

Our ref: PS127427

8 August 2022

Harkirat Singh
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Dear Harkirat

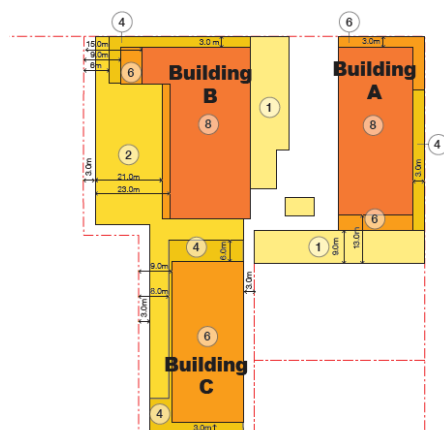
Rezoning Review Assessment – 193-199 Rocky Point Road, 66-68 Ramsgate Road and 2-6 Targo Road Ramsgate

WSP has been engaged by Georges River Council (Council) to undertake an independent assessment of a Rezoning Review for the site located at 193-199 Rocky Point Road, 66-68 Ramsgate Road and 2-6 Targo Road, Ramsgate, referred to as Ramsgate Village (the site).

An assessment of the Rezoning Review has been undertaken against the relevant strategic planning framework and site specific context to determine the merit of the Planning Proposal. A summary of the assessment is provided in this letter. The Planning Proposal is considered to provide strategic merit in that it will provide for mixed use development including additional housing and commercial floor space provision, in a local centre. However, it is considered that further refinement is required to deliver a place-based outcome that can be supported, particularly in relation to height and scale, landscaping, public domain, access and amenity. Included in this letter are a number of recommendations to resolve the issues outlined.

Note: For the purpose of this letter, the proposed buildings are identified as Buildings A, B and C in accordance with the Figure 1 below for ease of identification.

Figure.1 Subject Site



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WSP acknowledges that every project we work on takes place on First Peoples lands. We recognise Aboriginal and Torres Strait Islander Peoples as the first scientists and engineers and pay our respects to Elders past and present.

Background

On 15 October 2021 a Planning Proposal was lodged with Council for the subject site. WSP undertook a preliminary assessment of this Proposal. In November 2021 a request for additional information and amendments were issued to the Proponent to address matters relating to site specific merit including height, public square design, solar access, deep soil landscaping, traffic impacts and affordable housing.

In March 2022 the proponent submitted an amended concept to address the abovementioned concerns. However, a number of matters remained outstanding. Council issued a second RFI to the applicant advising that while some of the concerns previously were addressed most of the matters outlined had not been addressed and there was so no substantive change to the overall planning proposal as a result of the RFI that was issued. These matters included:

- Height
- Transition in height to heritage item
- Plaza/Through site links
- Deep soil landscaping
- Traffic; and
- Access to neighbouring site.

This Rezoning Review was lodged in June 2022. The Rezoning Review has included the following amendments to the previous Proposal that was assessed by WSP:

- Reduction in above ground FSR of 0.08:1;
- Reduction by one storey of Building A fronting Rocky Point Road;
- Part reduction in street wall height of Building A fronting Rocky Point Road and Building B fronting Targo Road by a couple of storeys;
- Width of plaza opening on Targo Road increased by 1.5 metres and on Ramsgate Road increased by 1.9 metres;
- Landscaped setback along western boundary increased to 3 metres to provide deep soil landscaping; and
- Banning right turn movements into Targo Road on weekday PM only and removal of parking on eastern side of Rocky Point Road and construction of a median in Ramsgate Road.

An assessment of the Rezoning Review is provided below. The Planning Proposal has been referred to the following internal Council officers, whose comments form part of this assessment:

- Urban Designer
- Heritage Officer
- Traffic Engineer

The proposal has also been provided to Transport for New South Wales (TfNSW). Their comments are included as an attachment to Council's response to the Rezoning Review.

Strategic Merit Assessment

The Planning Proposal generally provides strategic merit as summarised below:

- The Planning Proposal will revitalise the local centre in accordance with the planning priorities and objectives of the Greater Sydney Region Plan and the South District Plan, specifically:
 - It will support the delivery of a mixed-use development which will enable people to live close to jobs and services.
 - It includes the provision of publicly accessible open space and high quality public domain to meet the needs of the community and future residents.
 - It would increase streetscape activation and social interaction through the provision of a new town square and public open space.
- The Planning Proposal is aligned with the Georges River Local Strategic Planning Statement, which identifies Ramsgate Local Centre as a centre to ‘explore Centre expansion for jobs and/or housing’.
- The Planning Proposal is generally consistent with Council’s Local Housing Strategy, where it provides for a range of housing options, in the form of 1, 2 and 3 bedroom apartments.
- The Planning Proposal will offer a range of material public benefits including publicly accessible open space, public domain improvements, and traffic improvements.
- While the site is not located close to major transport links, the Planning Proposal would increase the level of residential development within walking distance of centres with a supermarket, which is a desirable liveability outcome.
- The Planning Proposal provides a mixed use development with employment floor space which will activate Ramsgate. The Georges River Commercial Centres Strategy which was adopted in February 2020 identified that demand for employment floor space in the Ramsgate centre is expected to increase by 15% by 2036 from 12,592 sqm to 14,481sqm. Stage 1 of the Strategy recommended the following be undertaken to achieve the Strategy objectives:
 - Review the minimum non-residential FSR requirement in the centre with the aim of providing sufficient non-residential floor space to meet the 2036 demand;
 - Conduct place-based analysis to activate centre and ensure its ongoing viability – including investigating the existing height and FSR development standards, infrastructure provisions and public domain outcomes;
 - Conduct further investigation to determine the suitability of the possible promotion to “local centre” classification in the centres hierarchy; and
 - Introduce design excellence mechanisms to facilitate good design.

Stage 2 of the Strategy has not yet been finalised and as such a detailed assessment against the Strategy has not been undertaken.

Site Specific Assessment

Height and Setbacks

- The Georges River Development Control Plan (GRDCP) 2021 (Part 7 Business Precincts) requires increased side and rear setbacks to be provided for new development in the B2 Local Centre zone when it adjoins an existing development in a lower density area.

The proposal allows for a maximum height of 29 metres and the height limit to the west of the site is a maximum of 15 metres, which reflects lower scale residential development. The 29

metres and 8 storey height limit will result in a development that is close to double the height permitted on land to the west of the site. In addition, the proposal doesn't comply with the minimum 9 metre setback as required for habitable rooms above 4 storeys pursuant to Objective 3F-1 of the Apartment Design Guide (ADG).

Given the height and limited setbacks the proposal is not considered to provide an appropriate transition to the lower density development to the west of the site.

- The Proposal does not provide an appropriate street wall height to Rocky Point Road, Targo Road and Ramsgate Road due to the limited setback of the upper levels. The GRDCP locality statement for Ramsgate recommends a 4 storey street wall height to define the street line. The proposal includes a 4-6 storey wall height for Building A and Building B and a 4 storey street wall on Ramsgate Road for Building C which is above that envisaged by GRDCP. In addition, the storeys above the street wall height are setback 3 metres from the street wall. This limited setback means from the view of the pedestrian the building has a perceived street wall height of 8 storeys from Rocky Point Road and Targo Road and the lower levels do not read as a podium. The street wall height is not considered to be compatible with Ramsgate and surrounding development commensurate of a local centre and should be reduced to more closely meet the locality statement requirement of 4 storeys.
- This proposed height as well as the limited setbacks will result in adverse amenity impacts for the residential properties to the west in terms of overshadowing as well as visual bulk. The proposed local provision which would allow communal open space/lift overruns and services above the maximum permissible height will further exacerbate the overall bulk and scale impacts of the development.
- The proposal provides a poor interface with and transition between the building adjoining Ramsgate Road and the adjacent heritage 'Roma' apartments at 70 Ramsgate Road. With the proposed height of 6 storeys, this building is seen as a tower when juxtaposed to the 2 storey 'Roma' apartments. The proposed boundary setback of 3 metres does not offer sufficient separation from the existing heritage item nor does it comply with the minimum 9 metre setback as required for habitable rooms above 4 storeys by Objective 3F-1 of the ADG.
- Council's Heritage Officer raises concerns that the Heritage Impact Statement (HIS) considers the proposal will have an acceptable heritage impact. However, the HIS includes a building height diagram on page 26 that does not accord with that shown on page 7 of the draft DCP. The HIS version shows the inverted image of page 7 of the draft DCP. Consequently, it is unclear whether this was noted in the HIS, which opinions that the transition in scale between the proposed building envelope and the adjoining heritage item is acceptable.
- Council's Urban Designer has provided comment on the proposal relating to setbacks, height and visibility of the public plaza from the public domain which are generally consistent with the concerns raised above.
- Given the above concerns raised regarding height, setbacks, size of the public square and size of street openings, it is considered that the Planning Proposal may reflect an overdevelopment of the site, and the proposed density should not be permitted if the proposal cannot provide an appropriate public domain and built form outcome.

