

2 July 2026

TfNSW Reference: SYD26/00611/01
DPHI Reference: SSD



Ms. Kiersten Fishburn
Secretary
Department of Planning, Housing, and Infrastructure
Locked Bag 5022
Parramatta NSW 2150

Attention: Harrison Evans

**REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)
MIXED USE DEVELOPMENT
4-16 MONTGOMERY STREET, KOGARAH**

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) an opportunity to provide input to the Secretary's Environmental Assessment Requirements (**SEARS**) for the proposed State Significant Development Application (**SSDA**) at 4-16 Montgomery Street, Kogarah.

TfNSW has reviewed the Scoping Report (prepared by Colliers, dated 5 June 2026) and provides assessment requirements and comments in **TAB A** for the consideration of the Department of Planning, Housing and Infrastructure (**DPHI**).

Should you have any questions regarding the above matter, please contact Narelle Gonzales, Development Assessment Officer, on phone 0409541879 or via email at development.sydney@transport.nsw.gov.au

Yours sincerely,

Rachel Davis
A/Senior Manager Complex Development Services Planning
Transport Planning Branch
Planning, Integration and Passenger Division

OFFICIAL

TAB A – TfNSW Assessment Requirements and Comments

1. **Transport Impact Assessment (TIA)**: A TIA shall be prepared in accordance with the *Guide to Transport Impact Assessment (GTIA)*. GTIA replaces the Guide to Traffic Generating Developments and can be found at this [link](#). The TIA will enable TfNSW to understand the impacts the development may have on the transport network, as well as the impacts to the classified road network resulting from increased vehicular, bus and pedestrian/active transport movements. The TIA must include, but not be limited to, the following:
 - a) Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and
 - b) Measures to integrate the development with the existing/future public transport network.
 - c) A review of the crash data along the identified transport route/s and key nearby intersections for the most recent 5-year reporting period and an assessment of the safety implications of the proposed development and any required mitigation measures.
 - d) Details of the site access and pedestrian network and parking provision associated with the proposed development, in accordance with the relevant Australian Standards, Austroads Guide and Council's Development Control Plan (DCP).
 - e) Plans demonstrating how all vehicles likely to be generated during construction can be accommodated on the site to avoid impacts to the transport network. A preliminary Construction Transport Management Plan (CTMP) should be prepared as part of the TIA to mitigate any such impacts.
 - f) Given the site's proximity to Kogarah Train Station, TfNSW encourages the proposal to minimise the reliance on car usage through providing minimal parking spaces and the implementation of Travel Demand Management (TDM) measures.
 - g) Details of TDM measures to be utilised to minimise the development impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and/or specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site.
2. **Car Parking**: As the site is currently well serviced by rail and bus and will benefit from the proximity to the public transport network, car parking provision should give consideration to the requirements identified in the GTIA and lowest applicable car parking rate as per the *Georges River Development Control Plan* to encourage mode shift to public and active transport modes.
3. **Transport Orientated Development (TOD)**: The area around Kogarah Train Station has been identified as a TOD location under the provisions of the *State Environmental Planning Policy (Housing) 2021*. Whilst the subject site is not specifically identified as a TOD site, the proposal should still aim to be consistent with the TOD objectives and intended outcomes.
4. **Rezoning**: TfNSW notes that this SSDA is subject to a concurrent Planning Proposal to increase the maximum permitted height and floor space ratio and to introduce an additional permitted use to enable residential flat buildings. Details of the proposed Local Environmental Plan (LEP) amendments to facilitate this development should be provided as part of the Planning Proposal documentation and early consultation with TfNSW is encouraged in the process.



Reg No.: 26/0604

Tuesday, 7 July 2026

Your Reference: SSD-125914490

To: NSW DEPARTMENT OF PLANNING HOUSING
AND INFRASTRUCTURE on behalf of Charter Hall Pty
Ltd

SEARS - Mixed-use development at 4-16 Montgomery St, Kogarah

Controlled Activity: OLS ENQUIRY – SEARS: Scoping Proposal
Location: 4-16 MONTGOMERY ST KOGARAH
Council: NSW DEPARTMENT OF PLANNING HOUSING
AND INFRASTRUCTURE

Sydney Airport acknowledges receipt of a request for comment in relation to the above proposal on the 10th June 2026.

This advice is provided in the context of airspace protection requirements applicable to development within the vicinity of Sydney Airport.

The site is located within the prescribed airspace for Sydney Airport and is therefore subject to the: Airports (Protection of Airspace) Regulations 2026

Development within prescribed airspace may constitute a controlled activity, requiring assessment and approval by the Commonwealth where applicable.

The height of the Obstacle Limitation Surface (OLS) Inner Horizontal Surface for Sydney Airport over this site is 51m AHD.

Development that penetrates or has the potential to penetrate protected airspace surfaces may trigger the controlled activity provisions.

In addition to OLS, proponents should be aware that assessment under the 2026 Regulations may also consider:

- Instrument Flight Procedure (PANS-OPS) surfaces
- Communication, navigation and surveillance systems

Sydney Airport

Sydney Airport Corporation Limited ACN 082 578 809 — The Nigel Love Building, 10 Arrivals Court, Locked Bag 5000
Sydney International Airport NSW 2020 Australia — Telephone +61 2 9667 9111 — sydneyairport.com.au

SYD Classification: Confidential

- Current and future airspace design considerations

Sydney Airport advises the following:

Development that exceeds 51m AHD (OLS Inner Horizontal) will constitute a controlled activity requiring referral under the Airports (Protection of Airspace) Regulations 2026

- Early engagement with Sydney Airport is recommended to confirm applicable airspace constraints and regulatory pathways.

Sydney Airport notes that construction cranes may be required to operate at a height significantly higher than that of the proposed development and consequently, may not be approved under the Airports (Protection of Airspace) Regulations 1996.

Sydney Airport strongly recommends that approval to operate construction equipment (ie cranes) should be obtained prior to any commitment to construct.

Sincerely,



Robert King
Airspace Protection Manager

Sydney Airport



AIR NAVIGATION, AIRSPACE AND AERODROMES BRANCH

CASA Ref: F23/1376-37

Your Ref: SSD-127928740 Email Mon 15/06/2026 3:52 PM

Harrison Evans harrison.evans@dpie.nsw.gov.au

DPHI

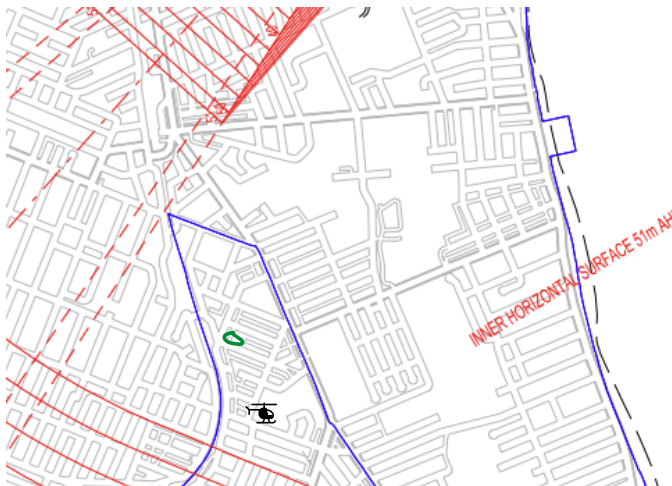
NSW Submit on Major Projects Portal

MAJOR PROJECTS - MIXED USE DEVELOPMENT 4-16 MONTGOMERY STREET, KOGARAH: CASA COMMENTS ON SEARS

The Department sent CASA a request for advice in relation to the proposed Mixed Use Development at 4-16 Montgomery Street, Kogarah. CASA has briefly reviewed the June 2026 Scoping Report by Colliers. The Scoping Report indicates a Building Height '23 to 29 storeys'. Which, at ~3.1m per storey, would be very approximately 90m above ground level; on 30m high ground will be very approximately 120m above AHD / RL (almost as tall as Green Square).

As indicated from the Obstacle Limitation Surfaces diagram below (from the Sydney Airport web page - tilted) the building would infringe the Inner Horizontal Surface by very approximately up to 70m max. An Approval by the federal Department of Infrastructure... will be required under the Airports (Protection of Airspace) Regulations 2026 (following an assessment by Sydney Airport, CASA and Airservices Australia). For the building(s) and crane(s).

We are not town planners and we don't know what other tall buildings exist or are planned in the area, but we have assessed buildings up to about 60m above AHD in Stanley Street and up to about 75m above AHD in Railway Parade, Kogarah and looked at SEARs for 2-4 Victoria Street recently (very approximately 100m above AHD).



An Aviation Impact Assessment (light) by an expert aviation consultant familiar with helicopter operations is advisable as this development could be the tallest structure in the area and is only about 420m to the St George hospital helipad. The following should be covered (not limited to):

- Aircraft approaching and departing Sydney Airport including comment on one engine inoperative considerations and missed approaches.
- Helicopters approaching and departing St George Hospital Helicopter Landing Site including existing and proposed flight paths, gradients etc.
- Crane(s) required (at least type, height and duration) to construct the building(s) including recommendations for lighting and marking.
- Night vision aspects for helicopters, if any.
- Airservices assessment or consultant sourced information on Communications, Navigation, Surveillance, PANS-OPS, Instrument Flight Procedures etc.
- The possibility of instrument approach procedure(s) at St George Hospital in future.
- Applicable Regulations related to Aviation Safety.

Not being a drafter of SEARs, I don't know how to translate the above into SEARs speak (or at least advise the EIS/AIA drafter).

It is also recommended that the operator of the St George hospital helipad (Health Infrastructure or Health Region?) be considered a stakeholder and comment on the EIS/AIA.

Yours sincerely

David Alder

David Alder David.Alder@casa.gov.au

Aerodrome Engineer

22 June 2026

25 June 2026

Major Projects / State Significant Development
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124
Via Major Projects Portal

CC: Harrison Evans

Georges River Council comments on SEARS – Proposed Mixed-Use development at 4-16 Montgomery Street, Kogarah

I refer to the request from NSW Department of Planning, Housing and Infrastructure (DPHI) in relation to the above-mentioned application at 4-16 Montgomery Street, Kogarah to provide comment on the Secretary's Environmental Assessment Requirements (SEARs) for the proposed State Significant Development (SSD) and concurrent rezoning.

