

Thursday, May 30, 2024

Woolworths
1 Woolworths Way
Bella Vista NSW 2153

Attention: Nick Steele, Corporate Property

Dear Nick,

**RE: RAMSGATE VILLAGE – PLANNING PROPOSAL - 193-199 ROCKY POINT ROAD
HERITAGE COMMENTARY ON ADDITIONAL DESIGN CHANGES**

In 2023 a Planning Proposal seeking to amend the *Georges River Local Environmental Plan (LEP) 2021* by rezoning the land and amending the applicable built form controls was lodged by Woolworths Property on the site at 193-201 Rocky Point Road, 66-68 Ramsgate Road and 2-4 Targo Road, Ramsgate. The site is located adjacent to two heritage items identified on Schedule 5 of the *Georges River Local Environmental Plan (LEP) 2021*, namely:

- 70 Ramsgate Road, Ramsgate (Residential flat building, "Roma") – Item No: I145;
and
- 211-219 Rocky Point Road, Ramsgate (Shops) - Item No: I416.

This heritage commentary has been prepared to review design changes made to the scheme in response to a review of the scheme undertaken by Edwards Heritage Consultants Pty Ltd on Council's behalf.

Overall, the scheme was supported, however Council's external heritage advisor did express concerns regarding the resulting amenity for the residents of the heritage item at 70 Ramsgate Road, 'Roma', and the visual impact of the development on views of the items, summed up as a recommendation in the letter, set out below.

Recommendation:

15. *While the Planning Proposal will alter the visual context and backdrop of the two heritage items, the appreciation of the character and relationships between the heritage items can still be appropriately managed and retained. The Planning Proposal is supported in principle, though, the following changes are required to mitigate heritage impacts:*
 - i) *The location of the proposed vehicular access driveway together with the incorporation of utilitarian service areas along the eastern elevation of 'Building C' provides a poor level of amenity and an unacceptable outcome to the adjoining heritage item. The use of this space as an access driveway to the delivery dock will also create an unacceptable acoustic impact on the occupants of the heritage item, increasing pressure for the introduction of acoustic attenuation measures along boundary fencing and / or to the heritage item itself, which in turn are likely to have an unacceptable visual and physical impact on the heritage item. The access driveway should be relocated accordingly.*

The design team has taken these concerns onboard and have made several design changes, and where a change cannot be fully made further information has been provided below to underpin the design approach.

Key Concerns:

The recommendation identifies two key issues that are considered to require mitigation to achieve an acceptable outcome for the heritage items:

1. That the proximity of the development to the heritage items will lead to a poor level of amenity, specifically acoustic amenity, and
2. That the relationship of the development and the heritage items will adversely alter the visual context and backdrop of the two heritage items.

It is acknowledged that the current proposal is to define a series of building envelopes, and that the merits of any future detailed design will be subject of future design development, review and heritage impact assessment. The reference scheme included in the application package is purely to demonstrate that a positive outcome within the proposed envelopes is achievable.

Design Response: Location of Driveway

Following receipt of the feedback the design team reviewed the location and detailed design of the eastern elevation of Building C and have updated the reference scheme accordingly to demonstrate the impact of the proposed changes.

Firstly, the location of the vehicular access location was reviewed, it was decided that this remains the preferred location for the following reasons:

1. The main frontage of the site, Rocky Point Road, carries a heavier vehicular load, making delivery off these locations more disruptive to the major traffic flows and potentially dangerous for vehicles and pedestrians.
2. The Ramsgate Road entry utilizes a shared easement with the properties to the east, therefore requiring less hard surfacing on the site and providing the amenity of a wider access to the adjacent properties at 201-209 Rocky Point Road, which Council have requested we provide within our proposal for future potential compliant development of their site.

Design Response: Envelope Form

The following design changes to the planning proposal envelope, shown in Figure 3 on the reference scheme, have been proposed to improve the visual and physical relationship to the heritage items.

1. **Setback:** The setback of the front of the building envelope is 6.0m, which generally lines up with the existing apartment buildings to the west of the site. This increases the portion of the western elevation of 'Roma' available in views from the west, enabling a greater understanding of the character and scale of the heritage item in views from the public domain.

The setback also creates a greater physical and visual separation between the proposed and existing buildings, providing greater opportunities for landscaping across the site.

2. **Building Form:** The southeastern corner of the envelope now includes a deep curved return, both softening the building envelope, increasing opportunities for the landscape to be greater, as well as opening up views to and from the western elevation of 'Roma'.

The extended views across the site arising from the curved form also increases visual surveillance for the development, as well as the properties along the shared boundary.

The upper levels of the building step back with open verandahs breaking up the bulk of the building.

3. **Materiality:** The built character of Building C has been shown as a brick building in the reference scheme, with timber detailing at the ground level wrapping around the corner and across the eastern elevation of the loading dock doors and other service areas. This approach introduces a non-industrial materiality to the building as it is viewed from the adjacent dwellings. This approach demonstrates that a contemporary building can employ a traditional and appropriate material and create a sympathetic architectural resolution that supports the visual setting of the heritage items.

This approach demonstrates that the two heritage items are able to retain their streetscape presence and presentation, without interruption or diminution.



Figure 1 - Render of the reference scheme showing the relationship of the envelope, with the additional setback, curved corner and increased landscaping, and the two heritage items on Ramsgate Road. (Source: Clarke Hopkins Clarke)



Figure 2 - Render demonstrating the prominence of the heritage item 'Roma' on Ramsgate Road due to its almost nil setback from the street edge. The reference design shows the stepping back of a portion of the upper levels in a way which softens the edge of the new development adjacent the heritage item. The material selection also demonstrates that a contemporary building can be located adjacent an existing building without adversely impacting its setting. (Source: Clarke Hopkins Clarke)

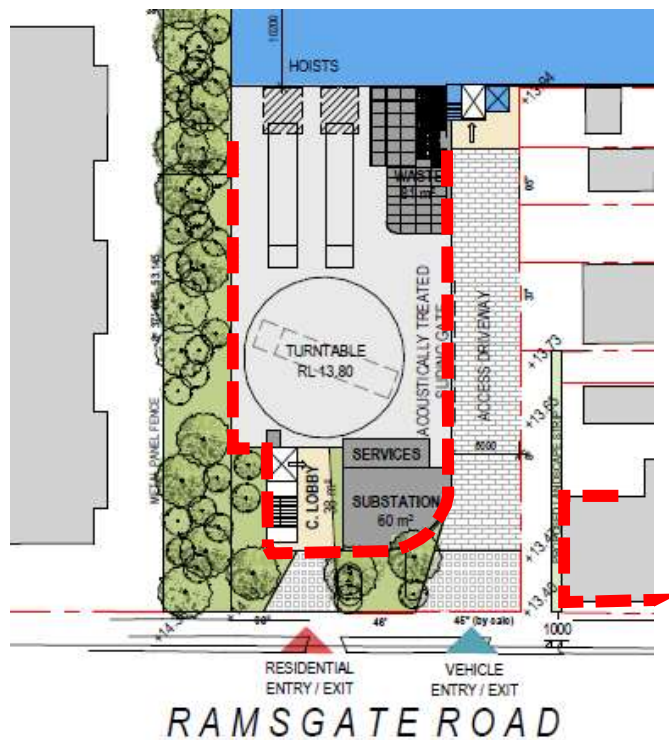


Figure 3 - Amended ground floor plan, including the rounded corner and landscape strip along the heritage item. (Source: Clarke Hopkins Clarke).

