

11 July 2014

The General Manager
Canterbury City Council
Via email
council@canterbury.nsw.gov.au.

Re: Submission to Planning Proposal – 642-644 Canterbury Road, 1-3 Platts Avenue and
2A, 2B, 2C and 2D Liberty Street, Belmore

I act on behalf of the owners of the above property and wish to make the following representation to Council in respect of the Planning proposal currently on exhibition to amend Canterbury LEP 2012 – Implementation of Canterbury Residential Development Strategy – Stage 1.

Council has clearly taken some care to examine the building forms and overall vitality of Canterbury Road. Among many other sites, the Planning Proposal proposes to rezone part of the subject site (shown in Figure 1 below on the south side of Canterbury Road) to B5 and to allocate a height control of 18m. For brevity, Council's proposed maps (as exhibited) have not been repeated in this submission.



Figure 1 – Air photo of the site (exhibited with Planning Proposal)

The opportunity:

An amalgamation opportunity has presented itself which will allow for the creation of a through-block laneway between Liberty Street and Platts Avenue which would dramatically enhance connectivity and permeability as the Canterbury Road corridor develops with mixed use development. The amalgamated site is illustrated below in Figure 2:

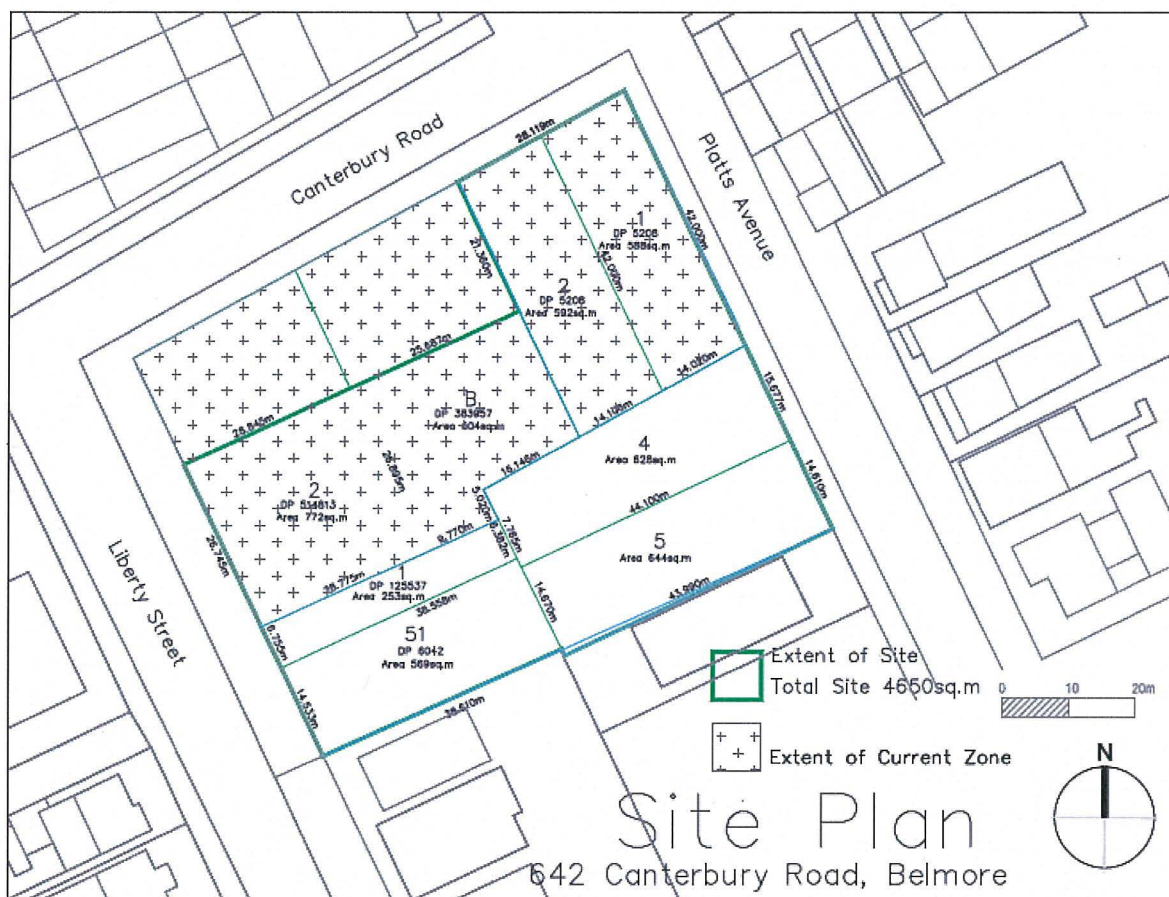


Figure 2 – Proposed site plan

Such an initiative does require a significant development yield to promote feasibility. In this case common ownership affords an opportunity to slightly increase the size of the site being considered for rezoning. This additional size then provides an opportunity to increase the height along the northern edge of the site. For completeness this rezoning suggestion and envelope assessment extends over the property at 650-658 Canterbury Road and 2 Liberty Street, along the northern edge of the site (although this is held in different ownership).