It is noted that the applicant has submitted a Scoping Report outlining a significant uplift in building height and density beyond the existing planning framework.

Council requests that the matters outlined below be expressly addressed in the SEARs to ensure the Environmental Impact Statement (EIS) provides sufficient information for a robust and transparent assessment.

Council appreciates the opportunity to provide comments and looks forward to ongoing consultation with DPHI.

Request for information to be included in the SEARs / EIS

The SEARs should include standard planning assessment requirements, along with the following documentation specific to the proposal:

1. Strategic Planning, Scale and Height Justification

The EIS should include a comprehensive strategic planning assessment that follows the *Local Environmental Plan Making Guideline (August 2023)* and justifies the proposed uplift in height and floor space ratio (FSR), having regard to the existing planning framework and the strategic role of the site.

In particular, the EIS should:

- Clearly demonstrate the need for the proposed uplift and justify why the site is suitable for a substantial increase in height and FSR within the existing planning context.
- Assess consistency with relevant strategic planning instruments, including the Sydney Region Plan, South District Plan, Georges River Local Strategic Planning Statement (LSPS) and Georges River Commercial Centres Strategy and draft Sydney Plan and identify any departures from the intended future character of the area.
- Provide a place-based justification for any departure from the planning framework, distinguishing strategic merit from development feasibility.

2. Non-Residential Floorspace

Kogarah is identified as a Strategic Centre, it must continue to sustain and strengthen its role as a key employment hub alongside accommodating residential growth. A balanced and integrated approach to the provision of office and retail floorspace is therefore critical.

It is important that the development is consistent with the 1:1 non-residential FSR requirement under the Georges River Local Environmental Plan 2021 (GRLEP 2021). If proposed, the EIS must clearly and robustly demonstrate why a reduction of the required non-residential FSR is warranted, and how the proposal will continue to meet the intended employment outcomes for Kogarah as a key commercial and employment hub.

3. Public Open Space

Kogarah is identified as having a deficiency of public open space within and surrounding the Kogarah Strategic Centre. Addressing this shortfall is essential, particularly in the context of the scale of intensification proposed development. The provision of public open space must be treated as a fundamental component of the development, ensuring that it directly responds to the needs generated by increased density.



The proposal must clearly demonstrate how it will deliver adequate public open space to address the existing deficiency and meet the needs of future residents, workers, and the broader community. Where the development does not provide sufficient on-site open space, the EIS must present a robust and evidence-based justification for this shortfall.

It is noted that in previous discussions with the proponent, a previous proposal included a plaza that was approximately 2,500sqm in size, representing approximately 7% of the site area (as required by the ADG for deep soil planting). Council previously advised that the provision of a sufficiently sized, safe, useable, green, and publicly accessible spaces is key for the success of not only the precinct, but the Kogarah Strategic Centre as a whole.

4. Draft Kogarah Strategic Centre Master Plan

Council is preparing the draft Kogarah Strategic Centre Master Plan (anticipated exhibition mid-2026).

The EIS should:

- Demonstrate consistency with emerging strategic directions.
- Assess whether the proposal pre-empt or undermines planned outcomes for the Kogarah Strategic Centre Master Plan, noting that it has been subject to early community engagement.
- Assess alignment with intended role and function of the Kogarah Strategic Centre.

5. Heritage

It is recommended that any progression of the proposal is undertaken in consultation with a suitably qualified and experienced heritage consultant, having regard to the identified significance of the following heritage items within the vicinity of the site.

- Item 177 – Former Sixth Church of Christ Scientist – Grace Chinese Church
- Item 191 – Terraces, “Burn Brae”
- Item 190 – House and garden, “Stanmer”
- Item 189 – Terraces
- Item 202 – Shops
- Item 179 – Terraces, “Leah Buildings”



The heritage consultant must provide detailed, evidence-based advice to inform appropriate built form outcomes, including building envelopes, massing, scale, and setbacks. This advice must ensure that new development appropriately responds to, respects, and does not detract from the significance, setting, and visual prominence of nearby heritage items. Design principles must be clearly articulated and applied to safeguard heritage values and guide future development of the site.

6. Affordable Housing

Georges River Council has prepared a draft Affordable Housing Contribution Scheme (AHCS), which is intended to amend the GRLEP 2021 and facilitate the delivery of affordable housing within identified areas of the LGA.

While the AHCS has not yet been finalised or gazetted at the time of lodgement, the proposal has proactively considered the intent, strategic justification, and likely operation of the draft scheme. The development acknowledges Council's policy direction to increase the supply of affordable housing and support housing affordability outcomes across the LGA.

7. Public Benefits - Local Infrastructure and Community Facilities

The proposal will result in a significant increase in the number of residents and workers on the site. This will generate direct impacts and demand on local infrastructure and community facilities, including road and traffic facilities, transport facilities, open space and recreational facilities, public domain and community facilities.

The Georges River Local Infrastructure Contributions Plan 2021 was prepared to meet the future population demands within the capacity of the current Georges River Local Environmental Plan 2021 (GRLEP). The Contributions Plan did not anticipate this proposal and as a result the community facilities and services in the Plan would not adequately support the proposal.

Council requests that the Concept Masterplan and rezoning proposal address the impacts on infrastructure and community facilities and the delivery mechanisms, including a voluntary planning agreement, provisions in the GRLEP2021 and / or conditions on development consents.

To assist in discussions, **Attachment 1** identifies a range of infrastructure works and facilities that have been identified in key strategic plans and strategies, that would help to support the proposal and the potential delivery mechanisms.



For context's sake, Council's previous planning advice on pre-planning proposal applications for this site are provided as **Attachment 2**.

This advice represents officer commentary on key issues and should not be construed as Council's endorsed position on the proposal.

Should you wish to discuss the above matters, please contact Michelle Fawcett, Strategic Planner on 9330 9469 or via email at mfawcett@georgesriver.nsw.gov.au

Yours sincerely



Luke Oste
Manger Strategic Planning

Attachment 1: Local Infrastructure and Community Facilities

General Provision

The infrastructure works and facilities identified in Table 1 are preliminary and will be informed by further technical studies and reports, including the Transport Impact Assessment, Design Report and Social Impact Assessment and discussions. These works are not included in the *GRC Local Infrastructure Contributions Plan 2021*.

Table 1: Preliminary Infrastructure Works and Community Facilities

Category	Infrastructure works and facilities	Delivery Mechanism
New public open space - green space	Creation of a new publicly accessible green open space area within the site to address increased demand for open space and increase permeability and building separation.	VPA / GRLEP provision / Condition of Consent
Existing open space upgrades	Upgrades to existing local open space, parks and sporting facilities to address increased demand. Local parks in close proximity to the site include Hogben Park, Edith Blake Reserve, Jubilee Oval.	VPA
Public domain upgrades	Upgrades to the public domain to address increased demand arising from the development. The <i>Draft Kogarah Strategic Centre Master Plan</i> identifies proposed public domain works.	VPA / Condition of consent
Through site links and connections	Due to the size of the site and central location in the Kogarah Strategic Centre, the creation of public access easements within and through the site will enable pedestrian permeability and connections to Kogarah Railway Station, Kogarah shopping strip, local schools, TAFE campus and hospitals.	VPA / Condition of Consent
Road network and traffic infrastructure upgrades	Upgrades to the road network, traffic facilities, pedestrian safety and public transport infrastructure to be informed by the Traffic Impact Assessment for the proposal and Council Transport Strategy and studies.	VPA / Condition of Consent
Active transport	Provision of pedestrian pathways, bicycle lanes, pedestrian refuges, crossings, speed patches, line marking and signalised intersections along key travel paths, subject to identified gaps. Active transport link initiatives are identified in	VPA



	Council strategies and the <i>Draft Kogarah Strategic Centre Masterplan</i> include: ○ improve strategic walking and cycling connections with Hurstville City Centre and Hogben Park, ○ improve laneways in the Kogarah Strategic Centre for walking and cycling, ○ additional cycle parking at Kogarah Train Station, ○ create a green network in the Kogarah Strategic Centre, ○ improve signage to open space and parks.	
Community Facilities and Services	The proposal will directly increase demand for library services and community facilities. Expansion of services and facilities including provision of self-service facilities, library book stock, resources and multi-use spaces.	VPA
Public Art	Integration of public art within the site in consultation with the community and Council. A draft Public Art Plan should be included in the EIS to address Clause 6.10 (Design Excellence) of the <i>GRLEP</i> .	VPA / Condition of Consent

25 February 2025

Matthew Di Maggio
Ethos Urban
Principal Planner
mdimaggio@ethosurban.com

Dear Mr Di Maggio

Scoping Proposal – 4-16 Montgomery Street, Kogarah

Thank you for submitting an updated Scoping Proposal in relation to 4-16 Montgomery Street, Kogarah (the site).

The Scoping Proposal seeks to amend the *Georges River Local Environmental Plan 2021* (GRLEP 2021) relating to the site as follows:

- **Land Use Zone** – Zone MU1 Mixed Use retained.
- **Height of Buildings Map** – Amend from 39m to a maximum height of 86m (RL 113.5).
- **Floor Space Ratio Map** – Amend from 4.5:1 to 7:1 (including at least 1:1 non-residential FSR).
- **Additional Permitted Uses** – Enable the permissibility of residential flat buildings (RFBs) along the site's Premier Street frontage.