In summary, the amendments made to the planning proposal provide a greatly improved relationship to the heritage items, specifically to the residential flat building, 'Roma', at 70 Ramsgate Road.

The positive amendments include changes to the form of the proposed envelope of Building C, specifically the curved wall into the access driveway, and the stepping back of a portion of the upper levels, with balconies used to soften the built edge.

The reference scheme has been updated to demonstrate that the use of non-industrial materials to the building exterior creates an improved level of amenity for residents at the rear of the heritage item through their windows.

Whilst acoustic management is not traditionally considered a heritage impact, it is proposed that any future detailed design will include an acoustically treated sliding gate and surrounds to the delivery dock. This in conjunction with the implementation of a Plan of Management which controls the arrival times of delivery vehicles will significantly manage any acoustic issues.

For the reasons set out above, and based on the amendments to the planning proposal, we recommend that, in heritage terms, the application should be supported.

If any further information or clarification is required, please don't hesitate to contact the undersigned.

Yours Faithfully,
NBRS

A handwritten signature in black ink, appearing to read 'S. Polkinghorne', with a stylized, cursive script.

SAMANTHA POLKINGHORNE
Director

APPENDIX A: Heritage Advisor Referral

Edwards Heritage Consulting Pty Ltd, dated 18 January 2024

Heritage Advisor Referral



To: Katerina Manos / Molly Porter
From: Michael Edwards – Heritage Advisor
Application No.: PP2024/0001
Date: 18 January 2024
Address: 193-199 Rocky Point Road, 66-68 Ramsgate Road & 2-4 Targo Road, Ramsgate

Development proposal:

1. The Planning Proposal seeks to amend *Georges River LEP 2021* by rezoning the land and amending the applicable built form controls to enable the redevelopment of the site for the mixed-use 'Ramsgate Village' development comprising residential and retail uses, as well as public open space.

Reason for the Heritage Referral:

2. The Planning Proposal has been referred for heritage advice and comment as the subject site is within the vicinity of the following items of heritage significance listed under Schedule 5 of *Georges River LEP 2021*:
 - i) 'Residential flat building "Roma"' 70 Ramsgate Road, Ramsgate (Item No.1294)
 - ii) 'Shops' 211-219 Rocky Point Road, Ramsgate (Item No.1295)

Statement of Cultural Significance:

3. The Statement of Cultural Significance is reproduced from the citation for the heritage listing on the NSW State Heritage Inventory database as follows:

4. 'Roma'

'70 Ramsgate Road is significant at a Local level for its aesthetic and streetscape contribution and historic value. Prominently located in Ramsgate Road, the place is a relatively rare representative example of a two-storey Inter-War Art Deco style residential flat building within the Kogarah LGA. The place is stylistically similar to adjacent shops located around the corner at 211-219 Rocky Point Road and as a group they have considerable and comparatively rare aesthetic and streetscape significance in the LGA. Integrity is somewhat compromised by alterations and additions including in-filled balconies, replacement of leadlight windows and new front door. Together with contemporary buildings in the locality, 70 Ramsgate Road, Sans Souci provides evidence of the evolution of residential development within the Targo Estate in the Inter-War Period. The place has historic associations with the locally well-known Pittorino Brothers, who developed the site, and were instrumental in establishing the Ramsgate shopping precinct.'

5. 'Shops'

'211-219 Rocky Point Road is significant at a Local level for its aesthetic and streetscape contribution, and historic value. Occupying a prominent corner location, these 1930's two storey brick and tile shops/residential flat building are an excellent representative example of the Inter-War Art Deco style. Although the shopfronts have been altered over the years, the exterior above street awning level is substantially intact. These shops/residential flat building, together with 70 Ramsgate Road around the corner, are a local landmark and make a valuable contribution to the streetscape. The place has historic associations with the locally well-known Pittorino Brothers, who developed the site, and were instrumental in establishing the Ramsgate shopping precinct.'

ABN 38 650 469 211

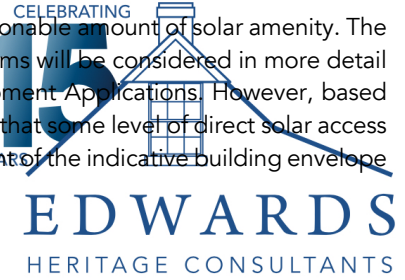
EDWARDS HERITAGE CONSULTANTS PTY LTD

19A Fitzgerald Street, Windsor | PO Box 4189, Pitt Town NSW 2756 | (02) 4589 3049
enquiry@edwardsheritage.com.au | edwardsheritage.com.au

Consideration of the Planning Proposal:

6. This Planning Proposal seeks to amend *Georges River LEP 2021* by rezoning the land and amending the applicable built form controls to enable the redevelopment of the site for the mixed-use 'Ramsgate Village' development comprising residential and retail uses, as well as public open space.
7. The Planning Proposal is essentially considered the same in quantum to a previous Planning Proposal which was lodged with Council in 2019 and refused by the Regional Planning Panel in 2021 on the grounds that the proposal did not have site-specific merit.
8. Notwithstanding, this Planning Proposal has been reviewed and it is noted that some revisions have been made to respond to previous issues raised, including the concern with the vertical height and envelope of the building presenting to Ramsgate Road and immediately adjoining the heritage item. The Planning Proposal seeks to set in place conceptual building envelopes and the merits of any specific development proposal will be considered as part of future Development Applications. Still, it is necessary to consider whether the envisaged future development resulting from the conceptual building envelopes and general site arrangements will have a harmonious relationship to the two heritage items on the site and therefore have an acceptable heritage impact.
9. Specifically, this Planning Proposal provides for an increase in the building height controls, which will envisage a larger built form by comparison to both the current building stock as well as an increase from the potential heights envisaged under the present planning controls. In principle and subject to further comments below, the increased building heights and envelopes to 'Building C' are acceptable, noting the larger future building volume is concentrated to 'Building A' and 'Building B' which are located to the north of the two heritage items and therefore, the furthest away from the heritage items.
10. The accompanying Heritage Impact Statement (HIS) provides an assessment of the anticipated impacts of the future development forms envisaged by this Planning Proposal. The HIS is supportive of the proposed increase in building height controls, the overall envelope and zoning of the land.
11. It is acknowledged that the primary elevation of the heritage items is oriented to address Rocky Point Road and Ramsgate Road, and the future development would not obscure the primary views to the two heritage items. While the visual context and backdrop of the two heritage items will be altered, the appreciation of the character and relationships between the heritage items would still be appropriately managed and retained.
12. The proposed building envelopes are centered around a public square which will 'pull the (future) buildings apart' and allow for a sense of building separation and solar amenity to the residential occupants of the building known as 'Roma'. The scale (height and envelope) of 'Building C' fronting Rocky Point Road is generally acceptable and will allow sufficient spatial separation between the buildings to not have an unacceptable sense of visual dominance to the heritage item. This is a substantial improvement to the building envelopes as previously presented under the previous Planning Proposal for the site.
13. Under the previous Planning Proposal, a corridor was incorporated along the shared boundary with the heritage item 'Roma', allowing not only spatial separation between the proposed building and the heritage item, but also for a reasonably acceptable outlook and amenity to the heritage item. Under this Planning Proposal, while the corridor will provide for spatial separation between 'Building C' and the heritage item 'Roma', this space is now effectively a utility access driveway that leads to the proposed loading dock. The entire length of 'Building C' at the ground level will comprise a substation, roller door and waste receptacles, which will have a non-active frontage and provide poor amenity and outlook for the occupants of the heritage item, particularly as the private open spaces of 'Roma' are oriented to the rear of the building and there are windows incorporated into the western side elevation of the heritage item providing outlook to the proposed utilitarian access driveway. The anticipated acoustic impacts from this space will likely necessitate the introduction of a solid acoustic wall along the boundary to protect acoustic amenity of the adjoining heritage item. This will further diminish the visual amenity and outlook from the heritage item, having an unacceptable impact. There is also the potential pressure for structural and material changes to the heritage item to enhance acoustic attenuation, such as changes to fenestration and doors. Such changes are likely to have unacceptable and undesirable impacts on the heritage item.