It is being requested of Council that the following changes be made in relation to this site:

1. Confirmation of proposed B5 zoning along the Canterbury Road properties.
2. Amendment to the proposed zoning boundary at the southern edge of the site.
3. Increase in the proposed height along Canterbury Rd to 25m as shown in the attached Height of Building map (amended).

In support of this submission the client has commissioned an Urban Form Study to understand possible building forms and ways to ameliorate likely impacts. This study provides building envelopes for the overall site. The adjoining site at 650-658 Canterbury Road and 2 Liberty Street can be amalgamated into the overall site or developed individually in line with this overall concept.

This Urban Form Study (illustrated later) also includes a comprehensive overshadowing analysis which has aimed to ensure that no unacceptable impact occurs on southern properties. Obviously the Part 4 assessment of the site will be more thorough in this regard. Importantly however this assessment has sought to locate the transition of building heights within the site. The street elevation study and form analysis all indicate the appropriateness of this proposed height increase within the Canterbury Road context. It should be examined in concert with this submission.

The laneway:

This proposal would allow the dedication to Council of a 6m wide road reserve connecting Liberty Street and Platts Avenue. This reserve would incorporate a one-way road carriageway, a footpath and a landscaped buffer zone.

This through-block connection will assist in alleviating traffic on Canterbury Rd and its intersections and also improve amenity in relation to the new commercial site connections that will result from the corridor upgrade.

The laneway and massing model is illustrated in Figure 3 below:

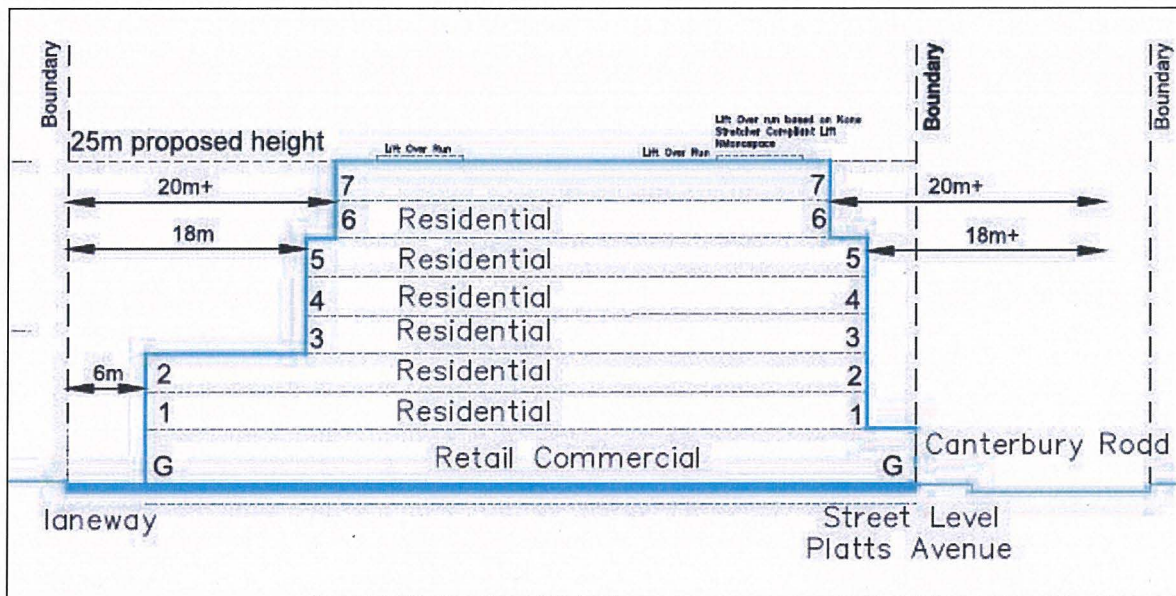


Figure 3 – Laneway elevation and building envelope massing

Building height:

The attached urban form analysis has examined building heights and also overshadowing impacts. It is well understood that Council has been examining 25m height limits along Canterbury Road for sites that are significantly large or have industrial land adjoining to the south. The principle of this is well understood. It is however considered that the size of this site and its ability to increase height along Canterbury Road without additional impact is meritorious and will allow for the laneway to be dedicated.

This proposal therefore proposes a 6m wide strip of land along the southern boundary with a 0m height limit, consolidates the 18m limit on the southern part of the developable site and suggests a 25m height limit along the northern edge of the site (measured approximately 50m from the Canterbury Road boundary). The proposed Height of Building map in Figure 4 below illustrates this.

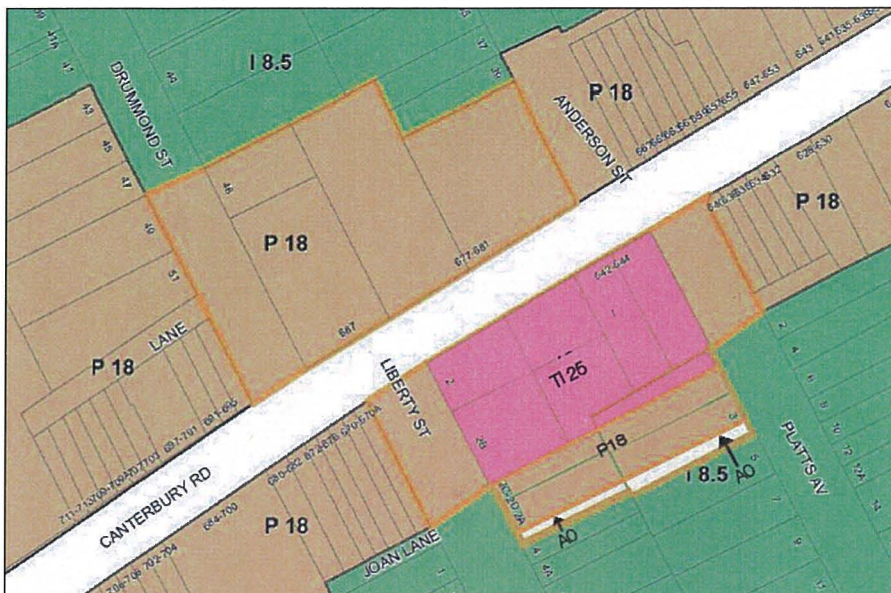


Figure 4 – Proposed Height of Building map

The increase to 25m along the northern part of the site is considered justifiable for the following reasons:

- It is comparable with the proposed heights of other larger sites along Canterbury Road.
- Council has been considering 25m limits for sites larger than 3000m² and with a 50m frontage and this site easily meets these criteria.
- Canterbury Road is sufficient wide for 25m buildings.
- The proposed building heights restrict the 25m height to the north portion of the site and negate any additional overshadowing to southern neighbours.
- A gradation of building heights down to the south will help create visual interest and also strengthen the corners along Canterbury Road, improving street legibility and promote well-established urban design principles.
- The added density will help make the laneway creation viable.
- Providing density along a transport corridor is well supported by the Metropolitan Strategy.
- The additional height to promote urban renewal for appropriate sites along Canterbury Road is well supported by the Department of Planning and Environment.
- Additional residential density in the Canterbury Road corridor will enhance the overall vitality of commercial land uses and stimulate local economic growth.