Public Square

- The Proposal includes provision of a public square however concerns are raised with the public domain interface due to limited visibility from the street. The width of the opening on Targo Road is approximately 16.8 metres and set between building A and B. Due to the position of this opening and the width proposed it does not read as highly visible from the public domain. Despite being a local road, Targo Road has limited traffic and therefore insufficient exposure to passing trades to warrant the general public being informed about the presence of the plaza.

Even though the entrance has been widened by 1.9m, sight lines to and from the plaza and Ramsgate Road remain extremely limited as visibility is only afforded to pedestrians when they are standing directly in front of the entrance. In addition, views to the plaza from Ramsgate Road are also extremely limited with the 45 metres long entry way having a width of approximately 3-4 metres. Given the limited width and views from the public plaza to this lane there is significant concern for the absence of public surveillance in this laneway.

- While the plaza would offer social benefit in the form of a gathering and social space for the surrounding community it does not lend itself to being used by the public due to its limited visibility. It is recommended that the through-site link be widened and re-positioned to enable direct sight lines to the public square and vice versa. The public square also needs to be increased in width to enable greater solar access and visibility to passing trades, especially along Rocky Point Road. Previous Planning Proposals submitted for the site illustrate a much more prominent public plaza.
- The proposal has included a letter from MEL consultants which states measures could be implemented to mitigate any wind impacts. However, no evidence or Wind Report has been submitted to demonstrate that the plaza will not be subjected to wind tunnel impacts. Therefore, it has not been demonstrated that the plaza will be usable for pedestrians and given the narrow design of the square it is considered that further evidence to demonstrate the wind impacts is required.

Vehicle Access and Traffic

Council's Traffic Engineer has reviewed the proposal and provided the below comments advising additional information is required to confirm that the Planning Proposal will not result in adverse impacts on the street network:

- No objections are raised with allowing right turn manoeuvres from Ramsgate Road into Targo Road with no right turn (NRT) restrictions during the afternoon peak subject to this being conducted as a trial on completion of the development to determine the effects it may have on residential streets.
- The significant increase in the number of residents and workers on the site as a result of the proposal will exacerbate traffic congestion in the area, especially with the no right turn (NRT) from Rocky Point Road to Targo Road in peak hours. Consequently, people will use the residential streets to access the proposed development and local streets like Hastings Road will cause traffic to build-up on Rocky Point Road and lead to further traffic congestion in the area.
- The proposed installation of traffic signals on Rocky Point Road at the intersection of Targo Road would result in removal of parking spaces from the eastern side of Rocky Point Road which are located in the Bayside Local Government Area. No correspondence from Bayside Council has been provided with this Planning Proposal confirming they raise no objections to this arrangement. As such, it has not been demonstrated that installation of traffic signals is acceptable. Furthermore, the north bound right turns into the driveway for the commercial property on the Bayside Council side will need to be removed to operate the signals. No correspondence from Bayside Council has been provided with this Planning Proposal confirming they raise no objections to this arrangement.
- Based on the applicant's Traffic Assessment, the Level of Service is currently F for east bound traffic on Ramsgate Road. Based on the assessment of forecasted traffic in 2032, modifications to the signalised intersection of Ramsgate Road/ Rocky Point Road will improve the LOS for east bound traffic along Ramsgate Road but will also reduce the LOS in all other directions. Without any upgrades in future, the increase in residential and retail uses in the proposed development will worsen the impacts.

- The Planning Proposal provides inadequate information to confirm that all access for residents and retail customers is to be provided through Targo Road only to prevent vehicles travelling through local streets south of Ramsgate Road and to allow for the right turn manoeuvres to be maintained from Dalkeith Street. Furthermore, no details have been submitted to demonstrate how vehicles conducting right turns from Ramsgate Road into Dalkeith Street will be prevented.
- The Planning Proposal includes a shared 6 metre wide opening from Ramsgate Road to provide access to 201-209 Rocky Point Road. An easement is proposed as part of the VPA for the pedestrian/vehicle shared way.

It is unclear from the documentation provided with the Planning Proposal whether the proposed access arrangement can suitably accommodate MRVs required for back of house functions or Council's garbage collection vehicles. Swept path analysis has not been provided to demonstrate that the proposed width of the shared way is wide enough to allow waste service vehicles to conduct their left turn manoeuvres from the kerb side lane only without the need to occupy multiple lanes. This is required to ensure garbage collection doesn't occur on Rocky Point Road resulting in traffic impacts and creating a highly undesirable pedestrian experience with garbage bins taking up the footpath and disrupting the active street frontage.