14. It is also necessary to ensure that the occupants of 'Roma' are still afforded a reasonable amount of solar amenity. The impact of overshadowing and visual privacy and the merits of any future built forms will be considered in more detail once detailed building designs have been developed as part of future Development Applications. However, based on the 'worst case scenario', the proposed building envelopes generally indicate that some level of direct solar access will still be afforded to the heritage item, indicating that the overall form and height of the indicative building envelope to 'Building C' is acceptable.



Recommendation:

15. While the Planning Proposal will alter the visual context and backdrop of the two heritage items, the appreciation of the character and relationships between the heritage items can still be appropriately managed and retained. The Planning Proposal is supported in principle, though, the following changes are required to mitigate heritage impacts:
- i) The location of the proposed vehicular access driveway together with the incorporation of utilitarian service areas along the eastern elevation of 'Building C' provides a poor level of amenity and an unacceptable outcome to the adjoining heritage item. The use of this space as an access driveway to the delivery dock will also create an unacceptable acoustic impact on the occupants of the heritage item, increasing pressure for the introduction of acoustic attenuation measures along boundary fencing and / or to the heritage item itself, which in turn are likely to have an unacceptable visual and physical impact on the heritage item. The access driveway should be relocated accordingly.

Regards,

A handwritten signature in black ink, appearing to read 'Michael Edwards', is positioned above the printed name.

Michael Edwards B.Env.Plan, M.Herit.Cons, M.ICOMOS, JP
Heritage Advisor

ABN 38 650 469 211

EDWARDS HERITAGE CONSULTANTS PTY LTD

19A Fitzgerald Street, Windsor | PO Box 4189, Pitt Town NSW 2756 | (02) 4589 3049
enquiry@edwardsheritage.com.au | edwardsheritage.com.au

STATEMENT OF HERITAGE IMPACT

Ramsgate Village – Planning Proposal



**193-201 Rocky Point Road, 66-68 Ramsgate Road and
2-4 Targo Road – Ramsgate Village NSW**

18 DECEMBER 2023

NBRS & PARTNERS Pty Ltd
Level 3, 4 Glen Street
Milsons Point
NSW 2061 Australia

Telephone +61 2 9922 2344 - Facsimile +61 2 9922 1308

ABN: 16 002 247 565

Nominated Architects
Geoffrey Deane: Reg No. 3766; Andrew Duffin: Reg No. 5602; Garry Hoddinett: Reg No 5286

This report has been prepared under the guidance of the Expert Witness Code of Conduct in the Uniform Civil Procedure Rules and the provisions relating to expert evidence.

This document remains the property of NBRS & PARTNERS Pty Ltd.
The document may only be used for the purposes for which it was produced.
Unauthorised use of the document in any form whatsoever is prohibited.

ISSUED	REVIEW	ISSUED BY
18 December 2023	Final Issue	Samantha Polkinghorne

STATEMENT OF HERITAGE IMPACT: RAMSGATE VILLAGE – PLANNING PROPOSAL

CONTENTS

1.0	INTRODUCTION	1
1.1	Background	1
1.2	Methodology	1
1.3	Site Location	2
1.4	Heritage Management Framework	3
1.5	Authorship	3
1.6	Limitations.....	3
1.7	Copyright	3
2.0	HISTORICAL CONTEXT	4
2.1	Generally	4
2.2	Outline Development of the Site	4
3.0	SITE DESCRIPTION AND CONTEXT	5
3.1	Site Context.....	5
3.2	Description of the Exteriors.....	5
3.3	Views	6
4.0	ESTABLISHED HERITAGE SIGNIFICANCE	7
4.1	Heritage Status.....	7
4.2	Significance of Items in the Vicinity	7
5.0	THE PROPOSAL.....	9
5.1	Description	9
6.0	ASSESSMENT OF HERITAGE IMPACT.....	13
6.1	Documentation Evaluated.....	13
6.2	Introduction.....	13
6.3	Overview of Potential Heritage Impacts.....	13
6.4	Evaluation of the Guidelines of the NSW Heritage Division.....	14
6.5	Heritage Objectives of the <i>Georges River LEP 2021</i>	16
6.6	Heritage Guidelines of the <i>Georges River DCP 2021</i>	16
7.0	RECOMMENDATIONS AND CONCLUSION	18
7.1	Conclusion.....	18
7.2	Recommendations	18

LIST OF FIGURES

Figure 1 – Aerial map with the subject sites shown red. (Source: NSW LPI, SIX Maps, maps.six.nsw.gov.au).....	2
Figure 2 – View down Rocky Point Road. The heritage listed buildings are indicated by the red arrows. (Source: Google Maps street view).....	5
Figure 3 – View down Ramsgate Road. The heritage listed buildings are indicated by the red arrows. (Source: Google Maps street view).....	5
Figure 4 – 66-68 Ramsgate Road, Ramsgate (Source: Google Maps street view).....	6
Figure 5 – 193-201 Rocky Point Road, Ramsgate (Source: Google Maps street view).....	6
Figure 6 – 2-4 Targo Road, Ramsgate (Source: Google Maps street view).....	6
Figure 7 – Excerpt from the Georges River LEP 2021 heritage map. Heritage items are shown brown. The subject site is shown in red. (Source: Georges River LEP 2021, Heritage Map HER_011).....	7
Figure 8 – Heritage listed buildings adjacent to planning proposal. Residential Flat Building “Roma” to the left and Shops to the right (Source: Google Maps street view).....	8
Figure 9 – Former Ramsgate Methodist Church – Ramsgate Community Church (heritage item no. 15) – heritage item physically separated from proposed site by the recent 6 storey apartment building. (Source: Google Maps street view).....	8
Figure 10 - Section AA showing the height relationships running north south across the site. (Source: Clarke Hopkins Clarke).....	9
Figure 11 - Section DD showing the height relationships running north south across the site. (Source: Clarke Hopkins Clarke).....	9
Figure 12 - Section CC running east west across the southern (Ramsgate Road) portion of the site. (Source: Clarke Hopkins Clarke).....	10
Figure 13 – Ground floor layout, showing access from Ramsgate Road to service the Woolworths store. The lots containing the heritage items are indicated by the red dashed line. (Source: Clarke Hopkins Clarke, December 2023).....	10
Figure 14 - First floor layout of residences, showing the relationship of the buildings to the heritage items, shaded blue to the south of the site. This diagram illustrates the relationship between the heritage buildings, set out on the street frontage, with the development set behind in line with the existing development to the west on Ramsgate Road. (Source: Clarke Hopkins Clarke - NBRS overlay).....	11
Figure 15 - Diagram showing the new building on Ramsgate Road is restricted to one floor higher than the heritage item, and is set back from the front of the existing buildings. (Source: Clarke Hopkins Clarke)....	11
Figure 16 - Indicative reference image for the Rocky Point Road elevation. (Source: Clarke Hopkins Clarke).....	12
Figure 17 - Indicative reference image for the Targo Road elevation. (Source: Clarke Hopkins Clarke).....	12

Figure 18 KDCP Figure 25: Beverly Park and Ramsgate (Source: Section 5.19 Georges River DCP 2021 - Part 5 Residential Locality Statements - Amendment No 3 - 27 October 2023) 17

1.0 INTRODUCTION

1.1 BACKGROUND

This Heritage Impact Statement was commissioned by Woolworths and has been prepared to investigate and assess the potential heritage impacts of a Planning Proposal to increase the allowable height and building envelope of future Ramsgate Village development located at 193-201 Rocky Point Road, 66-68 Ramsgate Road and 2-4 Targo Road, Ramsgate NSW.

