

29 August 2019

Moosa Taouk
Capital Hill Group Pty Ltd
By email

Attention: Moosa Taouk

**Re: Planning proposal for 193-201 Rocky Point Road, 66-68 Ramsgate Road and 2-6 Targo Road, Ramsgate
Independent Urban Design Review**

Architecture
Urban Design
Planning
Interior Architecture

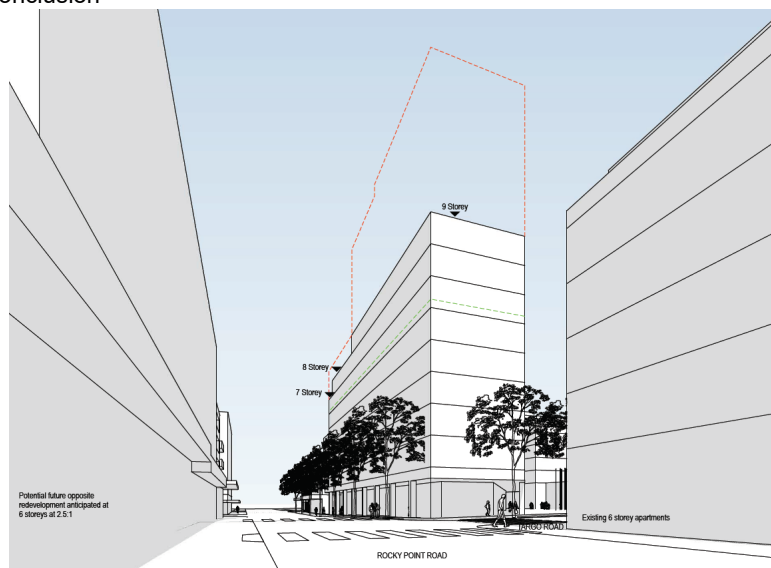
Dear Mousa,

This letter provides Architectus' independent urban design review against the current Planning Proposal for 193-201 Rocky Point Road, 66-68 Ramsgate Road and 2-6 Targo Road, Ramsgate.

Architectus has a history with the development of the site as Michael Harrison, Director at Architectus has reviewed and provided urban design principles for an earlier scheme in 2016.

A Planning Proposal package was lodged to Council in January 2018 including letter of support from Architectus. In response to this, Council has provided a letter to the applicant (3 May 2019) including a 'preliminary review' of the Planning Proposal by Elton Consulting recommending the application be withdrawn. In response to this the proposal has been modified and reduced in height, from a maximum 13 to 10 storeys. This letter provides an urban design review of the current proposal referencing the key points raised in the Elton Consulting preliminary review. It is structured as follows:

- The proposal
- Background
- Strategic appropriateness and building heights
- Amenity impacts
- Conclusion



View comparing the current proposal (white), previous proposal (red dash), LEP-complaint envelope (green dash) from the location where the tallest proposed element will be most prominent. This prominence has been substantially reduced through the recent redesign.

Source: Turner Architects

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Ray Brown
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The proposal

The proposal is for a site of 7,116 sqm. The design includes:

- A new Village Square,
- Pedestrianised laneway,
- Ground level retail and commercial,
- Basement level supermarket,
- Mix of building heights of mainly 6-8 storeys and up to 13 storeys for residential apartments above ground level shops,
- Child care centre and,
- Three (3) levels of basement parking.

The current planning proposal is seeking to amend Kogarah LEP 2012 for the site as follows:

- Amend Land Zoning Map so entire site is zoned B2 Local Centre.
- Amend Floor Space Ratio Map to increase FSR from 1.5:1 and 2.5:1 to 3.2:1.
- Amend Height of Buildings Map to increase maximum building heights from 15m and 21m to a range of 16m up to 35m.