The primary Council issues with the overall proposal that must be robustly justified are as follows:

- **Precinct Density** – The proposal seeks to significantly increase the density of the site through a 120.5% height and 55.5% FSR increase. It is acknowledged that Kogarah is identified as a Strategic Centre. Nonetheless, robust justification against the current strategic planning framework as well as an analysis of relevant comparable precincts in the region is required to determine the strategic merit of a future Planning Proposal.
- **Commercial vs Residential Floorspace** – The significant quantum of office space (31,389m² of NLA) occupied by Westpac currently is seen as a key anchor for the Kogarah Strategic Centre. It is acknowledged that there is

uncertainty around the current tenant beyond the 10-year horizon and the proposal seeks to adopt a 1:1 non-residential FSR. Nonetheless, for Kogarah to succeed and grow further as a key Strategic Centre in the region, a balanced approach is required in providing sufficient office and retail floorspace to support an increasing residential population. Council's most recent [Employment Projections](#) (June 2023) as well as TfNSW's Travel Zone Projections 2024 (TZP24) indicate a strong demand for commercial floor space within the Kogarah Strategic Centre. To this end, robust justification for an overall reduction in non-residential floor space is required.

- **Public Open Space** – As acknowledged within the Urban Design Report (UD Report), there is a “deficiency of public open space in and surrounding the Kogarah Town Centre”. The current proposal includes a 2,450sqm plaza and park which involves providing approximately 7% of the site area as deep soil. Council remains concerned that this provision is insufficient to meet the needs of the future residents and workers of the precinct, as well as those in proximity to the site.

The provision of safe, useable, green, and publicly accessible spaces is key for the success of not only the precinct, but the Kogarah Strategic Centre as a whole. As raised at multiple points in the past, Council welcomes early discussions to inform the provision of a Voluntary Planning Agreement (VPA). This is an essential mechanism required to assist in the delivery of infrastructure and facilities within the precinct and surrounding the site to support the increase in population and workforce.

The advice enclosed in this letter is to be read in conjunction with the comments previously provided by Council in letters dated 6 November 2023, 22 May 2024, and 9 July 2024. These are provided as **Attachment 1-3** respectively.

Urban Design

Height of Buildings / Height Transition

Comments were sought from Sydney Airport (**Attachment 4**). They stated that “*the height of the Obstacle Limitation Surface (OLS) for Sydney Airport over the site is 51m AHD. Any proposed development designed to be taller than 51m AHD, would*



be considered a controlled activity and be subject to the Federal Airports (Protection of Airspace) Regulations 1996.”

Based on the above, further investigation is required to determine the potential maximum building height that is achievable whilst maintaining airport safety. This remains to be one of the biggest constraints for the precinct as proposed in its current form.

Height Transitions

The UD Report states: *“One of the key drivers behind the configuration of the scheme and the location of height was to provide a built form outcome that gave interest, relief and variety to the new precinct”.*

Developments approved in recent years (under the old Kogarah LEP) have following maximum building heights that are unlikely to change in the near future:

- 22-24 Montgomery Street – 36.975m (excluding lift overrun) – LEC approved on 5-4-2019 (DA2018/0138)
- 32-38 Montgomery Street - 44.31m (including lift overrun LEC Approved - DA2018/0139; MOD2019/0245)

The proposal has an 86m high tower which is 48.45m higher than the approved development at No. 38 Montgomery Street and 50.175m higher than the approved development at No. 22-24 Montgomery Street (Refer **Figures 1 and 2**).

There is a current disconnect between the existing development and the proposed building heights. It is considered that the proposal is not a harmonious fit and compatible with the existing and planned context, nor does it enhance relationship with the lower-scale heritage building.

It is acknowledged that the proposal places buildings of varying heights across the site to provide variety and interesting skyline. However, it is considered that the cumulative effect of the proposed towers on the skyline, sunlight, comfort, and quality of the public realm is yet to be resolved.

Figure 1 and 2 below have been roughly drawn to demonstrate the transition in heights for the proposed development.



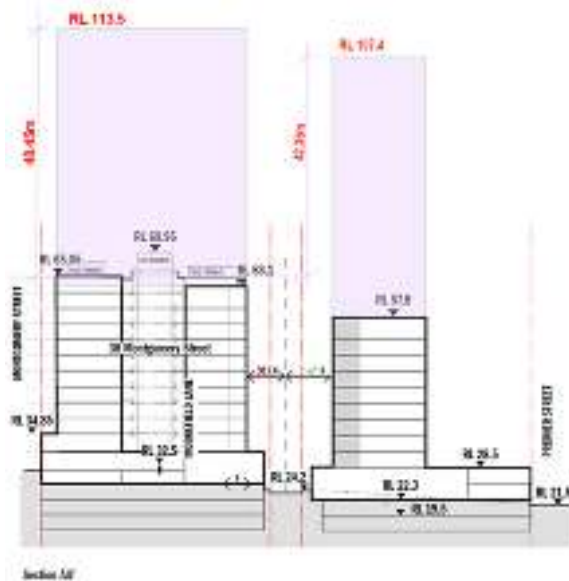


Figure 1 – Section with Proposed heights



Figure 2 – Sketch - Montgomery Street Elevation with the Proposed Built Form

The proposed building heights are not consistent with the Kogarah's distinctive identity and character that is required to be maintained under Part 8.1.3 of Georges River Development Control Plan (GRDCP) by ensuring that:

- *The village atmosphere is maintained and strengthened*
- *The human scale and people friendly environment is enhanced*
- *New buildings and streetscapes display a distinctive character,*
- *New development respects and enhances existing items of heritage*

As previously stated, the proposal does not provide appropriate transition to the Grace Chinese Christian Church (heritage Church). For the 8-storey building

adjacent to the heritage Church, the horizontal separation / distinction between the tower and the 2 storey podium is achieved by providing a modest setback to the 3rd storey. This does not provide an appropriate transition in scale.

As stated in previous comments, applying angular planes and appropriate building separation / setbacks and lowering the building heights should be considered to provide a better transition from the higher scale buildings to lower scale existing buildings.

Podium Heights and Podium and Upper-Level Setbacks

Premier Street

Council still has concerns in relation to the 0m street setback to the 8, 10, 14 and 20 storey towers, which alternate with the 2 storey podium containing a 12m average weighted upper level setback.

The UD Report states that the alternate 12m average weighted upper level setback provides greater relief and variation along the street compared with the GRDCP compliant scheme. Whilst this approach is acknowledged as an attempt to improve upon the existing controls, ultimately the 0m setback to the 4 towers varying in heights from 8 to 20 storeys is not consistent with the objective of achieving a human scale. The towers with 0m setback will also disrupt the streetscape rather than define it.

Additionally, the 0m street setback to the 4 towers will likely compromise amenity due to downward wind shear, limiting sky views, reducing landscaping opportunities, and possibly impeding solar access to private open space above the podium.

Moorefield Lane

The proposed 2m street setback to the podium will compromise the objectives under Part 8.1.5 of GRDCP (refer Figure 21– Building Alignment Plan), where the objective of the prescribed 3m setback is to provide greater amenity and create cohesive streetscapes. It is acknowledged that all vehicular traffic associated with the proposed development is proposed to utilise Premier Street (avoiding Moorefield Lane). However, Moorefield Lane provides vehicular access to the existing developments along Montgomery Street, including waste collection vehicles.

Given the current use of Moorefield Lane, the prescribed 3m setback would provide an opportunity to design a pedestrian friendly laneway.



The proposal provides 4m upper level setback (6m to the street and 9m to the centre of the laneway). The UD Report relies on the location of the circulation core on Moorefield Lane *elevation that assists in mitigating privacy between developments*. However, it should be noted that the entire laneway facades are not occupied by circulation cores; habitable rooms are also located along Moorefield Lane. The 6m building separation and the 6m setback to Moorefield Lane are constraints that will compromise the amenity of the future units.

As stated in previous comments, a minimum 6m upper level setback is preferred to enhance the amenity of current and future units and create a safe/desirable pedestrian environment within Moorefield Lane.

Montgomery Street

Concern is raised in relation to the proposed 2m setback above the podium given the heritage item in proximity and the 9.605m setback to the development above the heritage item (No. 22 – 24 Montgomery Street).

Tower Floorplates and Configurations / Separation

The proposed 975m² floor plates and 6m building separation remains a concern as stated in detail in previous comments. Building separation goes beyond ensuring visual privacy. Please refer to the comments made previously which remain relevant to the current proposal.

It is paramount that the development should be consistent with the following:

- **SEPP Housing 2021:**

Design Principle 1 - Context and Neighbourhood character requires new buildings to respond to and enhance the qualities and identity of an area including the adjacent sites, streetscape and neighbourhood.

Appropriate building separation will enhance a sense of openness, preserve visual scale and access to sky views that will offer relief from the built form. It will also avoid loss of amenity and ensure building fits within the planned context of the neighbourhood.

The development should also be consistent with other design principles which include; *Built Form and Scale, Density, Sustainability, Landscape, Amenity, Safety, Housing diversity and social interaction, and Aesthetics*.

- **GRLEP cl. 6.10 Design excellence** which aims to ensure developments deliver the highest standard of sustainable architecture and urban design.



The proposed concept design is to address the matters listed under Clause 6.10 (5).

Deep Soil / Landscaping

The project vision as established in the UD Report states: *“The master plan proposes to deliver over 5,400 sqm of new public realm - approximately 40% of the site area. As part of this public benefit offer, a 2,450 sqm new town centre and park is proposed to create a vibrant heart for the Kogarah community.”*

One of the 10 Key Principles is “A Nature Positive Place”. This Principle states that *“the proposed extents of landscape amenity will help address the current significant deficit of green spaces in the town centre, and in doing so will also help to reduce the effects of the urban heat island, and bring more nature - birds, bees and bugs - back into our environment.”*

It should be noted that deep soil is proposed only in the northern corner around of the site and measures around 1,000m² (site area 13,035m² – proposed deep soil 7.6%). As previously stated, the ADG recommends 15% of the site area as deep soil landscaping for larger sites such as this one.

Given the 0m setback to Premier Street, the proposed landscaping along Premier Street appears to be on Council land. The proposed 2m setback along the Laneway with structures below provides limited opportunity for meaningful landscaping.

It is acknowledged that extensive landscaping is provided on site, which is encouraging. However, the majority of it is on structures, which come with notable challenges including higher initial costs, ongoing maintenance challenges, and water demand in dry climates. Unlike deep soil, planting on structures has limitations. Notably, large trees cannot be planted on structures and the majority of the proposed landscaping will have a limited lifespan in comparison to traditional planting in deep soil.