The site currently comprises low rise residential and commercial properties, and is located adjacent to two heritage items identified on Schedule 5 attached to *Georges River Local Environmental Plan 2021*, namely:

- 70 Ramsgate Road, Ramsgate (Residential flat building, “Roma”) – Item No: I145; and
- 211-219 Rocky Point Road, Ramsgate (Shops) - Item No: I416.

Ramsgate is identified a key ‘Local Centre’ in the Eastern City District Plan, and as part of the Ramsgate Centre Master Plan in the Georges River Development Control Plan (GRDCP) 2021. The site is strategically located at the intersection of Ramsgate and Rocky Point Roads and would reinforce existing commercial development in the immediate area and the established public transport network in Rocky Point Road and Ramsgate Road.

This Planning Proposal is for the building envelope and does not include building detail. Details of the indicative development scheme are shown on the accompany documentation, prepared by Clarke Hopkins Clarke, dated 1 December 2023.

1.2 METHODOLOGY

This Heritage Impact Statement has been prepared in accordance with the guidelines set out in the *Australia ICOMOS Charter for Places of Cultural Significance*, 2013, known as The Burra Charter, and the New South Wales Heritage Office (now the Heritage Division of the NSW Office of Environment and Heritage) publication, NSW Heritage Manual.

Terminology used, particularly the words *place*, *cultural significance*, *fabric*, and *conservation*, is as defined in Article 1 of The Burra Charter.

This Heritage Impact Statement reviews the planning proposal in terms of the relevant heritage provisions of the *Georges River LEP 2021* and the requirements of the Georges River Development Control Plan (DCP) 2021, and the Impact Assessment Criteria guidelines endorsed by the NSW Heritage Council.

1.3 SITE LOCATION

The subject site is an irregularly-shaped parcel of land containing sixteen allotments, with street frontages addressing 193-201 Rocky Point Road, 66-68 Ramsgate Road and 2-4 Tarago Road, Ramsgate NSW as shown in Figure 1. The parcels of land comprising the site are identified in documents held by NSW Land Registry Services (LRS) as¹:

- Lot B, DP347589;
- Lots 1 and 2, DP133817;
- Lot 1 DP970852; Lot 8 DP653883;
- Lots A and B, DP311887;
- Lot 301 DP 1142822;
- Lot B DP371250;
- Lots 12, 13 and 14, DP455810;
- Lot 3 DP213885;
- SP83814; and
- SP77494.

The sites located at 207-219 Rocky Point Road and 70 Ramsgate Road are included in the study area to assess the full potential of the block bounded by Targo Road to the north, Rocky Point Road to the east and Ramsgate Road to the south. The surrounding area is characterised by one and two-storey, freestanding residential development, with one and two storey commercial development located on either side of Rocky Point Road.

The subject site, and other areas adjacent to Rocky Point Road, have been identified by the Georges River Council (west of Rocky Point Road), and Bayside Council (east of Rocky Point Road) as part of the Ramsgate Centre Master Plan. As part of the implementation of the Ramsgate Centre Master Plan, sites in the area, including the subject site, have been re-zoned for increased heights and floor space ratios, and sites amalgamated to achieve the permitted floor space ratios.



Figure 1 – Aerial map with the subject sites shown red. (Source: NSW LPI, SIX Maps, maps.six.nsw.gov.au)

¹ All sixteen parcel of land comprising the subject site are located in the Parish of St George, County of Cumberland.

1.4 HERITAGE MANAGEMENT FRAMEWORK

The subject lots are not listed as items of local heritage significance in Schedule 5 of the *Georges River Local Environmental Plan (LEP) 2021*.

The two heritage buildings located on sites adjoining the subject site and are identified as heritage items (Item No. I145 and Item No. I416) on Schedule 5 attached to the *Georges River Local Environmental Plan (LEP) 2021*, and are protected under the *Environmental Planning and Assessment Act 1979 (NSW)*:

Other heritage listed items in the vicinity of the subject site are visually and physically separated from the site by intervening development, and do not warrant assessment as part of this report.

1.5 AUTHORSHIP

This report was prepared by Samantha Polkinghorne, Director, of **NBRS**.

Section 2.0 Historical Context has been sourced from a previous report, text extracted from the earlier report are shown in italics.

1.6 LIMITATIONS

This report is limited to the assessment of potential impacts on the European cultural heritage values of the site and does not include natural, Aboriginal and/or archaeological assessment. This report only addresses the relevant planning provisions that relate to heritage.

1.7 COPYRIGHT

Copyright of this report remains with the author, **NBRS** Unless otherwise noted, all images are by the author.

2.0 HISTORICAL CONTEXT

2.1 GENERALLY

The following history was compiled from the history available for the two adjacent heritage listed items as found in the NSW State Heritage Inventory database, reference numbers 1870164 and 1870169.

2.2 OUTLINE DEVELOPMENT OF THE SITE

The sites are part of 39 acres originally granted to John McCall in 1854. McCall's son, also John, settled in Sans Souci in the 1880s at "Torwood", a fine home built by Thomas Wilson, and surviving at 12 Dalkeith Street. The Targo Estate subdivision occurred in 1894. The area surrounding "Torwood" was subdivided around 1946 when the house was sold to Alderman Claydon, after whom Claydon Reserve was named ("Sans Souci Peninsula"). The head of Kogarah Bay was originally an "evil smelling mudflat" and plans to create a park were mooted by Council as early as 1880's. The shopping area at Ramsgate began to develop after 1887 because it was a major stop for the steam tram, halfway to Sandringham. It was given stimulus when the causeway across Kogarah Bay was constructed in 1906 and Ramsgate Road was extended to Botany Bay in 1907.

In 1911, there was no development listed in the block Ramsgate Road to Targo Road. Several houses appeared from 1912, and in 1913, the first shop is listed: Mrs P Turner - fruiterer. The current structure at 201-205 claims to have been built in 1929 by Pittorino Brothers. The Pittorino Brothers fruiterers were trading on the site from 1917, taking over from Mrs P Turner. In 1914, Stevens Real Estate Agent was established here also. By 1930, the block incorporated the Ramsgate Post Office, a grocer, meat market, draper, estate agent, mixed business, chemist, hardware surgery and garage. At this time the corner was occupied by a public telephone, the existing group (211-219) was constructed after 1933. The shops were built as a result of continuing growth of the community in the early twentieth century associated with increasing suburbanisation of the area.