Brief background of the Planning Proposal

Below is a brief outline of the development of the proposal. It includes but is not limited to:

- 16 February 2016 – Presentation to Georges River Design Review Panel.
- 29 April 2016 – *In response to Council's request Michael Harrison reviewed the scheme and advised on a set of guiding design principles to guide future development. This letter of advice was accompanied by concept sketches showing a street edge development with a maximum height of 6 storeys plus some additional height to the north-east corner of the site. It included a preferred location for an on-grade supermarket and a 6m wide rear lane linking Targo Road to Ramsgate Road.*
- 21 March 2018 – Revised proposal based on a larger site and taller buildings presented to Council.
- 9 May 2018 - *Council rejects the scheme of up to 19 storeys as being too high and too dense. Council recommended:*
 - *Acquisition of 203-209 Rocky Point Road for better planning outcome for whole block and adjacent heritage items,*
 - *Provision of laneway (Part E3 Ramsgate Centre KDCP 2013),*
 - *A detailed traffic study and traffic management plan be undertaken,*
 - *Plans to be put on hold till Council completes its Local and Strategic Centres Study so redevelopment of the site is consistent with the principles set out in the study for the Ramsgate Local Centre.*
- July 2018 – Revised scheme submitted to Council with reduced heights (15 storeys), basement supermarket, village square, rear lane/pedestrian link.
- 2 August 2018 - Revised scheme presented to the GRC Design Review Panel.
Georges River Council Design Review Panels response:
 - *Development of up to 15 storeys is too high and site coverage too dense,*
 - *They questioned the original reference of the proposed train line shown in the 'Town Centre Focus Plan' and the density required to support the unidentified transport imperative.*
 - *Village Square (public square) does not integrate with Rocky Point Road and existing residential.*
 - *15 storey tower overwhelms the square, dimensions of the proposed square would create poor amenity to residents (wind, noise, privacy), the square reads as an entry to supermarket and retail instead of public space.*

- *Issues with the transition of proposed heights with existing adjacent 1-2 storey buildings.*
- 18 January 2019 – Revised Planning Proposal submitted to Council (13 storeys)
- May 2019 – Letter from Council including attached Preliminary Assessment of Planning Proposal (Elton Consulting)
 - *Development of up to 13 storeys would be out of context with the current or future vision of the site*

Strategic appropriateness of building heights

Within the 2019 Elton Consulting report for Council, building height is noted as ‘the most contentious issue’.

Architectus has supported the proposal in its previous form and continues to consider the heights as strategically appropriate. Key reasoning for this support can be summarised as follows:

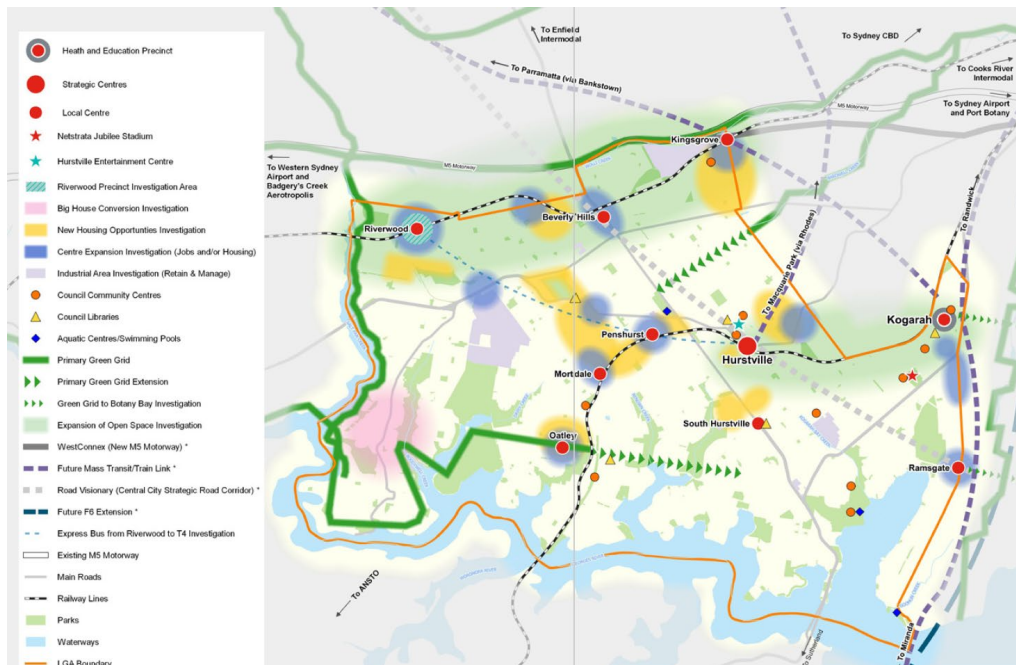
- The proposal provides a unique opportunity to Ramsgate through delivery of a new public open space that is protected for pedestrians from the difficult street environment of Rocky Point Road. This will be transformational for the centre and will improve the quality of Ramsgate. This has been acknowledged by Council including in a letter to the applicant (9 May 2018) stating *‘the subject site has the potential to play a role for the local area and there is an opportunity to provide a focal point for the neighbourhood with more local housing and access to goods and services’*
- Due to the large amalgamation required for this proposal and its transformational nature, it has not been considered by existing planning controls or current strategic planning processes; and a planning proposal is appropriate in delivering this.
- Ramsgate is defined as a local centre in both the Metropolitan Strategy and as part of the draft Georges River Local Strategic Planning Statement where it is noted for ‘centre expansion investigation (jobs and/or housing)’
- There is strong precedent in the vicinity for greater heights and density, in particular:
 - The former Darrel Lea site on Rocky Point Road, which is a large site that is not in a defined centre which has been zoned for a broad area tall building heights (33m as zoned and 42m as approved under Clause 4.3A of the RLEP 2011) and has been delivered in buildings of up to 13 storeys, with several reaching 12 storeys.
 - The next larger centre in the hierarchy locally is Kogarah which includes a broad area zoned for 39m building heights and FSRs of 4.5:1.

Against these the proposed increase in building heights from to a maximum 10 storeys / 35m for one smaller building form (with the top storey set back from the street frontage to not be visible in local views) appears to be entirely contextually appropriate.

In consideration of this, Architectus’ view is that the previous proposal of a taller 13 storeys is appropriate and would note concern regarding the centres hierarchy that the out-of-centre Darrell Lea site has been considered appropriate for taller development than this proposal which is within a defined local centre.

- A 9-10 storey building also allows for a suitable visual marker for Ramsgate centre on this site that will become a focal point of the centre, where much of the centre is planned for 6 storey heights. Architectus recommends that the height could extend above this height if an architectural design competition is

undertaken for the tall building component - consistent with the Government Architects design competition policy.



Ramsgate in the LSPS is noted as a local centre and for 'centre expansion investigation (jobs and/or housing)'

