



Our ref: PS127427

18 March 2022

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Georges River Council  
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Dear Harkirat

**Response to Revised Planning Proposal – 193-199 Rocky Point Road, 66-68 Ramsgate Road 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 preliminary assessment identified a number of matters that would be required to be addressed as part of an amended proposal, summarised as follows (and appended):

- Street wall and overall height of proposal
- Transition to properties to the west
- Transition to heritage items
- Plaza/Through-site links
- Solar access
- Access to neighbouring site
- Deep soil landscaping
- Traffic
- Affordable housing

On the 29 November 2021 a letter was issued to Council identifying the above matters to be resolved prior to progressing assessment of the Planning Proposal.

On the 1 March 2022 the Proponent provided an amended concept in response to the preliminary assessment matters outlined above. The revised concept has undergone some positive changes from the

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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.

previous submission, however, there are a number of matters that require further consideration and significant design changes to warrant support.

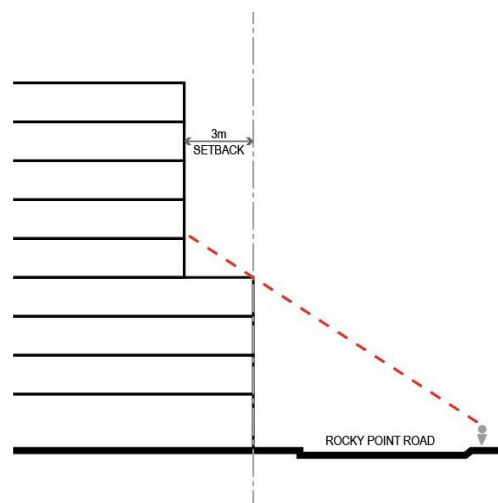
The below summarises our initial comments on the revised concept provided by the Proponent. It is to be noted that a full set of architectural plans illustrating the revised concept has not been provided therefore these comments will be further considered with any full set of plans provided.

## Height

- Stepping the proposed street wall of 6 storeys at the corner down to 4 storeys towards the centre of the site has partially resolved previous concerns raised relating to street wall heights. Notwithstanding, the overall bulk of the building has not been reduced as the proposal retains a 9 storey tower on Rocky Point Road and along Targo Road. A 3 metre setback is not sufficient for the tower form to be recessed from the perspective of a pedestrian on Rocky Point Road, as illustrated by **Figure 1** below. At the theoretical eye height of 1.8m, the entire bulk of the tower element will be visible from the public domain. The minor reduction in the height of the street wall alone is not considered to be an adequate response as the overall bulk and scale of the development has not been reduced. While it is acknowledged the street wall height has been reduced, the setbacks of the upper levels are not considered sufficient to ensure compatibility with the surrounds to reflect the local centre scale.

*Note: Any revised set of plans should include height in metres for the proposed scheme in addition to identifying the number of storeys.*

- The revised architectural plans should show the original street wall height proposed to illustrate the extent of reduction proposed.
- The revised concept does not include an elevation/building envelope diagram along Ramsgate Road and as such it is unclear if the height along this elevation has been altered as a result in changes to the street wall height on Rocky Point Road. Further consideration of the height along this elevation is required.



**Figure 1** Line of Sight Diagram

## Transition of height down to properties to the west

- The transition to the properties to the west from Building B has been partially resolved through the reduction from 6 storeys to 4 storeys and adoption of the stepping street wall approach down to 1.5 storeys at the western side boundary. However, the impact of this reduced building envelope on the

proposed density and FSR sought by the Planning Proposal is unknown and no elevation/building envelope diagrams of Ramsgate Road have been provided to determine the building envelope elsewhere on the site. Any proposed amendments must be supported by revised FSR calculations and will be considered in their entirety as part of an amended set of plans.