In 1936, J Pittorino applied for permission to build new shops, residence and flats on Rocky Point Road. The Roma Flats were built that year by Pittorino Bros. together with Venice Flats at the corner of Rocky Point Road. The 1938 Valuation Books show three shops, two flats and two garages owned by Giuseppe Pittorino on the site, describing the property as 'Roma, Block Flats, garage shed'.

3.0 SITE DESCRIPTION AND CONTEXT

3.1 SITE CONTEXT

The area between Ramsgate, Rocky Point and Targo Roads, is characterised by a mostly flat topography and a mix of one to 4 storey commercial and residential development from a variety of periods.



Figure 2 – View down Rocky Point Road. The heritage listed buildings are indicated by the red arrows. (Source: Google Maps street view).



Figure 3 – View down Ramsgate Road. The heritage listed buildings are indicated by the red arrows. (Source: Google Maps street view).

3.2 DESCRIPTION OF THE EXTERIORS

The subject site comprises 16 lots facing 3 roads. The lots facing Ramsgate Road contain two single level houses dating from the 1950s or 1960s. The lots facing Rocky Point Road contain a mix of residential and commercial development between 2 and 4 storeys, dating mostly from the late 20th century. The lots facing Targo Road contain 3 single and double storey houses also dating from the late 20th century.

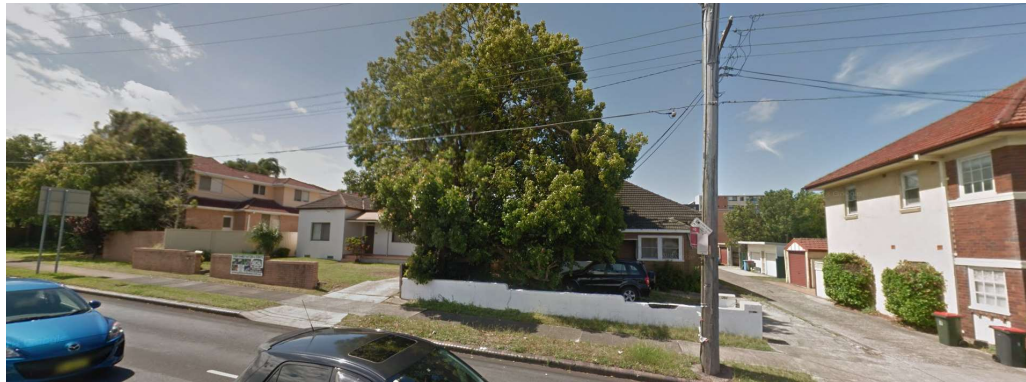


Figure 4 – 66-68 Ramsgate Road, Ramsgate (Source: Google Maps street view)



Figure 5 – 193-201 Rocky Point Road, Ramsgate (Source: Google Maps street view).



Figure 6 – 2-4 Targo Road, Ramsgate (Source: Google Maps street view).

3.3 VIEWS

Primary views of the heritage listed properties on the corner of Ramsgate and Rocky Point Roads are those of the main facades as seen from the two roads as one approaches the buildings. There are no distant views or vistas available from, or of, the subject site due to the flatness of the local topography.

4.0 ESTABLISHED HERITAGE SIGNIFICANCE

4.1 HERITAGE STATUS

The subject lots are not listed as items of local heritage significance in Schedule 5 of the *Georges River Local Environmental Plan (LEP) 2021*, however they are located in close proximity to two heritage listed items. Details of these are included below.

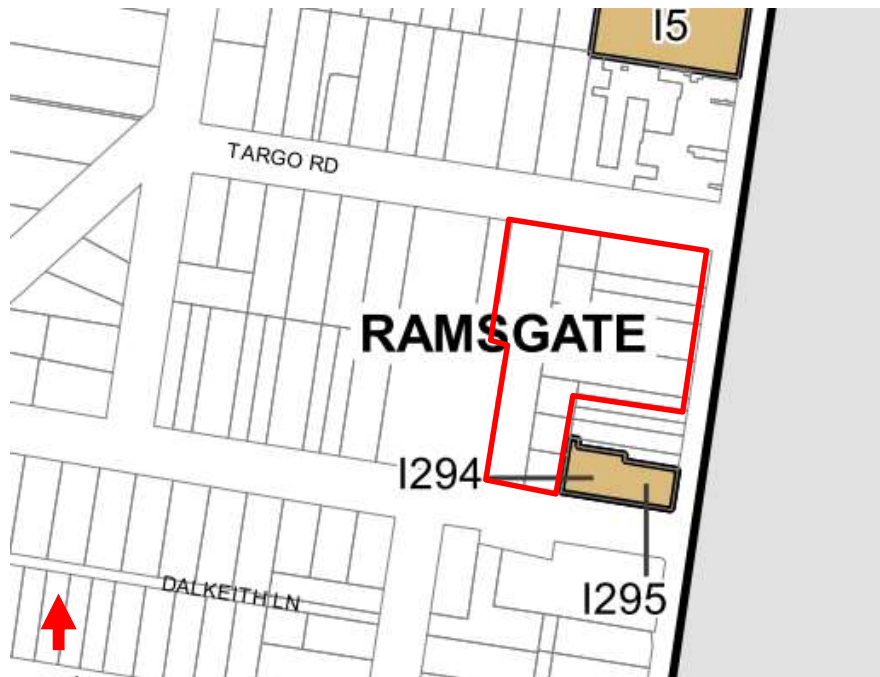


Figure 7 – Excerpt from the Georges River LEP 2021 heritage map. Heritage items are shown brown. The subject site is shown in red. (Source: Georges River LEP 2021, Heritage Map HER_011)

4.2 SIGNIFICANCE OF ITEMS IN THE VICINITY

The subject site is located in close proximity to two heritage items listed in Schedule 5 of the *Georges River LEP 2021*.

Residential Flat Building, "Roma"

The following Statement of Significance for the Residential Flat Building, "Roma", at 70 Ramsgate Road, Ramsgate, is sourced from the NSW State Heritage Inventory database, reference number 1870169:

70 Ramsgate Road is significant at a Local level for its aesthetic and streetscape contribution and historic value. Prominently located in Ramsgate Road, the place is a relatively rare representative example of a two-storey Inter-War Art Deco style residential flat building within the Kogarah LGA. The place is stylistically similar to adjacent shops located around the corner at 211-219 Rocky Point Road and as a group they have considerable and comparatively rare aesthetic and streetscape significance in the LGA. Integrity is somewhat compromised by alterations and additions including in-filled balconies, replacement of leadlight windows and new front door. Together with contemporary buildings in the locality, 70 Ramsgate Road, Sans Souci provides evidence of the evolution of residential development within the Targo Estate in the Inter-War Period. The place has historic associations with the locally well-known Pittorino Brothers, who developed the site, and were instrumental in establishing the Ramsgate shopping precinct.

Shops

The following Statement of Significance for the Shops, at 211-219 Rocky Point Road, Ramsgate, is sourced from the NSW State Heritage Inventory database, reference number 1870164:

211-219 Rocky Point Road is significant at a Local level for its aesthetic and streetscape contribution, and historic value. Occupying a prominent corner location, these 1930's two storey brick and tile shops/residential flat building are an excellent representative example of the Inter-War Art Deco style. Although the shopfronts have been altered over the years, the exterior above street awning level is substantially intact. These shops/residential flat building, together with 70 Ramsgate Road around the corner, are a local landmark and make a valuable contribution to the streetscape. The place has historic associations with the locally well-known Pittorino Brothers, who developed the site, and were instrumental in establishing the Ramsgate shopping precinct.