- It is to be noted that the cost of relocation of the pedestrian refuge west of the Promenade is to be borne by the developer.
- TfNSW have provided detailed comments on the proposal. TfNSW have raised a number of concerns and detailed that inadequate information has been provided with the Planning Proposal to demonstrate that the proposal will not result in adverse impacts on the surrounding road network. These comments are included as an attachment to the response to the Department of Planning and Environment (DPE).

Deep soil landscaping

- The proposal includes new tree planting however provides no deep soil landscaping across the site where the basement footprint has been maximised. The Apartment Design Guide (ADG) requires 7% of the site area to be provided as deep soil zones, with a minimum dimension of 6m for sites greater than 1,500sqm. The proposal includes a 3 metre setback from the western boundary with landscaping proposed in this setback. A 3 metre setback is not considered to be adequate to facilitate the growth of deep soil landscaping. A proposal with 0% deep soil zone will set a poor precedent for future developments across commercial centres in the LGA.
- While it is acknowledged that it is difficult to provide deep soil landscaping on sites that have basements in commercial centres, given the location with Ramsgate being a local centre and with lower density residential to the west it is considered deep soil landscaping is necessary to provide an appropriate transition and buffer between the site and the adjoining properties to minimise visual bulk and scale impacts.

Recommendations

The following amendments are recommended to be incorporated into any revised Planning Proposal to provide an appropriate outcome for the site and the surrounding area:

- a) An ADG compliant setback from Building B and Building C must be provided to the western boundary (9 metre setback up to 4 storeys and 12 metre setback above 4 storeys) to minimise impacts on the adjoining residential properties and provide an appropriate transition to the lower density residential development and ensure consistency with GRDCP.
- b) Reduce the street wall height to four storeys to more closely align with the locality statement requirements for Ramsgate provided within the GRDCP.

- c) A minimum setback of 5 metres from the street should be provided for all tower elements above podium level across all buildings to recess the dominating presence of the 8 storey tower form. The minimum setback also applies to balconies, terraces, and balustrades. It should be noted that the overall height of 8 storeys is considered acceptable subject to an increase in setbacks as detailed within this recommendation. However, given the concerns raised throughout this letter it is considered that the Proposal is an overdevelopment of the site if setbacks cannot be met.
- d) ADG-compliant setback distances from Building C to 70 Ramsgate Road must be provided to ensure minimal amenity impacts to the occupants of 'Roma' apartments (70 Ramsgate Road), and by extension, provide an appropriate interface to the heritage item. Alternatively, Building C should be reduced to a maximum of 4 storeys to provide an appropriate transition to the two storey heritage item.
- e) In accordance with the ADG, deep soil zones on sites with site area of greater than 1,500sqm must have a minimum dimension of 6m to be counted within the deep soil zone calculation. Accordingly, the deep soil zone/landscaped setback from the western boundary should be increased to 6 metres to allow for deep soil landscaping and an appropriate transition to the lower density residential development
- f) The opening on Targo Road should be widened in the direction of Rocky Point Road (i.e. reduce the footprint of Building A) to clearly identify the plaza as a public, activated and welcoming space.
- g) The laneway accessed from Ramsgate Road is required to be widened to a minimum width of 6m for the full length to increase opportunities for direct sight lines to and from the public square.
- h) A Wind Impact Assessment should be prepared to confirm the public plaza will not be subjected to adverse wind tunnel impacts.
- i) The HIS should be amended to consider any revisions to the Planning Proposal and to reflect the correct building height diagram.
- j) Council has no objections to allow right turn manoeuvres from Ramsgate Road into Targo Road with NRT restrictions during the afternoon peak. However, the NRT should be conducted as a trial on completion of the development to determine the effects it may have on residential streets. Confirmation is required from Bayside Council that they are satisfied with the removal of parking on the eastern side of Rocky Point Road prior to this option being considered acceptable.
- k) Confirmation is required that all access for residents and retail customers be provided through Targo Road only to prevent vehicles travelling through local streets south of Ramsgate Road. This will also allow for the right turn manoeuvres to be maintained from Dalkeith Street. The median island is recommended to be extended past the proposed property driveway to prevent vehicles conducting a right turn from Ramsgate Road.
- l) The comments provided by TfNSW are required to be addressed to ensure there will be no adverse impacts on the surrounding road network. The detailed recommendations provided by TfNSW are included as an attachment in the response to DPE.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Linda Rodriguez', with a long horizontal stroke extending to the right.

Linda Rodriguez
Planning & Approvals Team Lead - NSW Urban
and Strategic Planning