As previously stated, increasing the proposed deep soil from 7.6% to 15% should be considered. Especially, due to the current lack of open space within the Kogarah centre.

Overshadowing

Figures on Page 97, Section 6.8 of the UD Report demonstrate that the proposal has significant impact on access to direct sunlight for the adjoining developments along Montgomery Street. Further measures to mitigate this impact are required as the concept scheme is refined.



Solar Access - Units

Page 94 of the UD Report has solar access to the southeast facade of the 2 northern towers, which appears to be inconsistent with the 3D solar analysis diagrams on the same page. More detailed should be provided in support of the proposed concept, including sun eye diagrams.

Section 6.5 of UD Report provides an ADG compliance summary. Regarding cross ventilation, the proposal only achieves the minimum required. In accordance with previous comments in relation to floorplate sizes, an improvement in cross ventilation is requested.

Building Services

There is no mention of any of the building services in the UD Report. As stated in previous comments, the location of building services, especially substations, should be identified at this stage given its significant impact on the streetscape. Locating building services such as waste collection, gas, water and electrical meters in the basement is requested.

Public Art

Given the scale of the proposal, the provision of public art is expected in accordance with a precinct Public Art Strategy prepared by a suitably qualified consultant.

Traffic Impact Assessment

It is considered the following intersections will be impacted by the proposal and will need to be included in traffic modelling:

The signalised intersection of Regent Street and the Princes Highway

This intersection is likely to be the intersection at which southbound drivers on the highway will turn to the right/ to the west off the Highway to travel to the site. It is suggested that it is considered in a future revision of the Traffic Analysis.

The intersection to the north at Harrow Road where a right turn is permitted off the Princes Highway is the Harrow Road signalised intersection. However, drivers turning at this intersection results in them having to travel a circuitous route to reach the site and hence it is considered likely to be the lesser of the two intersections utilised.



The next intersection to the south of Regent Street where drivers are permitted to carry out a right turn of the Highway is the signalised intersection of the Princes Highway and Jubilee Avenue. The intersection is some 1.5km south of Regent Street and well past the site and hence unlikely to be used to access the site. Again, it is a circuitous route to travel back to the site from this intersection.

The signalised intersection of the Princes Highway and South Street and unsignalised intersection of South Street and Montgomery Street.

Both intersections are used by drivers in the AM and PM peaks to exit the Kogarah Town Centre to turn left/north and right/south onto the Princes Highway. It is suggested that both intersections are considered in a future revision of the Traffic Analysis.

The left turn is used by drivers to access the intersection of the Princes Highway and President Avenue a short distance to the north at which to turn off the Highway to travel to the east.

Those turning to the right onto the Princes Highway either stay on the Highway and travel to the south or branch to the left onto Rocky Point Road, the road used by thousands of drivers a day to access the Sutherland Shire.

Both intersections already experience significant delays in the PM peak with eastbound drivers in South Street queuing well back past and frequently blocking the Montgomery Street/South Street intersection.

Moorfield Lane/Kensington Street Intersection

The documents show at various sectional drawings that the boundary to boundary and carriageway width along a majority of Moorfield Lane is to be increased to provide for full two-way operation and provide footpaths on both sides.

The carriageway width is assessed as being increased from the current standard width of 4.9m to approximately 6m.

The laneway however cannot be widened at its south-eastern/Kensington Street end as properties on the south-western side of the lane fronting Montgomery Street (No's 44, 46 and 50) and on the north-eastern corner (No. 1 Kensington Street) are not included in the proposal.

The proposal with 802 units and increase in retail and commercial activity will very likely lead to an increase in the number of vehicles travelling into and out of Moorfield Lane from Kensington Street, particularly a possible increase in the number of heavy/service vehicles, and an increase in the number of pedestrians using the footpath. Concern is raised regarding an increase in the potential for



conflict to occur between drivers turning into and out of Moorfield Lane and pedestrians walking along the Kensington Street footpath and stepping onto the lane carriageway.

There are also ongoing issues with traffic congestion occurring on Kensington Street in both directions when drivers of vehicles, particularly service vehicles, are unable to enter Moorfield Lane when another vehicle, whether it be a light or heavy vehicle, is exiting the lane.

It is not uncommon for vehicles travelling in a north-easterly direction on Kensington Street to queue back to and beyond the Kensington Street/Montgomery Street signalised intersection when unable to pass a heavy vehicle turning left into Moorfield Lane.

The SIDRA intersection analysis carried out by traffic consultant, ptc, shows the signalised intersection will have a reduction in level of service to level "C" in the 5 and 10 year scenarios. It is requested that the operation of the intersection be further investigated.

Closing Moorfield Lane to vehicle entry/exit at Kensington Street will reduce the issue of vehicle queuing on Kensington Street. However, property No's 44,46 and 50 Montgomery Street and No. 1 Kensington Street have their waste and recyclables collected from the lane. Closing the lane will impact the collection and the matter will need to be further investigated as part of the Planning Proposal.

Having regard to the above and to point 4 below, it is recommended that consideration be given an alternate vehicle access to and from the site as shown in principle in the image below. This could include reallocating the currently proposed north-west access to within the Laneway itself.



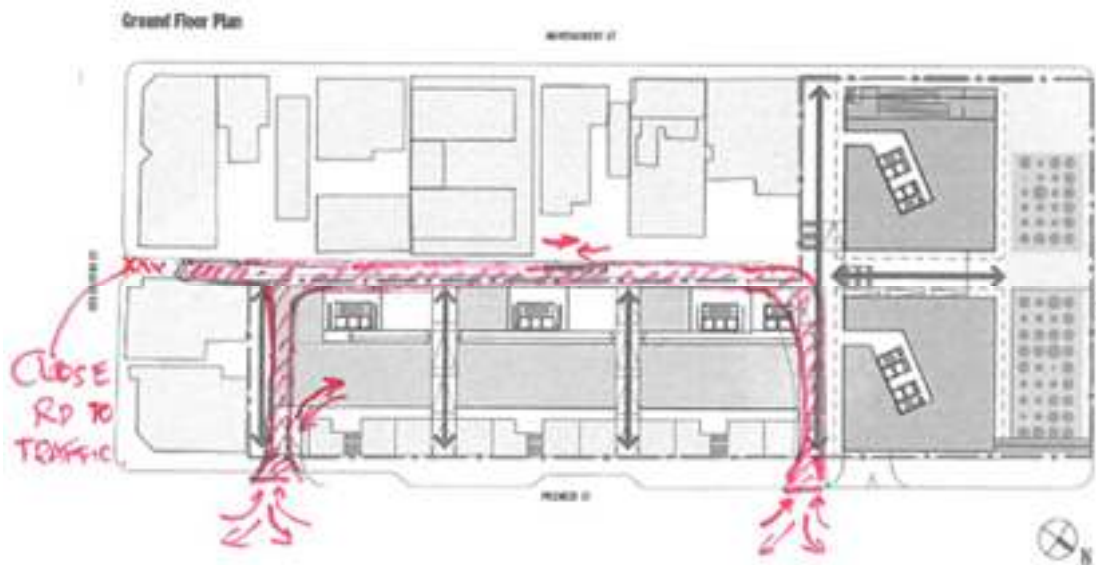


Figure 3 – Sketch of possible alternate access arrangements for Moorfield Lane

The proposed widening of the road reserve and carriageway in Moorfield Lane to make it two way will result in part of the carriageway being in the ownership of Council and part not owned by Council.

The ownership of the laneway will need to be the subject of discussions with Council.

Moorfield Lane – north-western dead end

The north-western/dead end of Moorfield Lane will need to be provided with a cul-de-sac/turning bowl to cater for the turning of the largest design service vehicle in one movement should there be no changes proposed to vehicular access.

Premier Street – points of vehicle access

The UD Report proposes all vehicle access to and from the site to be achieved from two locations on Premier Street.

One access point is proposed at the south-east (Kensington Street) end of the site which will cater for all vehicle movements into and out of the basement areas associated with the residential component of the development. The other access point to the north-west of the site near Post Office Lane will cater for all vehicle movements into and out of off street parking associated with the retail and commercial components.

Vehicle access to the north-west.

This proposal shows provision being made for a two-vehicle wide (6m approximately) footpath crossing facility catering for entry/exit movements of retail and commercial component vehicles and immediately alongside it, a vehicle crossing of similar width catering for heavy vehicles entering and exiting the loading dock associated with the full-line supermarket.

The proposal for the two crossing facilities to be side by side is not supported on pedestrian safety grounds.

The proposal will result in pedestrians walking along the Premier Street footpath, which will increase in number as a result of the development, having to travel across some 12m of driveway area involving a large number of light and heavy vehicle movements.

It is considered the access points should be separated or be combined into one 6m crossing.

Having regard to the large number of vehicles that will be crossing the footpath area in both peak and off peak periods, particularly from the off street retail and commercial car parking area, any Planning Proposal submitted to Council will need to provide advice from a suitably qualified and experienced Traffic Engineering professional that:

- Indicates the type of treatment required at the intersection of vehicle entry/exit points and the Premier Street roadway to provide for the safe and efficient movement of pedestrians and vehicles.
- Shows the undertaking and results of a queuing analysis to confirm queue lengths from carpark entry control points will not extend out of the site and onto Council's road reserve.

Vehicle access to south-east

The proposal shows provision being made for a two-vehicle wide (6m approximately) footpath crossing facility catering for vehicle movements into and out of the site associated with the residential component. The same advice as described above for the north-west vehicle access will be required for this south-east access point.

Service Vehicles

A Planning Proposal will need to provide advice as to how and where waste, recyclables and bulky goods will be stored and removed from the residential, retail and commercial components.



Facilities for the removal of waste and recyclables etc., shall be provided on site and designed:

- In accordance with AS 2890.2: 2018 Parking Facilities, Part 2 – off street commercial vehicle parking.
- To cater for entry to and exit from the site in a forward direction of Council's waste contractor trucks.