Zoning:

The site is currently proposed to be zoned B5 and R3 (as per current exhibition).

Part of this overall development proposal would require a slight change to the zoning boundary to facilitate units and the proposed laneway at the southern end of the land. It is therefore proposed to seek to extend the B5 zone over the properties at 1-3 Platts Avenue and 2A Liberty St.

This zoning issue is essentially only one of permissibility as the overall concept being sought here is clear. Clause 5.3 of the LEP aims to accommodate these minor changes however in this case the amalgamation patterns and lot layouts required mean the "relevant distance" required needs to be increased to 10m and 20m respectively. This is just beyond the reach of this provision.

Assuming this matter is resolved favourably, it is considered the easiest way is for an adjustment of the zoning boundary. The suggested zoning map is shown in Figure 5 below.

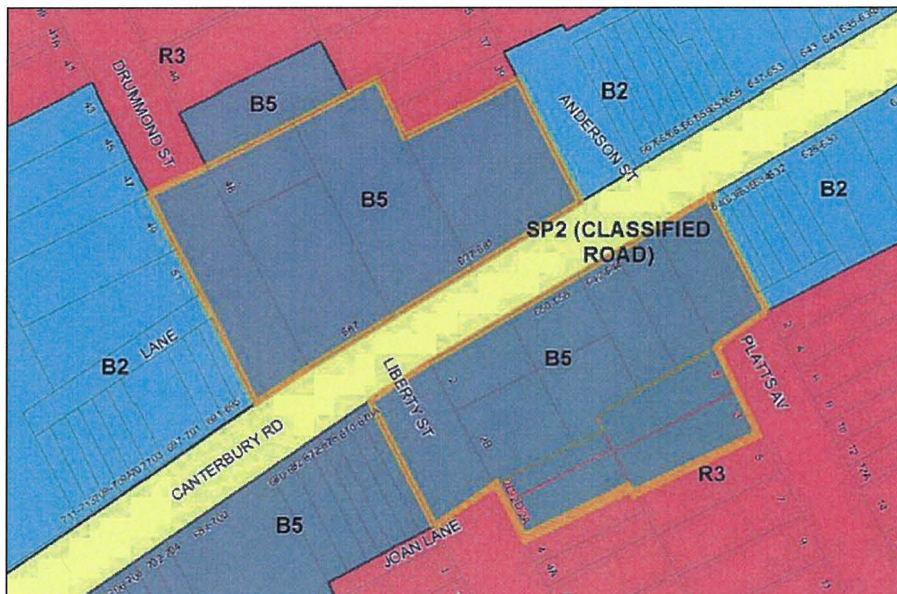


Figure 5 – Proposed Zoning map

Urban Form Study:

The following illustrations show typical building envelopes for the entire block and illustrate overall performance in terms of overshadowing impacts. Figures 6 and 7 specifically show how the two different sites within the block can be developed independently of each other.

