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Harkirat Singh
Senior Strategic Planner
Georges River Council
Email: hsingh@georgesriver.nsw.gov.au

Dear Harkirat

Preliminary Assessment Planning Proposal - 193-199 Rocky Point Road, 66-68 Ramsgate and 2-6 Targo Road Ramsgate

Elton Consulting, a WSP Company has been engaged by Georges River Council (Council) to undertake an independent assessment of a Planning Proposal 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).

A preliminary assessment has been undertaken against the relevant strategic planning framework and site-specific context, to determine the Planning Proposal's strategic and site-specific planning merit.

The revised Planning Proposal provides a reduced overall height, reduced street wall height, reconfigured public square, increased setbacks to heritage buildings and redistribution of bulk across the site. The Planning Proposal no longer incorporates the land and buildings at 201-205 Rocky Point Road to address previous concerns relating to heritage and site isolation. Vehicle access has also been re-modelled in line with discussions undertaken with Transport for NSW (TfNSW).

Although it is acknowledged that the revised concept has undergone some significant changes from the previous submission, the density proposed by this Planning Proposal remains similar to the previous PP which was refused by the South Sydney Planning Panel (SSPP). 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.

Strategic merit

The current Planning Proposal generally provides strategic merit as follows:

- 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 and Eastern City District Plan, specifically:
 - It will support the delivery of a mixed-use development which will enable people to live close to jobs and services.
 - The Proposal includes the provision of publicly accessible open space and high-quality public domain to meet the needs of the community and future residents.
 - The proposed development 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. There is no provision for affordable housing as part of the planning proposal. Affordable housing provisions should be included in any VPA for the site (monetary and/or works in kind).
- The Planning Proposal will offer a range of public benefits including a publicly accessible open space, public domain improvements, and traffic improvements.
- The Planning Proposal is supported by the Georges River Commercial Centres Strategy which identifies Ramsgate for opportunities to grow by more than 15% in commercial floor space to 2036. The Planning Proposal provides a mixed use development which will activate Ramsgate and allow it to transition into a local centre as envisaged.
- While the site is not located close to major transport links, the Proposal would increase the level of residential development within walking distance of centres with a supermarket, which is a desirable liveability outcome.

Notwithstanding the above, a preliminary assessment against the Draft Activating Our Centres Policy has been undertaken. The Proposal does not demonstrate consistency summarised as follows:

- The Proposal complies with the current non-residential floor space requirement for the site however does not comply with the 0.5:1 non-residential above ground floor space
- The maximum height is not considered to be compatible with Ramsgate and surrounding development that reflects a local centre and does not provide an appropriate transition to the residential zones to the west.
- Requires refinement to ensure it makes a positive contribution to the public domain.

Refer to the site-specific merit discussion below for detailed assessment in relation to height and public domain concerns.

Site specific merit

Height

- The Proposal does not provide an appropriate street wall height to Rocky Point Road where it maintains a 6 storey street wall height along the entire length of the frontage which provides a poor public domain outcome. The Georges River DCP locality statement for Ramsgate recommends a 4 storey street wall height to define the street line. The street wall height is not considered to be compatible with Ramsgate and surrounding development that reflects a local centre.
- The overall height remains out of context with the surrounding development on Rocky Point Road, which provides a maximum height of 6 storeys. Specifically, the 8 storey overall height and 6 storey street wall height of the proposed development adjoining the low density residential properties to the west (Building B) is likely to result in adverse amenity impacts, with particular concerns raised for solar access and bulk and scale and provides a poor transition to the lower scale developments. The proposed local provision which would allow communal open space/lift above the maximum permissible height will further exacerbate the overall bulk and scale of the development.
- The scale of the building fronting Rocky Point Road should be afforded greater modulation to provide a more harmonious transition in the scale to the adjoining heritage item. This is also necessary to ensure that the occupants of 'Roma' are still afforded a reasonable amount of solar amenity. The independent heritage referral recommends improvement to the building envelope fronting Rocky Point Road to introduce improve transitions in scale to reduce height away from heritage items.

Public Square

- The Proposal includes provision of a public square however concerns are raised with the public domain interface due to limited visibility from Rocky Point Road and minimal pedestrian connections from Ramsgate Road.
- Furthermore, the solar access to the public square is limited and likely to result in underutilisation of this space and will provide a poor public domain outcome.
- The through-site link is required to be widened and re-position to enable direct sight lines to the square and vice versa. The square also needs to be increased in width to enable greater solar access and visibility to passing trades, especially along Rocky Point Road. The independent massing plan prepared by Architectus for the previous Planning Proposal illustrates a much more prominent public plaza.

Vehicle Access

- The Planning Proposal does not adequately address the issue of vehicle access for the 201-209 Rocky Point Road. The previous Kogarah DCP 2013 included a control which required a 5m laneway to be provided at the rear for vehicle access. The Planning Proposal relies on the 3m building setback of the heritage item to function as the vehicle access for these sites.
- When these sites are redeveloped as a mixed use development, the existing easement cannot accommodate MRVs required for back of house functions or Council's garbage collection vehicles. It will force garbage collection to occur on Rocky Point Road whereby creating a highly undesirable pedestrian experience with garbage bins taking up the footpath and disrupting the active street frontage, as well as significant impacts to the traffic on Rocky Point Road.

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 to fill up the entire parcel boundary. 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. A proposal with 0% deep soil zone will set a poor precedent for future developments across commercial centres in the LGA.
- It is suggested that the basement footprint be reduced, and deep soil landscaping incorporated along the western boundary to meet this minimum requirement.
- Furthermore, the concept scheme should commit to alternative green infrastructure solutions including but not limited to green roofs and green walls that incorporate rainwater harvest and reuse systems.

Traffic

- The proposed development would result in increased pressure on existing road network and public transport (bus) services and infrastructure, due to the development of 185 new dwellings, resulting in a subsequent population increase.
- The Proposal details offers to enter into negotiations for VPA for traffic improvements, such as the creation of controlled intersections at the Ramsgate and Rocky Point Road intersections with Targo Road.
- TfNSW will need to confirm whether the upgrades that form part of VPA are considered adequate to mitigate any adverse traffic impacts from the Proposal. Given the revitalisation of the local centre it is considered that Proposal has strategic merit subject to TfNSW confirming all traffic measures are appropriate.

Affordable Housing

- The proposal seeks to provide circa 185 new dwellings however no provision has been made for affordable housing despite a demonstrated need in the LGA as evidenced by Council's Local Housing Strategy
- Accordingly, commensurate affordable housing provision (monetary and / or Works in Kind) should form part of any negotiations and letter of offer to ensure sufficient provision for affordable housing in the LGA