- The 1.5 metre setback from the western boundary adjoining the car park entrance is considered inadequate and does not ensure an appropriate transition to lower density properties to the west. The Georges River Development Control Plan 2021 (GRDCP 2021) requires the provision of a 5 metre setback to buffer adjoining lower density residential development and the proposal does not provide this. Furthermore, the 1.5 metre setback is not of an adequate size to promote deep soil landscaping to screen this elevation as well as contribute to other environmental benefits, such as infiltration of stormwater and reduction of urban heat island effect.
- In addition to the above, Part 7 of GRDCP 2021 also includes objectives and controls to ensure an appropriate transition between business zones and adjoining residential zones. Specifically, the controls in Part 7.1.4 relevant to the development are reproduced below:

### ***3. Interface between Business Zones and adjoining land uses***

#### ***Controls***

*5. Side and rear boundary setbacks adjacent to a lower density residential zone or heritage item/conservation area for the purposes of visual separation, privacy and transition: a. Minimum setback of 9m from the boundary between ground level and up to four storeys. b. Upper-level setbacks are 12m above four storeys. Note: Private open space and balconies must comply with Part 4E of the NSW State Government's Apartment Design Guide.*

The Proposal is not considered to be consistent with the abovementioned controls where it does not provide an appropriate transition to the residential properties to the west due to the minimal setbacks proposed. Therefore, the Proposal will require substantial amendments to provide increased setbacks from the western boundary and ensure an appropriate transition in height to the lower scale residential development to the west.

### **Transition in height down to heritage item**

- For the reasons discussed above regarding the overall scale of the development when perceived from Rocky Point Road, the existing issue caused by the scale of the building fronting Rocky Point Road in relation to the heritage item at 211-219 Rocky Point Road remains unresolved. A significant reduction in the height of the tower element is required to ensure an appropriate transition to the nearby heritage items and to provide a scale of development that is compatible with Ramsgate.

### **Plaza/Through-site links**

- The plaza has been increased in size and its visibility from and presentation to Targo Road has been improved. However, previous concerns regarding the limited visibility from Rocky Point Road remain unaddressed. Reconfiguration of the building footprints is required to ensure the plaza's visual prominence to foot traffic and passing trades.
- Consideration must also be given to the impact of wind tunnelling on the site. As such, a wind impact assessment should be undertaken to demonstrate that the walkways, width of plaza will not result in adverse wind impacts and ensure a usable and inviting public plaza.
- Consideration must also be given to pedestrian amenity and is to be addressed through the provision of continuous awnings for weather protection (Control 5 in 7.1.2.1 - Streetscape of GRDCP 2021). Awnings must be provided continuously and are to be of the same height and

design along the shop frontages to provide weather protection for pedestrians (Control 1 of 7.1.3.3 – Awnings of GRDCP 2021).

### **Deep soil landscaping**

- In accordance with the Apartment Design Guide, deep soil zones on sites with a site area greater than 1,500sqm must have a minimum dimension of 6m to be counted within the deep soil zone calculation. The objective of providing deep soil zones is to allow for the growth of healthy trees and to promote management of water and air quality. In instances where a site is unable to provide the required deep soil zones (at least 7% of site area), then alternatives may be considered subject to the objective of the ADG being satisfied. The location of the site at the periphery of the business zone presents the opportunity for deep soil to be provided at the western side boundary, albeit it is acknowledged that it may not be possible for the site to provide 7% of its site area as deep soil zones in light of the proposed retail uses.
- Notwithstanding the above, the complete absence of deep soil landscaping within the concept scheme remains unaddressed and does not result in a positive design outcome for the public domain or surrounding residential properties.
- GRDCP 2021 provides objectives and controls to ensure basements within mixed use developments and residential flat buildings are designed to allow for adequate deep soil landscaping. These objectives and controls have been reproduced below.