Figure 8 – Heritage listed buildings adjacent to planning proposal. Residential Flat Building “Roma” to the left and Shops to the right (Source: Google Maps street view).

Other heritage listed items in the vicinity of the subject site are visually and physically separated from the site by intervening development, and do not warrant assessment as part of this report, including the Former Ramsgate Methodist Church shown in Figure 9.



Figure 9 – Former Ramsgate Methodist Church – Ramsgate Community Church (heritage item no. 15) – heritage item physically separated from proposed site by the recent 6 storey apartment building. (Source: Google Maps street view).

5.0 THE PROPOSAL

5.1 DESCRIPTION

This planning proposal seeks to amend the existing controls under the *Georges River LEP 2021* relating to land use zoning, height of buildings and floor space ratio as they apply to the site. The proposal controls are represented by an indicative architectural scheme prepared by Clarke Hopkins Clarke, dated December 2023, which includes the following:

- Demolition of all existing buildings;
- Construction of 2 basement levels;
- Construction of 1 three storey building fronting Ramsgate Road, and 1 building fronting the north eastern corner of the site, with commercial development across the ground floor and two six storey residential towers above.
- The site uses include retail, residential and communal rooftop uses.

The aim of the proposal is to provide allowance for the future development of the site. Future Development Applications will address detailed design, articulation and materiality of the development.

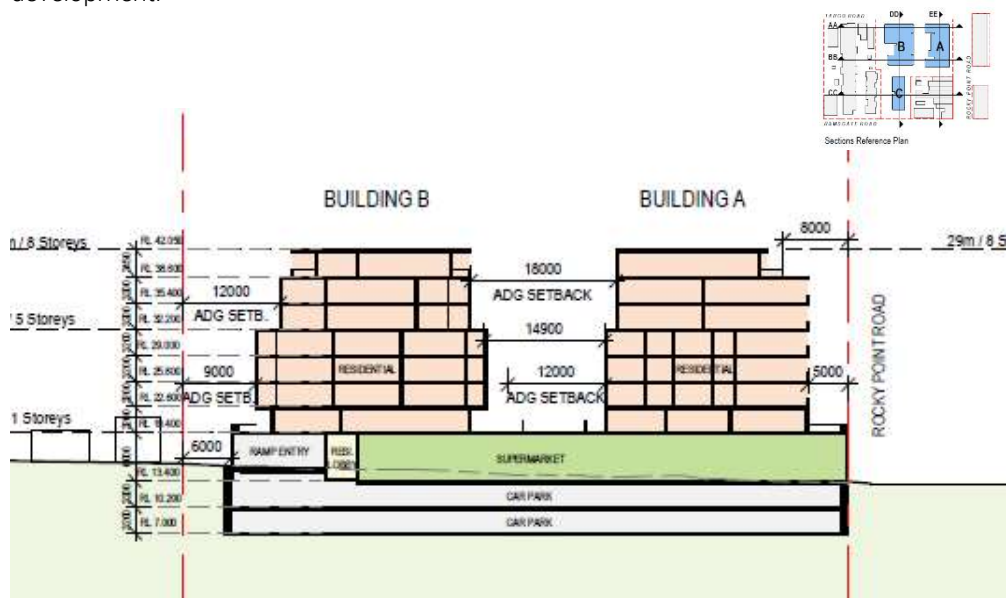


Figure 10 - Section AA showing the height relationships running north south across the site. (Source: Clarke Hopkins Clarke)

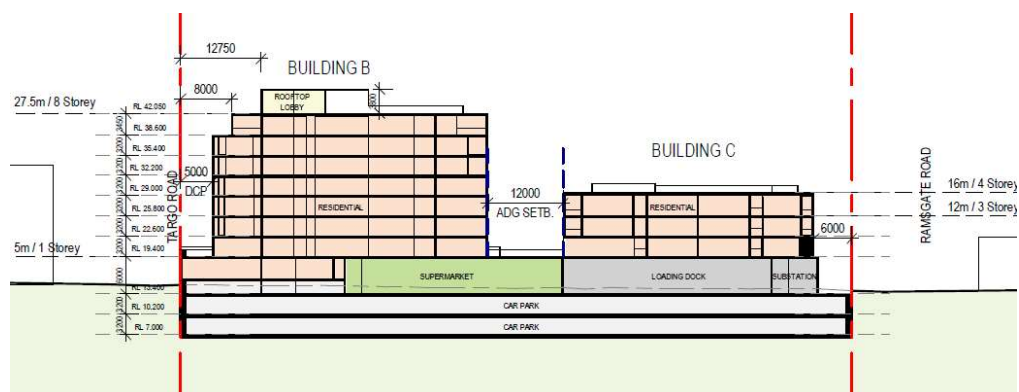


Figure 11 - Section DD showing the height relationships running north south across the site. (Source: Clarke Hopkins Clarke)

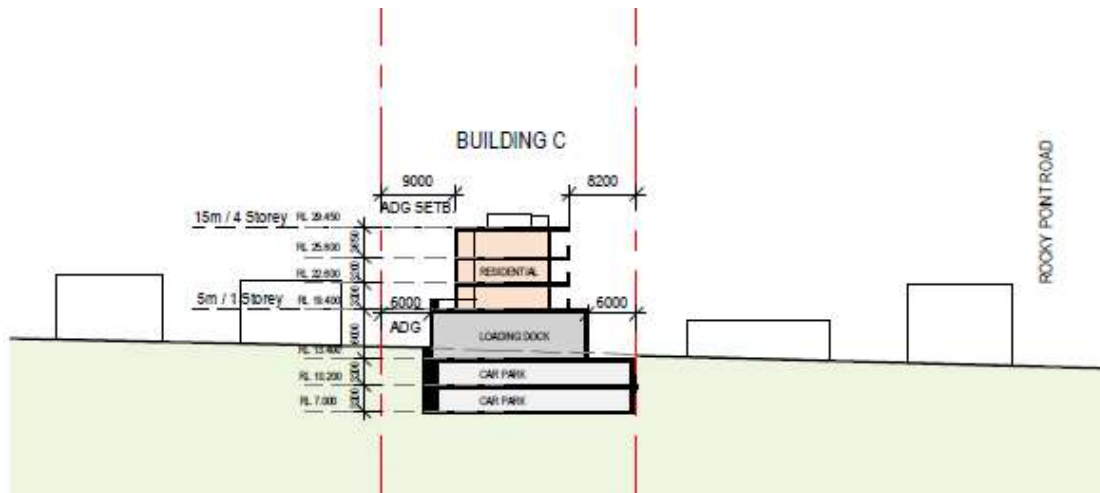


Figure 12 - Section CC running east west across the southern (Ramsgate Road) portion of the site. (Source: Clarke Hopkins Clarke)