Bicycle – provision and storage

As provision will need to be made for the secure storage and parking of some 400 plus bicycles for the various components of the development potentially occupying significant floor areas in basement car parks. The Planning Proposal will need to provide advice as to how parking for bicycles will be provided to satisfy the requirements of GRDCP2021 and AS 2890.3: 2015 – Parking Facilities, Part 3 – bicycle parking.

Through site links

It is understood the through site links will be arcades. Such links will therefore be unsuitable for use by cyclists and possibly closed off at night for safety and security reasons. It is suggested that these through site links are designed to be used safely in both daylight and nighttime hours to improve the permeability of the precinct.

Car parking rates

It is considered a site specific DCP should be developed for the provision of carparking with a proviso that every residential unit in the development be allocated at least one (1) off-street car parking space.

Transport for NSW comments

TfNSW have requested a transport and accessibility impact assessment which includes, but is not limited to the following:

- An assessment of the predicted impacts of traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity.

Traffic Analysis prepared by PTC appears to indicate that the Base Case and Planning Proposal schemes will have minimal impact on the road network,



however it stated that the Level of Service at the intersection of Montgomery Street and Kensington Street will be impacted in 5 and 10-year scenarios, indicating some mitigation measures may be required. It is recommended that this be further investigated in the traffic impact assessment to support the planning proposal.

- The Regent Street and Princes Highway signalised intersection needs to be included in the modelling.
- The assessment should be undertaken for AM, PM and weekend peaks and outline any required road upgrades as a result of the development yield (if required).
- Future traffic trip generation, in accordance with the latest Guide to Transport Impact Assessment (TfNSW, Nov 2024) and associated surveys.
- The assessment should also consider distribution of trip generation to and from the site to the surrounding road network based on proposed access strategy and travel patterns.
- The adopted background growth factor of 1% may vary from actual growth forecasts noting that Kogarah has been identified as a TOD location. Growth rates obtained from an appropriate strategic model should be used for background traffic through trips.
- Details of the proposed development, including pedestrian and vehicular access arrangements as well as parking and servicing provision.
- Swept path diagrams depicting vehicles entering, exiting, and manoeuvring throughout the site.
- Details of key road infrastructure, active transport and public transport improvements required to support the proposed development.
- Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and measures to integrate the development with the existing/future public transport network.

TfNSW's full response is provided at **Attachment 5**.

Heritage

It is recommended that any progression of the Planning Proposal is undertaken in consultation with a suitably qualified and experienced heritage consultant, having regard to the identified significance of the identified heritage items within the vicinity of the site.



The heritage consultant should provide further advice to guide suitable massing envelopes, ensuring appropriate setbacks and design principles are incorporated to guide future development of the site. Previous comments and those raised in the Urban Design section of this letter should be addressed through this process.

Impacts and demands on local infrastructure – Voluntary Planning Agreement

As specified in Council's letters dated 6 November 2023, 22 May 2024 and 9 July 2024, the provision of a Voluntary Planning Agreement (VPA) in conjunction with the Planning Proposal is considered an essential mechanism to assist in the delivery of infrastructure and facilities required to support the increase in population.

Required Documentation for a Planning Proposal (minimum)

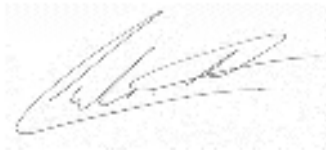
- Assessment of the Planning Proposal's strategic and site specific merit (as per the DPE's *LEP Making Guideline*), including assessment against the *Greater Sydney Region Plan – A Metropolis of Three Cities*, *South District Plan*, *Georges River Local Strategic Planning Statement (LSPS) 2040*, *Georges River Commercial Centres Strategy Part 1*, and *Kogarah Place Strategy*.
- Urban design analysis.
- Public domain and landscape plan.
- Heritage impact assessment.
- Traffic and parking impact assessment.
- Solar access analysis.
- Wind assessment.
- View analysis.
- Social impact assessment.
- Economic impact assessment.
- Draft site specific DCP amendment.
- VPA offer.
- Site survey plan.

Council has sent referrals to the Department of Education, Sydney Water, and the South Eastern Sydney Local Health District but has not yet received any responses. Any comments received will be forwarded accordingly.



Should you require any further information, please contact Ms Michelle Fawcett, Strategic Planner on 9330 9469.

Yours sincerely



Luke Oste
Coordinator Strategic Planning

Attachments

1. Letter dated 6 November 2023
2. Letter dated 22 May 2024
3. Letter dated 9 July 2024
4. Sydney Airport Comments
5. TfNSW Comments

9 July 2024

Matthew Di Maggio
Ethos Urban
Principal Planner
mdimaggio@ethosurban.com

Dear Mr Di Maggio

Preliminary Planning Proposal – 4-16 Montgomery Street, Kogarah

Thank you for providing Council with the presentation on 11 June 2024 of the updated preliminary Planning Proposal for 4-16 Montgomery Street, Kogarah. As requested, please find comments from Council officers on the preliminary Planning Proposal to assist you prior to lodgement of a formal pre-Planning Proposal should you wish to proceed.

We understand the proposal seeks the following:

- Mixed use development;
- Heights of 3 storeys to 26 storeys; and
- FSR 7:1.

It is noted that the amended concept has addressed some of Council's concerns raised on the previous concept dated May 2024 and provided in Council's letter dated 22 May 2024. However, many of the significant concerns raised previously have not been addressed and are discussed below. Council's letters dated 6 November 2023 and 22 May 2024 should be read in conjunction with this letter.

Height of Buildings / Height Transition

Whilst it is noted that you have consulted with the relevant airport authorities with respect to the proposed heights, no strategic justification has been provided for the proposed heights and FSR, particularly in the absence of a Council endorsed strategic study or Master Plan.

Heights and Relationship to Grace Chinese Christian Church Heritage Item

Whilst it is recognised that the maximum height of the proposal has been reduced from 28 storeys to 26 storeys, some of the buildings have increased in height and Council's recommendations provided on 22 May 2024 regarding height transition and setbacks from the heritage items remain relevant. The tower heights adjacent to the existing heritage items do not provide appropriate transition in scale down to the lower-scaled buildings. The proposed heights lack integration with the height, scale and character of the existing context and cannot be supported.

The Design Report provided states that *the proposed development is not out of context to surrounding existing developments*. In support of this statement, the Design Report provides the following surrounding developments:

- No. 1 Kensington Street, Kogarah (west of Grace Chinese Christian Church) - 7 storey mixed use building - Approved in 2002
- No. 8-12 Kensington Street, Kogarah (south of Grace Chinese Christian Church) - 7 storey mixed use building - Approved in 2009
- No.22 Montgomery Street, Kogarah (DA2018/0138) - 10-11 storey mixed use building – Local Environment Court (LEC) Approved in 2019

It should be noted that the above developments were approved under the former Kogarah LEP and DCP. In addition, approved past developments may not represent an example of good urban design and should not be a precedent for future developments. Every site is different, and approvals should be based on merit and not on precedents.

The *Georges River LEP (GRLEP) 2021* was gazetted in October 2021, which includes Clause 6.10 Design Excellence. The objective of the clause is to deliver the highest standard of sustainable architecture and urban design and requires the following:

(4) Development consent must not be granted for development to which this clause applies unless the consent authority considers that the development exhibits design excellence.

In considering whether a development exhibits design excellence, the GRLEP requires developments to address matters, which are listed under Clause 6.10 (5).

A 9 storey wall height and 6m separation from the heritage item is not considered an appropriate transition (refer to the diagram below extracted from the Design Report). The 9 storey wall height is also not considered to be attuned to the human scale especially given the context. The proposal only provides a material step change to distinguish between the podium and tower. This is considered cosmetic as it does not provide transition in scale or deliver any amenity benefits.





Podium Heights and Setbacks

Premier Street

Except for the alignment and increase in the size of the footprints of the towers at the Post Office Lane end (from 21m to 23m), the built form structure plan has been maintained from the original plans lodged in November 2023.

The Design Report seeks to vary the upper level setback for all the towers above the podium from 6m to 0m. The Design report states: *the DCP compliant 6m setback would result in a monolithic street wall along Premier Street. Setting the towers away from Premier Street allows for a more generous average setback, providing a more interesting presentation to the street and visual relief.*

The variation will result in 9, 12, 15 and 20 storey towers with 0m setback to Premier Street which is considered undesirable. It is acknowledged that generally staggering towers does create an interesting streetscape and skyline. However, towers of 9 storeys and greater with no setback create poor amenity with no pedestrian scale provided at the ground level and limited solar access. These towers are to provide an upper level setback to reduce visual and physical impacts of the towers and allow the base building to be the primary defining element for the site and surrounding heritage items. Above the podiums, the towers could be staggered to create a more interesting form and streetscape; however while still maintaining an upper level setback.

As stated in Council's letter dated 22 May 2024, the 2-3 storey podium along Premier Street should wrap around to present a podium height sympathetic to the heritage item. The 2 storey podium along Moorefield Lane should also be taken into



consideration while the built form above the podium should be setback further (minimum 6m). This will provide an intimate scale and the setback above will provide appropriate transition in scale, enhance the streetscape and amenity.

Moorefield Lane at 38 Montgomery Street

The Design Report states the following: *Proposed setbacks above podium are more generous than those approved at 38 Montgomery St.*

As discussed above under Heights and Relationship to Grace Chinese Christian Church Heritage Item, existing developments were approved under the former Kogarah LEP and DCP. Approved past developments may not represent an example of good urban design and should not be a precedent for future developments.

The Design Report includes a visual comparison between the proposed 4m and recommended 6m upper level setback. However, this is not considered an accurate visualisation of the entire laneway (138m long). A 2 storey podium and 6m upper level setback with appropriate shadows has not been provided. It should be noted that a 6m setback provides a more generous space for landscaping/communal open space above the podium.

Laneways Typologies

The Design Report provides examples of laneway typologies and includes Little Queen Street, Melbourne; Angel Place, Sydney; and Quay Quarter Lane, Sydney.