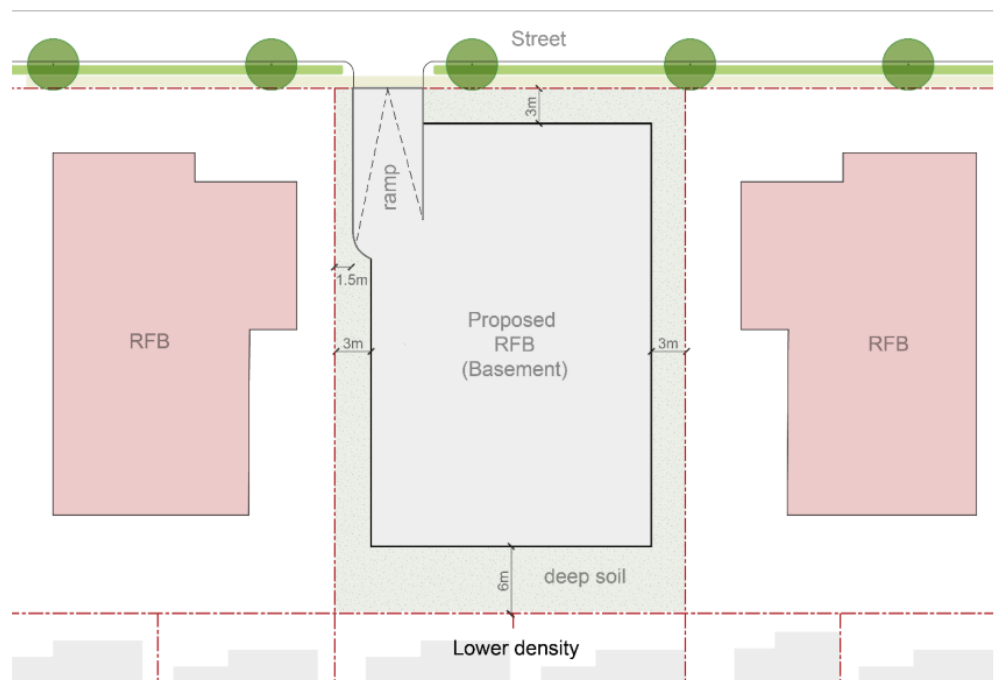
#### **6.3.4 Basement Setbacks**

##### **Objectives**

- (b) Provide opportunities for deep soil landscaping and new tree planting.*
- (c) Accommodate opportunities for on-site infiltration of stormwater.*
- (d) Accommodate landscaping that will contribute to the tree canopy of Georges River and provide shade and screening for residential development and reinforce a landscaped street character.*
- (e) Provide capacity to protect existing trees on site and provide capacity for new tree planting.*

##### **Controls**

- 1. Basements are to be set back a minimum of 3m from the site boundaries*
- 2. The basement setback areas are to be deep soil areas as defined in the Apartment Design Guide.*
- 3. Driveways and driveway crossings are to be located a minimum of 1.5m from a side boundary.*
- 4. Where a development site shares a boundary with a lower density zone (i.e., R2 or R3 zones), the minimum setback of the basement is to be 6m from the boundary with the lower density zone (refer to Figure 6 below).*
- 5. The 6m basement setback at a zone boundary is to be planted to provide a vegetated landscape buffer between the development and adjoining lower density development. Planting is to include trees that achieve a minimum mature height of 6.0m. Under canopy planting is to include lower scale planting that provides a visual buffer between developments and creates the desired landscape buffer.*



**Figure 6:** Application of the setbacks required for basements - with lower density interface

- Given the above, the Proposal is to be reconsidered and amended to provide a greater extent of deep soil landscaping. A reduction in the basement in accordance with the setbacks outlined above will be required to ensure deep soil landscaping can be provided on site.
- The use of planting on structures will only be considered as an alternative to deep soil landscaping if these areas are minimum 6 metres in dimension (i.e. at least 6 x 6 metres) in accordance with the ADG requirement to provide a conducive environment for the growth of mature canopy trees. Planting on structures with extensive soil depths of at least 1-1.5 metres are only acceptable when they are provided in conjunction with genuine deep soil zones on the western boundary.

## Traffic

### Banning of Right turn from Rocky Point Road

- Council acknowledges TfNSW's first preference to ban right-turn movement for southbound traffic on Rocky Point Road into Targo Road and Ramsgate Road 24/7 or banning right-turn movement in the afternoon peak only as a second preference. However, Council requires further traffic analysis and traffic counts to be conducted along Hastings Road, Burgess Street and Targo Road to confirm the impact this will have on local roads. To assist with comparing current data to pre-covid data, Council has existing counts conducted in 2019 on Burgess Street. See the Burgess St spreadsheet attached to the email.

### Ramsgate Road vehicle access

- Prevent RT movement for residential access from Ramsgate Road:

In regard to residential access from Ramsgate Road (westbound vehicles), Council prefers the construction of a median island (back-to-back kerb – approx. 500mm wide) to be built along Ramsgate Road from the junction of Ramsgate/Rocky Point Road to the intersection of Dalkeith Street/ Ramsgate Road with proposed left in left out traffic manoeuvres from Dalkeith Street. This will prevent illegal right-turn manoeuvres on Ramsgate Road for residential access. This may require Council's Local Traffic Committee approval.