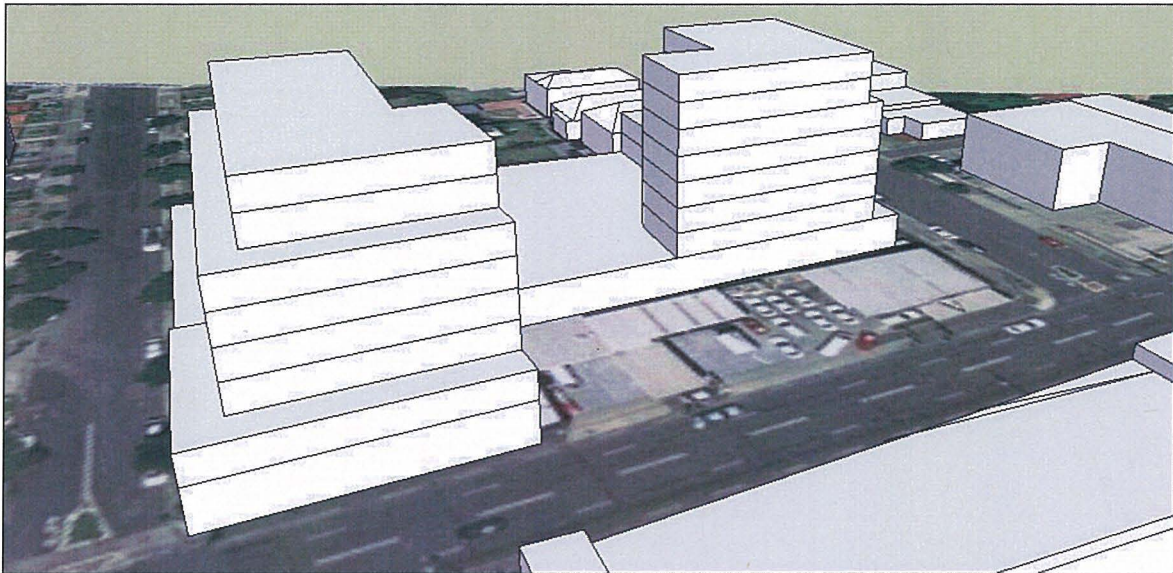


Figure 6 – Building Envelope – subject site looking south from Canterbury Road

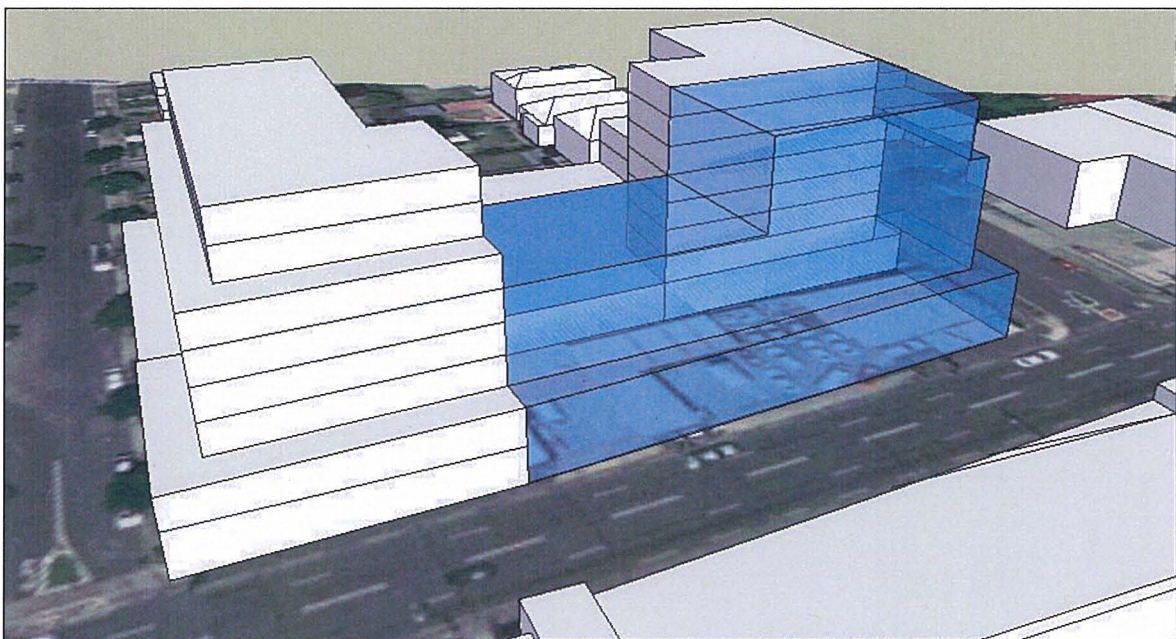


Figure 7 – Building Envelope – total block looking south from Canterbury Road

The final design solution of the overall block will depend on whether the sites are amalgamated or developed uniquely. Opportunity does exist for east-west facing units along Liberty Street and this would then allow for the northern corner site (shown in blue) to be built right up to its southern boundary and then present to the north.