It is acknowledged that the above examples are some of the most used and successful spaces. However, it should be noted that it is a very different context; especially considering that the Sydney Central Business District (CBD) laneways and the surrounding built form is a result of historic subdivision pattern, which still retains some of the sandstone buildings constructed in the mid-late 1800's and early 1900's.

An 1854 map of Sydney reveals a complex matrix of small scaled lanes, arcades, passageways and courtyards, juxtaposed against the major CBD streets. By 1980, most of these spaces had been slowly erased, to maximise the building area (The City of Sydney Policy for the Management of Laneways in Central Sydney, 1993). The laneways had predominantly become dead spaces; until 2007 when City of Sydney first unveiled a laneways program and since then, numerous laneways have been revitalised within the existing framework/built form with bars, restaurants, retail outlets and acclaimed art installations to enhance connectivity, accommodate growing pedestrian numbers, relieve pressure on the limited public open spaces and prop-up the Sydney/NSW economy.



A considerable amount of money has been invested by both the State Government and Council in the transformation of the Sydney CBD laneways for them to be a success. It is unlikely that investments to a similar scale are likely to occur for Moorefield Lane. Hence, the intention in this instance is to achieve design excellence from the outset without compromising amenity and providing a pedestrian friendly, lively, and engaging space. To maximise solar penetration, minimise down draught and enhance human scale, a 2 storey podium and upper level setbacks have been recommended, which are more appropriate to the context.

Floor Plate Configuration

The justification provided in the Design Report for the proposed tower footprints, which are larger than Council's preferred 750m² tower floor plates, includes precedents with floor plates ranging between 930m² – 1,355m². It is considered that the 1,355m² Harbourside floor plate with a long narrow corridor and a single window presents no opportunity for casual interaction, with single aspect units and a lack of articulation which is not considered achieving design excellence.

As stated in Council's comments dated 22 May 2024, variation to Council's preference for a maximum 750m² tower floor plate will only be taken into consideration subject to its impacts and achieving design excellence. However, floor plates wider than 18m-20m would not be supported.

As stated in Council's comments dated 22 May 2024, the proposed 6m building separations resulting in tall blank walls and the large floor plates impacting amenity are not supported. Council's previous correspondence also outlined the merits of providing separation more than the minimum required to minimise large spans of blank, unarticulated facades and building bulk as well as achieving overall design excellence.

Council referred to *Better Placed*, (Government Architect NSW) which expects built environments to be designed for people and communities. Building separation is not just about visual/acoustic privacy but also about amenity (solar access, public domain, landscaping, deep soil) and the broader context as it contributes to the character of the area, skyline, protects sky views and provides visual relief from high density and compactness.

Deep Soil / Landscaping

Around 930m² (7% of the site area - 13,072m²) of deep soil is provided in the northern corner of the site. For sites greater than 1,500m² in area, the Apartment Design Guide (ADG) recommends providing 15% of the site area as deep soil.



It is acknowledged that the proposal includes public open space. However, only the minimum required deep soil is provided. It is recommended that more than 7% deep soil should be provided given the scale of the development to soften the visual bulk, provide a visual buffer, enhance the tree canopy and mitigate the urban heat island effect.

As requested in Council's comments dated 22 May 2024, no details on how the public open space area is proposed to be utilised has been provided. Sectional plans should be supplied to facilitate understanding of the proportion of the proposed development and the human scale and suitability of the open space.

The rear setback (existing at grade parking) of the heritage item at No.24-28 Montgomery Street provides an opportunity to be developed as a pocket park as stated in Council's comments dated 22 May 2024.

Permeability

As stated in Council's comments dated 22 May 2024, the 6m wide through site link in proximity to Kensington Street, and the 2 x 6m wide arcades between Premier Street and Moorefield Lane are considered undesirable and should be greater than 6m wide.

Non-Residential Floor Space and Active Street Frontage

With consideration to Council's *Commercial Centres Strategy Part 1* and GRLEP, a minimum non-residential FSR of 1:1 should be provided on the ground floor and first floor with the ground floor to be active.

Comments on building services in Council's letter dated 22 May 2024 have not been taken into consideration. It is acknowledged that this is only a Planning Proposal; however, location of building services especially substations should be considered given their impact on the streetscape and built form.

Traffic (Moorefield Lane)

In response to the traffic information provided in the Design Report on Moorefield Lane, Council's traffic engineers have provided the following comments:

- Pedestrian only links shown in the Design Report are considered acceptable with appropriate signage, pavement material and bollards.
- Moorefield Lane is to be an adequate road width and shall be provided for two-way traffic movement with no parking permitted along the laneway to accommodate the two-way movement.

- All loading and unloading, including waste collection, shall be provided within the site and driveway widths are to accommodate delivery and service vehicles.
- An adequate footpath width shall be provided along Moorefield Lane to accommodate future pedestrian demand.
- Moorefield Lane as a dead end/cul-de-sac shall be designed to allow for a U-turn movement for standard vehicles.

Impacts and demands on local infrastructure – Voluntary Planning Agreement

As specified in Council's letters dated 6 November 2023 and 22 May 2024, the provision of a Voluntary Planning Agreement (VPA) in conjunction with the Planning Proposal is considered an essential mechanism to assist in the delivery of infrastructure and facilities required to support the increase in population.

Required Documentation for a Planning Proposal (minimum)

- Assessment of the Planning Proposal's strategic and site specific merit (as per the DPE's *LEP Making Guideline*), including assessment against the *Greater Sydney Region Plan – A Metropolis of Three Cities*, *South District Plan*, *Georges River Local Strategic Planning Statement (LSPS) 2040*, *Georges River Commercial Centres Strategy Part 1*, and *Kogarah Place Strategy*.
- Urban design analysis.
- Public domain and landscape plan.
- Heritage impact assessment.
- Traffic and parking impact assessment.
- Solar access analysis.
- Wind assessment.
- View analysis.
- Social impact assessment.
- Economic impact assessment.
- Draft site specific DCP amendment.
- VPA offer.
- Site survey plan.

A formal pre-lodgement Planning Proposal that includes the main documents listed above is encouraged to be submitted prior to the lodgement of a Planning Proposal. A pre-lodgement meeting request form is available on Council's website at <https://www.georgesriver.nsw.gov.au/Development/Planning-Controls/Planning-Proposals>.



Should you require any further information, please contact Ms Catherine McMahon, Council's Manager Strategic Planning on 9330 6260.

Yours faithfully



Catherine McMahon
Manager Strategic Planning



22 May 2024

Matthew Di Maggio
Ethos Urban
Principal Planner
mdimaggio@ethosurban.com

Dear Mr Di Maggio

Preliminary Planning Proposal – 4-16 Montgomery Street, Kogarah

Thank you for meeting with Council officers on 6 May 2024 to discuss your updated preliminary Planning Proposal for 4-16 Montgomery Street, Kogarah received 3 May 2024. As requested, please find comments from Council officers on the preliminary Planning Proposal to assist you prior to lodgement of a formal pre-Planning Proposal should you wish to proceed.

We understand the proposal seeks the following:

- Mixed use development;
- Heights of 3 storeys to 28 storeys; and
- FSR 5:1.

It is noted that the amended concept has considered some of Council's concerns raised on the previous concept dated September 2023 and provided in the letter dated 6 November 2023. However, some of the significant concerns raised previously have not been addressed and are discussed below. Council's letter dated 6 November 2023 should be read in conjunction with this letter.

Height of Buildings / Height Transition

Strategic justification needs to be provided for the floor space ratio (FSR) and heights proposed in the Planning Proposal, particularly in the absence of a Council endorsed strategic study or Master Plan.

A survey plan is required to be submitted to determine heights for the site in relation to the airport height limits. It is recommended that you consult with the relevant airport authorities with respect to the proposed heights.

Consideration to the existing context and provision of appropriate transition in scale and height, especially to the existing heritage items and Moorefield Lane was recommended in Council's letter dated 6 November 2023. It is considered that an effort has been made to an extent to address transition; however, the proposed building heights adjacent to existing heritage items is still considered inadequate as follows:

- 8 storey wall height adjacent to the 2-3 storey heritage item on the corner of Premier Street and Kensington Street (Grace Chinese Christian Church); and
- 25 and 11 storey towers to the north of the heritage item along Montgomery Street (i.e. No.24-28 Montgomery Street).

The above tower heights adjacent to the existing heritage items do not provide appropriate transition in scale down to the lower-scaled buildings. The proposed heights lack integration with the height, scale and character of the existing context and cannot be supported.

The proposal should take the below *Georges River Development Control Plan (GRDCP) 2021* requirement into consideration given its impact on the built form, structure and density.

Part 8.1.4 (3) (3) of GRDCP: The heritage buildings at 22-28 Montgomery Street which are opposite the Courthouse are to be retained and any taller development set back 15m from the street frontage. Structures forward of 15m may be considered by Council only if they are shown to protect the heritage and enhance the urban design quality of the street. In any case, no higher structure should be allowed forward of 9.3 metres. In relation to such structures, applicants shall be required to show how both external and internal heritage features are protected by the design.

As recommended in Council's previous comments dated 6 November 2023, applying angular planes, providing appropriate horizontal separation distances, building setbacks and step backs, should be considered to transition from tall buildings down to lower-scale buildings and to maintain access to sunlight and skyviews for surrounding streets, public and private open space, and neighbouring properties, and reinforce the broader city structure.

Podium Heights

Montgomery Street

Council notes that the proposed 4 storey street wall / podium is as Council recommended on 6 November 2023.



Premier Street

It is noted that the proposal includes an 8 storey street wall / podium alternating with 2-3 storey street wall / podium along Premier Street.

A 2-3 storey podium along Premier Street is considered appropriate, subject to an appropriate height transition to the heritage item. Podiums greater than 4 storeys cannot be supported as the site adjoins low scale heritage items.

Moorefield Lane

Council notes that the proposed 2 storey street wall / podium is as Council recommended on 6 November 2023.

Moorefield Lane Setbacks

The GRDCP prescribes a minimum 3m setback for buildings with heights greater than 4m.