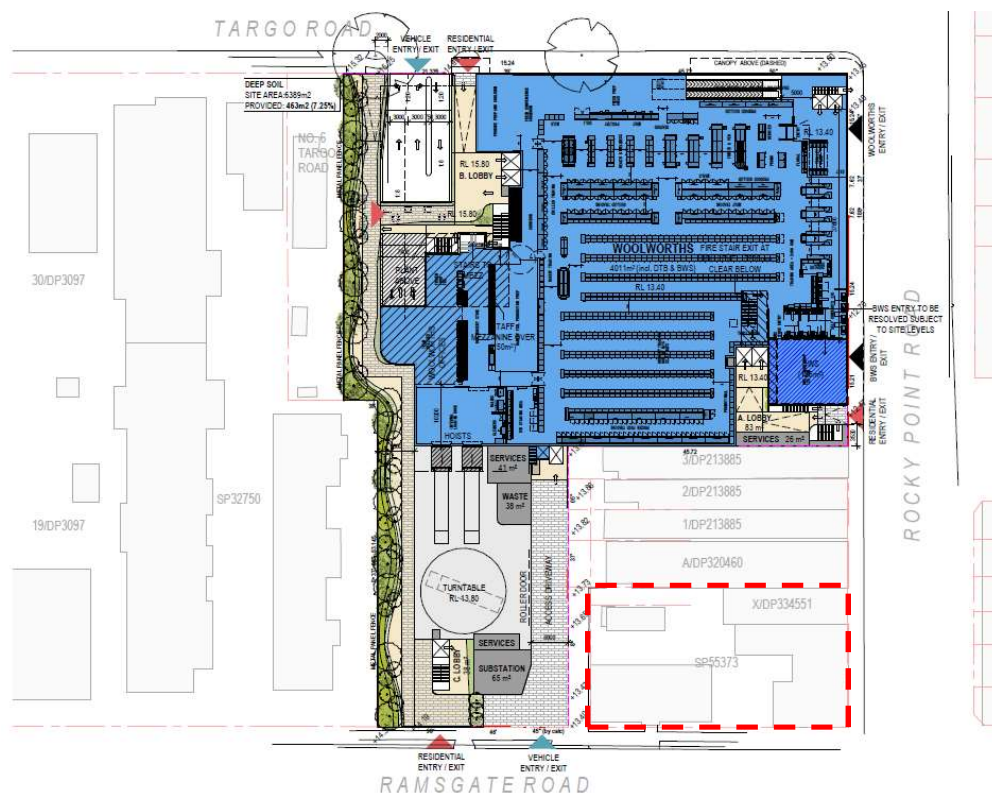


Figure 13 – Ground floor layout, showing access from Ramsgate Road to service the Woolworths store. The lots containing the heritage items are indicated by the red dashed line. (Source: Clarke Hopkins Clarke, December 2023)



Figure 14 - First floor layout of residences, showing the relationship of the buildings to the heritage items, shaded blue to the south of the site. This diagram illustrates the relationship between the heritage buildings, set out on the street frontage, with the development set behind in line with the existing development to the west on Ramsgate Road. (Source: Clarke Hopkins Clarke - NBRS overlay)



Figure 15 - Diagram showing the new building on Ramsgate Road is restricted to one floor higher than the heritage item, and is set back from the front of the existing buildings. (Source: Clarke Hopkins Clarke)



Figure 16 - Indicative reference image for the Rocky Point Road elevation. (Source: Clarke Hopkins Clarke)



Figure 17 - Indicative reference image for the Targo Road elevation. (Source: Clarke Hopkins Clarke)

6.0 ASSESSMENT OF HERITAGE IMPACT

6.1 DOCUMENTATION EVALUATED

Details of the indicative development scheme have been prepared by Clarke Hopkins Clarke, dated December 2023.

The Planning Proposal that is the subject of this application is for the building envelopes only and does not include an architectural proposal. A future application detailing a specific detailed design would be the subject of a future development application.

6.2 INTRODUCTION

This Statement of Heritage Impact has been prepared in relation to the following impact assessment criteria: the *Georges River Local Environmental Plan (LEP) 2012*, the *Georges River Development Control Plan (DCP) 2021* and the New South Wales Heritage Office (now NSW Heritage Division) guidelines, *Altering Heritage Assets* and *Statements of Heritage Impact*, contained within the NSW Heritage Manual.

6.3 OVERVIEW OF POTENTIAL HERITAGE IMPACTS

PROPOSED WORKS	HERITAGE IMPACT
Construction of one 3 storey building fronting Ramsgate Road, and one building fronting the northeastern corner of the site, with commercial development across the ground floor and two six storey residential towers above.	<ul style="list-style-type: none"> Acceptable heritage impact <p>The proposal for high rise development along Rocky Point Road is consistent with ribbon development along the main road which currently operates as the local commercial road for the suburb.</p> <p>The proposed setbacks and decision to break the larger building into two tower forms assist in mitigating any adverse visual impacts. More importantly, the larger built form is set well to the north of the heritage items, and as such any adverse visual impacts from potential looming or distracting from an appreciation of the Ramsgate and Rocky Point Road views of the items is avoided.</p> <p>The proposed buildings are taller than the adjacent existing buildings and do overshadow the heritage buildings, however contemplated development to the site in line with the current planning controls would have a similar overshadowing impact.</p>
Retention of primary views to the heritage buildings.	<ul style="list-style-type: none"> Acceptable heritage impact <p>The two heritage items are located to southeast of the subject site, with their principal elevations designed to address Ramsgate Road and Rocky Point Road.</p>

	<p>Primary views of the heritage buildings are those of the main facades as seen from the public domain. There are no distant views or vistas.</p> <p>There would be no change to the primary views to either heritage item as a result of this planning proposal. The proposed buildings will not block these views, and while the visual context will be altered, the appreciation of the character and relationships between the heritage items will be retained.</p> <p>This Planning Proposal seeks to increase the height of development near the southwest corner of Rocky Point Road with Targo Road, thereby minimising the footprint of the development and increasing the area of open public space at ground level.</p>
--	---

6.4 EVALUATION OF THE GUIDELINES OF THE NSW HERITAGE DIVISION

The following assessment is based on the assessment criteria set out in the NSW Heritage Office (now Heritage Division) publication 'Statements of Heritage Impact', contained within the NSW Heritage Manual. The standard format has been adapted to suit the circumstances of this application.

The following aspects of the planning proposal respect or enhance the heritage significance of the item for the following reasons:

- a) There are no physical or visual impacts that reduce the ability to appreciate or understand the architectural character of the heritage items nor their streetscape setting.
- b) The planning proposal would not affect views to the main facades of the two heritage items located adjacent to the development.
- c) The increased height would be located on the northeast section of the subject site to minimise adverse impacts on the heritage buildings and residential development adjoining the western boundary of the site. The planning proposal has been developed to locate the main built form to the northeast corner of the sit, with a smaller scaled building adjacent the heritage items on Rocky Point Road.

The following aspects of the proposal could detrimentally impact on heritage significance. The reasons are explained as well as the measures to be taken to minimise impacts:

- a) The site of the heritage items, and those immediately to its north addressing Rocky Point Road, are zoned for development up to twenty-one metres in height as part of the Ramsgate Centre Master Plan. This Planning Proposal would

increase the height of the northeast section of the site, allowing development to be concentrated away from the heritage items and residential development adjoining the western boundary of the subject site. The planning proposal would enable a more articulated skyline in views to the Ramsgate Village site, identifying the location of the site in progressive views along Rocky Point Road and Ramsgate Road.

- b) The visual dominance of the additional height would be diminished over time as the surrounding low-rise development is progressively redeveloped commensurate with the scale and density allowable under the *Georges River LEP 2021*.
- c) This Planning Proposal would increase the height of development at the northeast section of the site, thereby allowing development to transition down to the adjacent heritage items and residential development.

