



8th March 2019

Canterbury Bankstown Council
66-72 Rickard Rd
BANKSTOWN NSW 2200

Attention: Mr Kyou Won Rhee (Strategic Planner)

RE: 1-17 SEGERS AVENUE, PADSTOW- PLANNING PROPOSAL

Reference is made to the planning proposal at 1-17 Segers Avenue, Padstow which seeks to rezone the sites to B2 Local Centre, along with a height limit of 24-metres and FSR of 2.5:1.

We have had the opportunity to review the draft reports by Council' consultants, namely:

1. Urban Design Report by Olsson and associates architects, and
2. SGS Economic Review

The following response represents a co-ordinated/joint response from the project architect, Peter Smith urban design and ABC Planning P/L. Overall, we consider the reports to be well considered and generally justify the proposed zoning, height and FSR increases as sought.

1. Height

We concur with the floor to floor height calculations in the Urban design Report which recommends a height limit of 23-metres. This allows for 4.5m floor to floor for the ground level commercial/retail level, as well as 3.1m floor to floor for the next 5 levels (15.5m) as well as allowance for a 2-metre lift overrun, and site cross fall

It is clear that such height would not allow for a 7th storey but allows for ADG compliant ceiling heights and also allows for large vehicles to service the developments in a concealed manner (ie. within the building envelope). The proposed height limit also allows for a greater 1st floor to floor height for potential commercial suites. Such increased height is consistent with the provisions under 4.C.1 of the ADG.

It is understood that Council will allow lift overruns to be considered as architectural roof feature (which is excluded under the provisions of Clause 5.6 of Bankstown LEP 2015) if appropriate design consideration has been given consistent with the objectives of this clause.

We accept that within the 23m height limit a roof top communal open space at level 6 could not be provided with lift access.

We therefore support the recommendations for height under part 4.1 of the urban design report.

2. FSR

It is noted that the urban design report recommends an FSR of 2.3:1 which is below the 2.5:1 standard submitted with the proposal. In our opinion, an FSR of 2.5:1 is more appropriate for the following reasons:

- We note the recommended increase to the retail and or commercial spaces for both properties. It is considered that the recommended increase to 0.5:1 can be accommodated on both properties by converting the 4 ground floor residential units at the rear of 1-5 Segers Avenue to commercial or retail spaces. We concur with this design change as it will provide activation to the laneway to the rear of the site, in a similar manner to the spaces which adjoin the widened laneway/courtyard space.
- The ground and 1st floor professional suites at 7-17 Segers Avenue can also be expanded to achieve 0.5:1., noting that the retail and commercial space is only slightly below the recommended non-residential component. To satisfy the recommended non-residential increase, this will increase the FSR and therefore counters the recommendation to reduce the FSR.
- The assessment of FSR under 2.2 of the Urban Design Report suggests that the proposed envelope is too deep and does not achieve SEPP 65 compliant setbacks and that a development with a lesser FSR can overcome these concerns. Concerns were also raised in regard to potential snorkel apartments.
- Respectfully, the submitted proposal is merely a concept proposal which showed a single potential scheme to demonstrate that an FSR of 2.5:1 can be accommodated on the site. Our urban design report further refined the envelope – similar to the one prepared by Olsson Associates. We have reviewed the floor plans and concur with some of the recommendations that suggest increased northern setbacks (ie. 6m in the north-eastern portion of 7-17 Segers Ave). Snorkel apartments would not be permitted under the ADG and we can confirm that there was no intention to rely on apartments which would include snorkel bedroom windows.
- We also disagree with the intention to provide a 3-metre setback from the 4 level car park to the rear of the site. It is considered that the nil setback adjacent to the car park is preferred as it avoids any visual and acoustic impacts from the car park whilst also avoiding light spill. A 3-metre setback would essentially provide a 'dead zone' as any unit design would avoid having an outlook to a car park. It is also noted that the concept design does not rely on the northern orientation to the car park to achieve the solar access requirements of the ADG (70%). In contrast, the concept

scheme allows for an open aspect to the central courtyard or to the widened landscaped courtyard/laneway. The concept proposal also does not rely upon the 3-metre setback to achieve the 60% requirement for cross ventilation.

- The recommended 6-metre setback to the north-eastern boundary of 7-17 Segers Avenue can be achieved without a drastic reduction to the GFA as this can be achieved through rationalisation of the apartments along the eastern side of the site where it adjoins No. 19 SEGERS Avenue. Our modelling suggests that this can be easily achieved within the envelope proposed by Ollson Associates as the additional setback at the rear is offset by the reduced setback proposed to Segers Avenue.
- A deep soil zone and shifting of the boundary wall along the eastern side of the site where it adjoins 19 Segers Avenue can also be carried out (as recommended by the urban design report), without a reduction to the FSR as the car park contains surplus parking. We concur with the recommended landscape interface between 17 Segers Avenue and 19 Segers Avenue and confirm that this can be incorporated into any future scheme.
- The building footprint/layout for 1-5 Segers Avenue is also concurred with and it is considered that this can be carried out in an FSR neutral manner from the current scheme.
- It is considered that our FSR of 2.5:1 represents a maximum and could not be achieved unless each of the relevant ADG criteria are satisfied. It is also reiterated that the submitted scheme is concept in nature and does not represent the sole design response. The proposed FSR would also likely to avoid a potential Clause 4.6 variation to a development standard of 2.3:1.

Therefore, on the above basis, we generally concur with the recommendations of the urban design report but consider the recommended FSR reductions to be unreasonable and unnecessary.

If you require any additional information, or clarification of any of the above points, please do not hesitate to contact the undersigned on (02) 9310 4979 or via email at anthony@abcplan.com.au.

Yours sincerely,



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