However, consultation is to be undertaken with the businesses on the southern side of Ramsgate Road regarding permitting only left in left out of the carpark. This matter is to be discussed further following consultation with businesses.

- Potential vehicle detours

Regarding residential access and commercial access for all westbound movement along Ramsgate Road and possible south bound movement from Rocky Point Road, further traffic analysis and traffic counts are to be conducted along Torwood Street, The Promenade, Lloyd Street and Dalkeith Street.

Further concerns are raised over the existing intersection of The Promenade/ Torwood Street for potential residential detour in the future. i.e., RT movement from Torwood Street into The Promenade. Further analysis needs to be conducted to determine the impact of increased vehicle movement at this intersection and if potential changes to the intersection design are required.

#### Ramsgate Rd/Targo Rd access out of The Promenade

- Council supports the modifications to the intersection of The Promenade/ Targo Rd/ Ramsgate Rd into a signalised intersection to allow all movements out of The Promenade and Targo Road with NRT restrictions from Ramsgate Road into Targo Road.

#### Impact of sight lines at existing pedestrian refuge

- However, further analysis needs to be undertaken regarding the implications on the sight lines for pedestrians at the existing refuge island on Ramsgate Road (approximately 130m away), west of The Promenade; should there be an installation of traffic signals. There could be concerns for pedestrians with misjudging the speed of vehicles while crossing the road with the signals being only 130m away. Options to move the refuge further west on Ramsgate Road should be explored.

#### Relocation of westbound bus stops

- Council has no concerns with the proposed relocation of the bus stop on the northern side of Ramsgate Road as the existing area is signposted 'No Stopping' subject to approval from TfNSW and bus services. The applicant will need to bear the cost of relocating the bus stop and signage, and ensure that it is built to standards; including DDA obligations.

### **Access to neighbouring site**

- The concern regarding vehicle access for the future development at 201-209 Rocky Point Road has been partially addressed by widening the opening on Ramsgate Road to allow for a pedestrian/vehicle shared way for future waste vehicle movements in the future. However, the Planning Proposal continues to rely on the existing 3m wide building setback on the adjoining sites to function as vehicle access for these adjoining sites.

The widening of the entrance to service 201-209 Rocky Point Road also raises concerns regarding the viability of the active street frontage along Ramsgate Road. A small shopfront is sandwiched between two sets of two-way driveways. Ramsgate Road is a busy local road and considered to be a high exposure location. The dominance of driveways in the proposed scheme is inconsistent with the strategic intent of activating the Ramsgate Centre. In addition, the use of a vehicle/pedestrian shared way presents numerous challenges in terms of management and conflicts.

A consolidation of vehicle access at the eastern site boundary needs to be explored to create the required access to 201-209 Rocky Point Road.

- Access Plan for Waste Collection

The Access Plan Diagram/swept path analysis will need to be amended for the Service Vehicles with the following provisions:

- a) Analysis for a 10.5m waste service vehicle (and not an SRV); including the dimensions of the service vehicle as mentioned before and repeated again:
- b) *Applicants should ensure height clearance of 4 metres can be provided, allowing for vehicle length of 10.5 metres and width of 2.5 metres*  
(<https://www.georgesriver.nsw.gov.au/Services/Waste/Waste-Management-Planning>).
- c) Outline existing on-street parking space and potential parked vehicles during ingress/egress.
- d) Outline the travel path/ lane on the roadway.
- e) Outline swept path analysis in the property internally as well

### Conclusion

Although it is acknowledged that some positive changes have been made to the concept, concerns remain across a number of key areas which warrant substantial changes to the overall proposal. The overall built form, height and setbacks will require significant amendments to adequately address the concerns raised in the letter and obtain support, particularly on a site specific merit basis .

A revised suite of documents should be submitted addressing the above, including any additional plans and diagrams that have been requested.

On hand to discuss and provide further clarification if required.

Yours sincerely



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Attachments:

- Preliminary Assessment Letter issued to Council 29 November 2021

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**Attachment A**  
Preliminary Assessment Letter  
issued to Council 29 November  
2021





Our ref: **PS127427**

29 November 2021

Harkirat Singh  
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Dear Harkirat

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

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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

Yours sincerely,



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