The proposed 2m and 3m upper level setback above the 2 storey podium along Moorefield Lane is not supported especially given the physical and visual connection Moorefield Lane provides to the proposed Town Square and the vision to improve the pedestrian experience and ground level activation. Amenity impacts (solar penetration, down draft) and human scale should be some of the major considerations.

To enhance human scale and amenity, the upper level setback should be a minimum of 6m. It should be noted that a 6m upper level setback is still a variation to the current GRDCP controls; in Business Precincts, the GRDCP prescribes a minimum 8m setback (including balconies, terraces and balustrade).

Premier Street

The proposed 3m upper level setback above the 4 storey podium along Premier Street is not supported.

As stated above, a minimum 6m upper level setback is considered appropriate with an appropriate transition in height and scale to the heritage item. The location of the towers above the podium could be staggered to create a more interesting street wall and massing composition.

Tower Floorplates and Configurations / Separation



As stated in Council's letter dated 6 November 2023, Council's preference is for a maximum 750m² tower floor plate to maximise access to sunlight and skyviews. The proposal includes a 28 storey tower with an 800m² floor plate and a 20 storey tower with an 890m² floor plate. These proposed floor plate areas are considered excessive and are of concern.

A maximum building depth of 18m (glass line to glass line) is recommended in the Apartment Design Guide (ADG) to ensure apartments receive adequate daylight and natural ventilation and optimise natural cross ventilation. It appears that the depth of most of the towers is more than 18m. Any variation to the 18m maximum building depth will need to be considered based on its impacts and achievement of design excellence and amenity.

As recommended in Council's previous letter dated 6 November 2023, the preference is for scattered slim towers with smaller floorplates throughout the site, but coordinated with other towers to create visual interest, maximise access to sunlight and skyviews and minimise the impact of shadows and the wind tunnel effect above the podium and the pedestrian environment.

Along Premier Street, the proposal provides a 6m building separation, including to the heritage item.

The Concept Plan states that the separation distances respond to ADG requirements for visual privacy and solar access. However, building separation is not just about visual privacy. The proposal includes numerous blank walls varying in heights from 28 storeys to 11 storeys. This is not considered a good urban design outcome as the very tall blank walls will enhance the bulk and scale, will be overbearing and lack visual interest.

Better Placed (Government Architect NSW), which advocates for good design outlines an integrated design-led approach to enhance all aspects of the urban environment, to create better places, spaces and buildings and thereby better cities, towns and suburbs. It includes seven objectives, which define the key considerations in the design of the built environment as follows:

- Better fit: contextual, local and of its place
- Better performance: sustainable, adaptable and durable
- Better for community: inclusive, connected and diverse
- Better for people: safe, comfortable and liveable
- Better working: functional, efficient and fit for purpose
- Better value: creating and adding value
- Better look and feel: engaging, inviting and attractive



In the *Georges River Local Environmental Plan (GRLEP) 2021*, the objective of Clause 6.10 Design Excellence is to deliver the highest standard of sustainable architecture and urban design. Appropriate building separation will enhance a sense of openness, preserve visual scale and access to skyviews that will offer relief from the built form / densification, in addition to improving amenity to the apartments and public domain. These considerations all contribute towards achieving a good design outcome and design excellence.

The ADG recommends a minimum 24m building separation between habitable rooms/balconies for buildings nine storeys and above. While numerous studies in the UK and Canada recommend a minimum 25m separation between buildings 8 storeys and higher. A generous building separation will avoid the tall blank walls, provide opportunity to incorporate windows / balconies on side elevations to enhance solar access and natural ventilation, create more interesting elevations, minimise bulk and scale, as well as enhance amenity of the public domain.

The proposed 6m building separations resulting in tall blank walls and the large floor plates impacting amenity are not supported.

Deep Soil / Landscaping

Landscaping, especially deep soil planting to accommodate mature trees should be provided throughout the site and not just within the Town Square. Details of basement parking has not been provided, which may compromise deep soil. In addition, details should be provided of the public/ private domain interface treatment especially along Premier Street, which appears to spill into the street carriageway.

The proposal indicates approximately 30% of the site area being dedicated to public open space but unfortunately, no details on how the area will be utilised. Sectional plans should be supplied to facilitate understanding of the proportion of the proposed development and the human scale and suitability of the open space.

As stated above, appropriate building separation should be provided to allow solar penetration to private / public open spaces and the public domain.

As recommended in Council's letter dated 6 November 2023, the proposed open space is to have high amenity and quality by providing:

- Deep soil open space to allow the provision of tree canopies;
- Greater solar access; and
- The inclusion of a variety of elements encouraging inclusive use for all ages.

A publicly accessible green open space area in the centre of the site should be considered to increase permeability, building separation and open space. The rear



setback (existing at grade parking) of the heritage item at No.24-28 Montgomery Street provides an opportunity to be developed as a pocket park as indicated on the proposed Concept Plan (Height Locations). Lack of appropriate building heights and separation will result in overshadowing of that space. Note: Existing parking associated with No. 24-28 Montgomery Street could be accommodated within the basement associated with the proposed development. Views and sections should be provided from all critical locations at the Planning Proposal stage.

Permeability

It is noted that the proposal includes a 6m wide through site link in proximity to Kensington Street, and 2 x 6m wide arcades between Premier Street and Moorefield Lane on either side of the 11 storey tower (centrally located). The proposed 6m width is considered undesirable, especially considering the 45m length of the buildings. The through site links should be amended to:

- Be greater than 6m wide;
- Be clear, devoid of any building services or obstructions;
- Provide vertical proportions with a height greater than the width;
- Be a minimum of 2 storeys in height for arcades; and
- Provide activated arcades (blank walls that reduce safety and usability should be avoided).

Non-Residential Floor Space and Active Street Frontage

With consideration to Council's *Commercial Centres Strategy Part 1* and GRLEP, a minimum non-residential FSR of 1:1 should be provided on the ground floor and first floor with the ground floor to be active.

Building services should be located to minimise the impact on pedestrian circulation and public domain in general. The location of building services, such as substations and waste collection areas, should be identified at the concept stage as it has an impact on the public domain.

Traffic (Moorefield Lane)

To activate Moorefield Lane, it is recommended to address the following traffic issues:

- The provision of a one-way lane;
- Shared zone subject to satisfying TfNSW criteria and approval from TfNSW;
- Minimum footpath width one side of the road that allows a wheelchair/pram to pass each other;
- Swept path analysis to demonstrate service vehicles/emergency vehicles can access from Kensington Street and Moorefield Lane; and



- Commercial and residential vehicle in and out movement to/from the driveway into Moorefield Lane.

Impacts and demands on local infrastructure – Voluntary Planning Agreement

The proposal will result in a significant increase in the number of residents and workers on the site. This will generate direct impacts and demand on local infrastructure and community facilities, including road and traffic facilities, transport facilities, open space and recreational facilities, public domain and community facilities.

As specified in Council's letter dated 6 November 2023, the provision of a Voluntary Planning Agreement (VPA) in conjunction with the Planning Proposal is considered an essential mechanism to assist in the delivery of infrastructure and facilities required to support the increase in population.

Required Documentation for a Planning Proposal (minimum)

- Assessment of the Planning Proposal's strategic and site specific merit (as per the DPE's *LEP Making Guideline*), including assessment against the *Greater Sydney Region Plan – A Metropolis of Three Cities*, *South District Plan*, *Georges River Local Strategic Planning Statement (LSPS) 2040*, *Georges River Commercial Centres Strategy Part 1*, and *Kogarah Place Strategy*.
- Urban design analysis.
- Public domain and landscape plan.
- Heritage impact assessment.
- Traffic and parking impact assessment.
- Solar access analysis.
- Wind assessment.
- View analysis.
- Social impact assessment.
- Economic impact assessment.
- Draft site specific DCP amendment.
- VPA offer.
- Site survey plan.

A formal pre-lodgement Planning Proposal that includes the main documents listed above is encouraged to be submitted prior to the lodgement of a Planning Proposal. A pre-lodgement meeting request form is available on Council's website at <https://www.georgesriver.nsw.gov.au/Development/Planning-Controls/Planning-Proposals>.



Should you require any further information, please contact Ms Catherine McMahon, Council's Manager Strategic Planning on 9330 6260.

Yours faithfully



Catherine McMahon
Manager Strategic Planning



06 November 2023

Matthew Di Maggio
Ethos Urban
Principal Planner
mdimaggio@ethosurban.com

Dear Mr Di Maggio

Preliminary Planning Proposal – 4-16 Montgomery Street, Kogarah

Thank you for meeting with Council officers on 28 September 2023 to discuss your preliminary Planning Proposal for 4-16 Montgomery Street, Kogarah. As requested, please find initial comments from Council officers on the preliminary Planning Proposal to assist you prior to lodgement of a formal pre-Planning Proposal should you wish to proceed.

We understand the proposal seeks the following,

- Mixed use development;
- Heights of 3 storeys to 32 storeys; and
- FSR 7.11:1.

The following is a summary of the comments raised by Council's Strategic Planners and Urban Designers with respect to the preliminary Planning Proposal and its concept scheme:

General

- An assessment of the Planning Proposal's strategic and site specific merit (as per the Department of Planning and Environment's (DPE's) LEP Making Guideline) is required when formal lodgement of the Planning Proposal is made.
- Consideration of the desired future character of the streets surrounding the development (Montgomery Street and Moorefield Lane) as outlined in the Kogarah Place Strategy <https://www.georgesriver.nsw.gov.au/Council/About-Your-Council/Regional-Projects/Future-Cities/Kogarah-Collaboration-Area>

This includes:

- Montgomery Street - Montgomery Street will be the flagship street for the area and will be a major mixed use and active street, with retail,

commercial and medical/civic uses with active frontages along its length. The street will have pedestrian priority and will change in character and design to accommodate the emergency access needs of the Hospital.

- Moorefield Lane - Post Office, Wicks, O’Keefe’s and Moorefield Lanes will provide a finer grain pedestrian network for the Kogarah Town Centre and will facilitate activation, street art and night time activity.