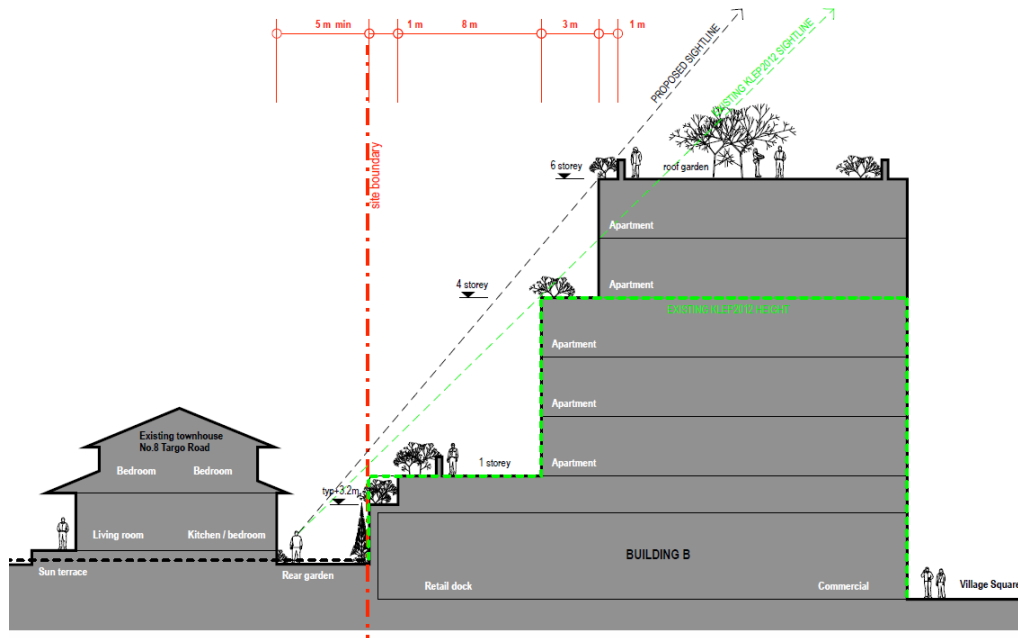
Amenity impacts

Whilst Elton's review notes building heights as the primary concern, it also notes that "the sheer size and scale of the proposed development would result in significant adverse impacts in terms of amenity of surrounding residents, impacts to adjacent heritage items, substantially increased pressure on the local road network and transport services, in an area which, at present, does not require the level of uplift proposed".

This report covers urban design issues and not heritage or transport where separate advice has been provided to support the current proposal.

The comments on amenity are described in Elton's as "There are a number of 2 storey residential developments at the rear of the site, all of which would experience significant adverse impacts in terms of amenity (visual and acoustic privacy, solar access) as a result of the proposed scheme". In considering this, reference should be made to relevant standards. In Architectus' view the current proposal provides an appropriate response to these as:

- SEPP65 compliant solar access is retained to surrounding residential uses within the current proposal, with the townhouses receiving 3 hours of winter sun from the west.
- The proposal provides beyond the minimum SEPP65 building separation requirements to surrounding residential uses. This is described in the section below. Elton's review appears to agree with this in a separate section where it states that "Separation distances are in accordance with the ADG and it is considered that internal residential amenity would be able to be achieved".



Section through Dock and existing houses showing how the proposal has been set back beyond the requirements of SEPP65 and the Apartment Design Guide (6m for up to 4 storeys and 9m for up to 8 storeys)

Conclusion

The Planning Proposal design concept has been revised in response to Council's review and the initial assessment provided by Elton Consulting. Architectus supports the PP and accompanying design concept as a worthy addition to the Rocky Point Rd Centre and the significant benefits it offers in the form of a village square, full service supermarket (in a basement), active uses and shops fronting the Village Square with a child care centre above and through laneway that can be a shared pedestrian/vehicle place in part. The interface with neighbours is carefully considered regarding amenity, solar access and privacy – and the relationship with the adjacent heritage building on Ramsgate Rd is well considered from an urban design perspective.

The pedestrian laneway to be shown as a clear and legible link to the Village Square. The location of the shopper pedestrian entry to the basement supermarket at the junction of the square and laneway is logical and easy for people to navigate through the square and along the laneway, activating these pedestrian spaces. The Village Square and laneway are capable of being delivered as high-quality spaces and provide an opportunity to generate further development for the adjacent properties and maintaining the amenity of the adjacent heritage building.

The additional height on the corner of Rocky Point Road and Targo Road is justified as a trade-off for the Village Square, laneway/pedestrian link and basement supermarket. The tower will be prominent in the skyline and so must be designed to a very high architectural standard.

Architectus is happy to meet with you to discuss the proposed recommendations, moving forward and the potential for a design competition for the site.

Regards,

A handwritten signature in black ink, appearing to read 'M. Harrison'.

Michael Harrison, Strategic Advisor, Urban Design and Planning

A handwritten signature in black ink, appearing to read 'G. Burgon'.

Greg Burgon, Principal, Urban Design and Planning