6.4.1 NEW DEVELOPMENT ADJACENT TO A HERITAGE ITEM (INCLUDING ADDITIONAL BUILDINGS AND DUAL OCCUPANCIES)

- *How is the impact of the new development of the heritage significance of the item or area to be minimised?*
- *Why is the new development required to be adjacent to heritage item?*
- *How does the curtilage allowed around the heritage item contribute to the retention of its heritage significance?*
- *How does the new development affect views to, and from, the heritage item? What has been done to minimise negative effects?*
- *Is the development sited on any known, or potentially significant archaeological deposits? If so, have alternative sites been considered? Why were they rejected?*
- *Is the new development sympathetic to the heritage item? In what way (eg form, siting, proportions, design)?*
- *Will the additions visually dominate the heritage item? How has this been minimised?*
- *Will the public, and users of the item, still be able to view and appreciate its significance?*

Comment:

This planning proposal would result in a varied height limit across the site, with the northeast section of the subject site increased in height. This would enable development to be concentrated at the corner of Rocky Point Road and Targo Street, and to step down future development to the heritage items located near the corner of Ramsgate Road.

The indicative building envelope would increase the existing overshadowing of adjacent sites including the two heritage buildings. High rise development along Rocky Point Road is in keeping with the history of the area which currently operates as the local commercial thoroughfare for the suburb. Planning documents should ensure that increasing density can result in good urban outcomes.

The proposal minimises the impact of nearby higher urban development by breaking down the mass of the larger building into two slimmer tower forms, and the Ramsgate Road building is significantly smaller, acknowledging the scale of the heritage items. Detailed design of the buildings has not been completed, but sympathetic materials and colours could be used to further minimise the impact on the heritage items.

6.5 HERITAGE OBJECTIVES OF THE GEORGES RIVER LEP 2021

The proposed development is considered to be acceptable, from a heritage perspective, for the following reasons:

- The works would not involve the removal of identified heritage items or heritage fabric,
- Retains views to and from the existing heritage items from Rocky Point and Ramsgate Roads.
- The proposal will increase the number of visitors to the area and therefore increase the likelihood of the continued use of the items with their historical use.
- The massing of the proposal has been stepped up away from the heritage items to reduce any visual impact on the items.

The proposal is, therefore, considered to be consistent with the relevant heritage objectives of the *Georges River LEP 2021*, which are:

5.10 Heritage conservation

(1) Objectives

The objectives of this clause are as follows:

- (a) *to conserve the environmental heritage of the Georges River local government area,*
- (b) *to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*
- (c) *to conserve archaeological sites,*
- (d) *to conserve Aboriginal objects and Aboriginal places of heritage significance.*

6.6 HERITAGE GUIDELINES OF THE GEORGES RIVER DCP 2021

The Georges River DCP 2021 supports the *Georges River LEP 2021* by providing additional objectives and development controls for properties adjacent to heritage items.

The proposed development is generally consistent with the objectives of the Georges River Development DCP that relate to heritage in the vicinity and are set out in the following table:

3.7 Heritage		
3.7.6 Development in the Vicinity of a Heritage Item or Heritage Conservation Area		
Controls		Commentary
1.	<i>Respect and respond to the curtilage, setbacks, form, scale and style of the heritage item or heritage conservation area in the design and siting of new work.</i>	<p>There are no changes to the siting, visual or physical curtilage of the adjacent heritage items.</p> <p>The architectural design of the proposed development reflects contemporary commercial architecture, and does not mimic the style of the heritage items.</p> <p>The new development, as it addresses the Ramsgate Road frontage, where it will be viewed in the streetscape along side the heritage items, is markedly smaller than the main development, and so does not overwhelm or dwarf the existing items.</p>

2.	<i>Maintain significant public domain views to and from the heritage item or heritage conservation area.</i>	There are no changes to the ability to view the adjacent heritage items from either Ramsgate or Rocky Point Roads.
3.	<i>Ensure compatibility with the orientation and alignment of the heritage item.</i>	The entry to the development site and the development above does align with the prevailing allotment pattern.
4.	<i>Provide an adequate area around the heritage item to allow for its interpretation.</i>	Adequate setbacks have been provided on the development site to ensure that the heritage items can be clearly viewed, and the architectural character and physical relationship remains clearly discernible.
5.	<i>Retain original or significant landscape features that are associated with the heritage item or that contribute to its setting.</i>	With the exception of a modest hedge at 70 Ramsgate Road, there are no significant landscape elements associated with either of the heritage items, noting that they are built almost out to the street edge.
6.	<i>Protect and allow interpretation of archaeological features as appropriate.</i>	Assessment of archaeological potential or likelihood of unexpected finds is outside the scope of this report.

Comment

This planning proposal would not involve the removal or alteration of heritage items or landscape features in its immediate area. New development would be set back from the two heritage-listed buildings and be of an appropriate scale, would not obscure or alter their presentation to the street or impact views of the buildings from Ramsgate Road or Rocky Point Road.

The subject site lies on the southern edge of the map identifying the Beverly Park and Ramsgate Locality.



Figure 18 KDCP Figure 25: Beverly Park and Ramsgate (Source: Section 5.19 Georges River DCP 2021 - Part 5 Residential Locality Statements - Amendment No 3 - 27 October 2023)

7.0 RECOMMENDATIONS AND CONCLUSION

7.1 CONCLUSION

The proposal is consistent with the heritage objectives of the *Georges River LEP 2021*, and has taken into consideration the heritage recommendations contained in the *Georges River DCP 2021*. In our view, Georges River Council should have no hesitation in supporting the heritage aspects of this Planning Proposal for the following reasons:

- a) The additional height would not alter existing views to the principal elevations of the heritage items located at 70 Ramsgate Road or 211-219 Rocky Point Road, Ramsgate.
- b) The planning proposal would not affect the identified heritage significance of the heritage items located at 70 Ramsgate Road or 211-219 Rocky Point Road, Ramsgate.
- c) Future development to the Ramsgate Village site, including 193-201 Rocky Road, 66-68 Ramsgate Road and 2-4 Targo Road, would take into consideration the relevant Development Control Plan to minimise potential adverse impacts on heritage items in the vicinity including the residential flat building 'Roma' and the shops at 211-219 Rocky Point Road.
- d) The massing of the buildings has been carefully considered and is designed to avoid the dominance of the buildings over the corner heritage buildings.
- e) All existing views to and from the heritage items in the vicinity will be retained and conserved.
- f) The scheme would maintain an active street frontage along Rocky Point Road.
- g) Further strategies could be developed to mitigate potential adverse heritage impacts arising from the additional floor level during detailed design documentation for development of the site.

7.2 RECOMMENDATIONS

In the event a development is undertaken at 193-201 Rocky Road, 66-68 Ramsgate Road and 2-4 Targo Road, Ramsgate, we recommend the following strategies are considered to mitigate potential adverse heritage impacts to 'Roma' at 70 Ramsgate Road and/or the shops situated at 211-219 Rocky Point Road, Ramsgate:

- i. The design of the Ramsgate Village development should consider opportunities for the adjacent heritage items to be incorporated into the overall Ramsgate Village development to minimise their isolation and affect their future development capacity.
- ii. New development should, where possible, include materials and colours that are sympathetic to the adjacent heritage items.

Having reviewed the proposed increase in height to the Ramsgate Village development and its potential heritage impacts on 'Roma', 70 Ramsgate Road and the 'Shops' located at 211-219 Rocky Point Road, we conclude the Planning Proposal to be acceptable in heritage terms.

We therefore recommend the heritage aspects of this Planning Proposal application.

NBRS

A handwritten signature in black ink, reading 'S. Polkinghorne', with a stylized flourish at the end.

Samantha Polkinghorne
Director