Heritage

- The subject site is surrounded by the following local heritage items under the *Georges River Local Environmental Plan 2021*:
 - 7-13 Regent Street (Shops)
 - 22-28 Montgomery Street (Terraces "Leah Buildings")
 - 1A Kensington Street (Former Sixth Church of Christ Scientist – Grace Chinese Church)
 - 2-8 Premier Street (Terraces)
 - 10 Premier Street (House and garden, "Stanmer")
 - 12-18 Premier Street (Terraces, "Burn Brae")
- The site is framed by multiple items of local heritage significance (as identified above). The heritage items are of various architectural styles, scale and form, yet are typically single or double storey in height, representing the low-scale of the traditional built form character of Kogarah.
- Any Planning Proposal must consider the significance of the heritage items and ensure they are afforded an appropriate and sympathetic backdrop and setting. It is important that the heritage items are not treated as isolated sites and must be meaningfully acknowledged in any redevelopment of the precinct, having an appropriate transition in height, scale and form so that the heritage items remain anchored in the streetscape and are not dwarfed or dominated by any substantial increase in the built forms of the subject site.
- The proposed introduction of setbacks and laneways through the site aids in providing separation between built forms and is a positive element of the preliminary Planning Proposal. However, careful consideration must be given to the verticality of any future built forms that there are suitably scaled podium levels that relate to the proportions and scale of the heritage items.
- Similarly, from a pedestrian perspective in the streetscape, the built forms should incorporate design elements and features to break-up any elongated building planes, allowing for the continued traditional rhythms in the streetscape having the appearance of individual buildings relative to the scale of the various heritage items.



- It is recommended that any progression of the Planning Proposal is undertaken in consultation with a suitably qualified and experienced heritage consultant, having regard to the identified significance of the identified heritage items within the vicinity of the site.
- The heritage consultant should provide further advice to guide suitable massing envelopes, ensuring appropriate setbacks and design principles are incorporated to guide future development of the site.

Height of Buildings

- Strategic justification needs to be provided for the floor space ratio (FSR) and heights proposed in the Planning Proposal, particularly in the absence of a Council endorsed strategic study or Master Plan.
- A survey plan is required to be submitted to determine heights for the site in relation to the airport height limits. It is recommended that you consult with the relevant airport authorities with respect to the proposed heights.
- Further consideration is required to the height transitions in relation to the surrounding context, including the heritage items and Moorefield Lane.
- Building heights should be distributed to define the street edge at the pedestrian scale and provide legibility and orientation at the local centre. The mix and range of buildings should create a visually interesting skyline with slender forms, achieved through small floor plates that respond to solar access and wind mitigation.
- When designing higher scaled buildings adjacent to lower scaled buildings, especially the low scaled heritage items, a progressive transition is to be provided, possibly by adopting a 45-degree angular plane measured from relevant property boundaries. Taller heights would be located in the centre of the site and shorter buildings to the north west and south east of the site, incorporating appropriate building separation and podium heights.

Podium Heights

- Podium tower topology for the Kogarah Town Centre is encouraged. The podium is recommended to be a maximum of:
 - 4 storey street wall height/podium height along Montgomery Street; and
 - 2 storey street wall height/podium height along Moorefield Lane with setbacks, particularly to the heritage items.



- Upper storeys/tower elements are to be adequately setback (minimum 6m) from the edge of the podium.

Tower Floorplates and Configurations

- Concerns that the proposed configuration and density of buildings will cause overshadowing internally of the proposed buildings and open space, adversely impacting amenity and compliance with the ADG.
- Preference for scattered slim towers with smaller floorplates (around 750m² floor plate excluding balconies) throughout the site, but coordinated with other towers to create visual interest, maximise access to sunlight and skyviews and minimise the impact of shadows and the wind tunnel effect above the podium and the pedestrian environment.
- A more realistic building configuration needs to be proposed that is compliant with the Apartment Design Guide (ADG), including compliance with:
 - Building separation (eg. the 11 storey building would need to be separated);
 - Solar access; and
 - Natural cross ventilation.

Open Space/Public Plaza

- There is a lack of open space in the Kogarah Town Centre and the provision of open space should be a priority for the Centre.
- The proposed development should provide more open space given the size of the site and significant uplift proposed.
- Concerns that the configuration and density of buildings proposed will cause overshadowing internally of the proposed open space, adversely impacting the amenity.
- Concerns the tall buildings and large floorplates surrounding all four sides of the proposed internal open space will create a sense of enclosure and a claustrophobic feeling within the space.
- The amenity and quality of the proposed open space needs to be improved by considering:
 - Deep soil open space to allow the provision of tree canopies (it is likely that given the location of proposed open space that no deep soil will be provided with the provision of basement parking);
 - Greater solar access; and



- The inclusion of a variety of elements encouraging inclusive use for all ages.
- A publicly accessible green open space area in the centre of the site should be considered to increase permeability, building separation and open space. A preferred location could be north east of the heritage item at 22-28 Montgomery Street combined with a pedestrian link.

Permeability

- Greater permeability through the site and to surrounding sites (including Kogarah Station, St George TAFE and St George Hospital) needs to be provided as the proposed >100m continuous podium along the laneway and Premier Street is a barrier to pedestrian circulation and lack of building separation is proposed.
- More permeable areas are required throughout the site, including open to sky through site links, especially between Montgomery Street and Premier Street. A potential location could be north east of the heritage site at 22-28 Montgomery Street.

Active Street Frontage

- Vehicle driveways and service entries/exits should be consolidated, and active street frontages should be encouraged.
- With consideration to Council's *Commercial Centres Strategy Part 1*, sufficient non-residential floor space should be provided on the ground floor and be active.
- Substantial articulation on the building façade as well as massing composition that will provide depth to the façade is required (not just a change of materials).

Impacts and demands on local infrastructure – Voluntary Planning Agreement

- The proposal will result in a significant increase in the number of residents and workers on the site. This will generate direct impacts and demand on local infrastructure and community facilities, including road and traffic facilities, transport facilities, open space and recreational facilities, public domain and community facilities.



- Council's *Local Infrastructure Contributions Plan 2021 (Section 7.11 and Section 7.12)* did not anticipate this proposal at the time the Plan was prepared. Therefore, the community facilities and services included in the Plan would not adequately address the demands and impacts of the new population.
- The provision of a Voluntary Planning Agreement (VPA) in conjunction with the Planning Proposal is considered an essential mechanism to assist in the delivery of infrastructure and facilities required to support the increase in population.
- Council's *Policy on Planning Agreements 2016* provides Council's policy and process relating to VPAs. It should be noted that this Policy is currently being reviewed by Council with a draft Policy to be presented to Council in the near future. The DPE's *Practice Note on Planning Agreements* also sets out the key principles for VPAs.
- To identify the public benefits required to support the proposal, Council will review the studies supporting the Planning Proposal as well as Council's and State agency strategies and studies.
- We encourage you to commence discussions on the infrastructure requirements and potential public benefits with Council's Manager of Strategic Planning and Executive Strategic Planner upfront as part of the Planning Proposal process.
- Some of the public benefits that may be required to support the new population include:
 - a. **Monetary contribution** - towards the provision and upgrade of infrastructure and community facilities.
 - b. **Road network upgrades and traffic management facilities** – some of these works may be required as part of the development of the site and would be conditioned on any future Development Consent or some works may be included in a VPA.
 - c. **New and upgrade of local parks and green space** – this may include the creation of new green open space as well as the embellishment of existing open space, parks and sporting facilities. Local parks in close proximity to the site include Hogben Park (Georges River LGA), Fry's Reserve, Tom Hanratty Reserve, Taylor Street Playground and Scarborough / Bicentennial Park (Bayside LGA). Embellishments may include upgrades to play equipment, fitness equipment, landscaping, rainwater harvesting for landscape irrigation, and dog off leash areas.



The ‘*Collaboration Area - Kogarah Place Strategy*’ states Kogarah Town Centre has a deficiency of existing open space, lack of access and poor quality of some open space and limited urban tree canopy. Key actions include creating new open space and connections.

The *LSPS 2040* flags the challenge of providing additional open space in the vicinity of Kogarah. A significant portion of the high density residential developments within the Kogarah Town Centre do not have access to a park within 200m, thereby unable to meet the benchmark set out by the *South District Plan*. To address this a key action is: “*When increasing residential density through rezoning, innovative solutions will be required for public open space to be provided in accordance with the South District Plan’s standard*”.

Council’s *Open Space, Recreation and Community Facilities Strategy 2019-2036* also identifies the need to create a green network in and around the Kogarah Town Centre and a need for a range of spaces in which people living alone can connect with one another and foster inclusion.

- d. **Active transport links** – improving and creating walking and cycling links, including the upgrade of pathways, pedestrian refuges or crossings, bike lanes, speed patches, line marking and signalised intersection along key roads/travel paths. Active transport link initiatives may include:
- connection along the Muddy Creek Canal,
 - improve strategic walking and cycling connections with Hurstville and Hogben Park,
 - improve laneways in the Kogarah Town Centre for walking and cycling,
 - additional cycle parking (racks and bike sheds) at Kogarah Train Station,
 - real time information displays at key bus stops in Kogarah,
 - create a green network in the Kogarah Town Centre to encourage active travel and increase amenity for residents, workers and visitors (improve the tree canopy, develop green walls and planting along footpaths) and green links with Fry’s Reserve, Tom Hanratty Reserve and Scarborough/Bicentennial Park in Bayside LGA,
 - improve signage to parks, and
 - an active transport study to determine the required improvements to active transport methods, including dedicated bike lane and footpath upgrades along Railway Parade from the proposed development to Hogben Park.
- e. **Creation of public access easements** – to enable pedestrian access and connectivity through the site and plaza areas which are an integral part of the overall design of a site.

- f. **Community and library facilities** – the proposal will result in the loss of the St George Bank Auditorium space that is used by the public and local schools for performances, theatres and conferences. The demand for community and library facilities will need to be considered.

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Should you require any further information, please contact Ms Catherine McMahon, Council's Manager Strategic Planning on 9330 6260.

Yours faithfully



Meryl Bishop
Director Environment and Planning

