in line with Council's policies and has site-specific merit is quite incorrect. The **Activating Our Centres Policy Report** was not supported by GRC at its meeting held on 28 March, 2022 when it resolved **not** to proceed with this draft policy. In other words, it did not have GRC support and has never been on public exhibition.

The proponent also states it has site specific merit as it is in accordance with a previous GRC DCP'2013, in respect to a basement supermarket. This GRC Development Control Plan (DCP) identified an amalgamated site at 183-191 Rocky Point Road and 1a Targo Road in the existing commercial zone as an opportunity to provide a basement supermarket above the 1,000 square metre rule for supermarkets if it was at a basement level. This incentive bonus floor space was to encourage a small supermarket within the curtilage of the existing B2 zone. To suggest a 4,100 square m basement supermarket with an additional 1,680 square metre basement liquor store is in line with GRC's policy at that time is completely false.

The KBPA also disputes the claim that this Planning Proposal has site specific merit as it addresses and mitigates the traffic effects on the adjacent road network. A new set of traffic lights at either end of Targo Road will not deliver positive outcomes for the local area. In fact, the KBPA believes these proposed traffic lights will cause greater traffic congestion in conjunction with the traffic lights at the intersection of Rocky Point Road and Ramsgate Road. At present there are many directional '**No Right Turn**' signs particularly on Rocky Point Road. In fact at the intersection of Rocky Point and Ramsgate Roads there are three No Right Turns alone. With the proposed added traffic generation, this will cause traffic rat-runs through local roads to access this site and move about the area, therefore having a hugely detrimental impact on the local area.

### **SUMMARY**

In summary, the KBPA strongly urges the Department of Planning, Industry & Environment not to proceed to a Gateway Determination with this current Planning Proposal as it does not have strategic or site specific merit.

GRC is preparing a Commercial Centres Strategy, Part 2 which, as stated above, is to investigate which of the 48 commercial centres of any classification, are suitable for expansion. The DPIE should refuse this Planning Proposal until that study is finalised.

The expansion and rezoning of the five residential R4 zoned properties to Commercial B2 when these properties were only rezoned from R2 in 2016 sets a dangerous precedent for high density creep and over intensification in all of our village classification centres and other commercial areas within our entire LGA.

Further, this Planning Proposal will severely impact the adjoining and nearby residents in regard to overshadowing, privacy, visual scale and bulk, noise, off-street car parking and on street parking for adjacent residents, traffic generation and will jeopardise the commercial viability of all the remaining shops on both sides of Rocky Point Road.

It will undoubtedly impact the viability of those remaining shops on Rocky Point Road between Ramsgate Road and Targo Road with a future no stopping zone in front of their shops.

Finally, the traffic congestion around Rocky Point Road, Targo Road and Ramsgate Road as it presently exists is at saturation point. The traffic that will be generated from the planning proposal will create an even more horrendous situation.

Until the GRC Commercial Centres Strategy, Part 2 is completed, which will consider the roles and functions of all the 48 commercial centres including Ramsgate and provide centre specific objectives, built form guidelines and whether or not centres like Ramsgate have potential for expansion from the current LEP and DCP Controls, any major departure from our existing Local Environmental Plans (LEP) Controls should not be considered.

It is therefore hoped that the Department will see the merit in this submission and refuse Gateway determination.

Yours sincerely,



Jeff Powys – President  
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