Figures 8 - 14 below show the overshadowing impacts of the proposed building envelopes with particular reference to the southern residential properties. Any impact will obviously be further reduced once the building design is refined and modulated. These illustrations also show the performance of the site internally in terms of solar access.

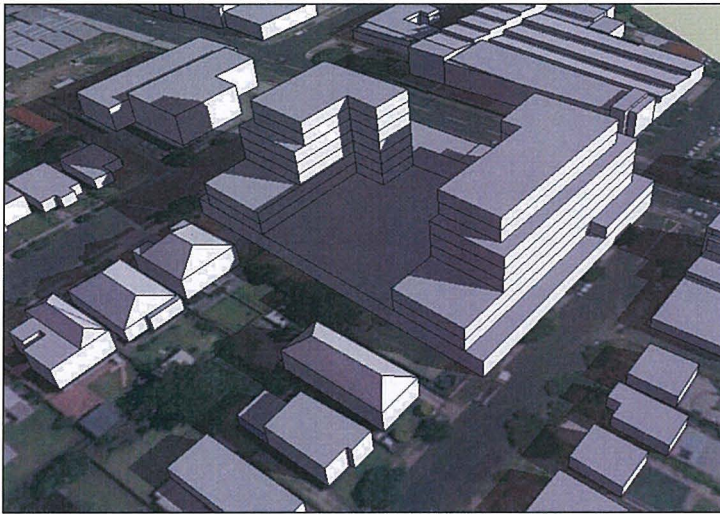


Figure 8: Shadows at 9am



Figure 9: Shadows at 10am

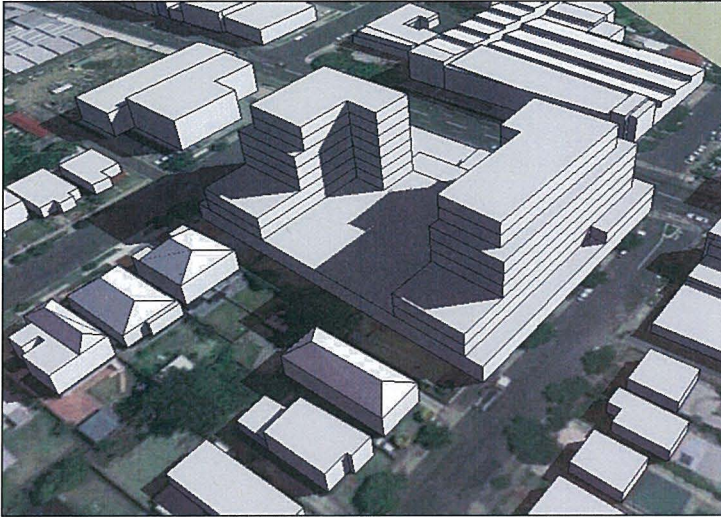


Figure 10: Shadows at 11am

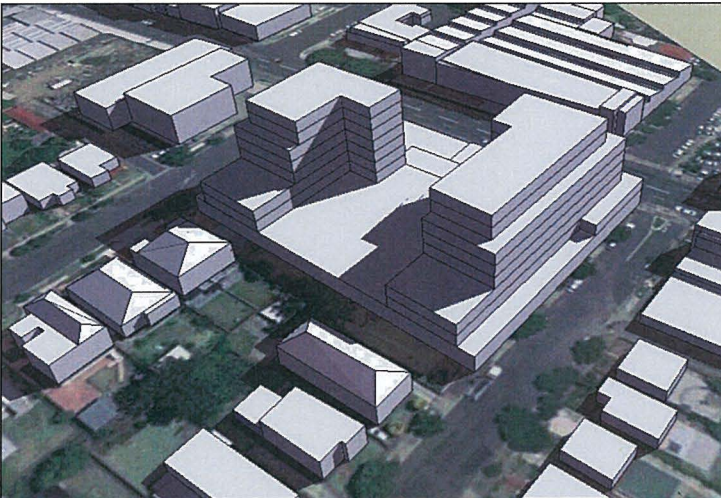


Figure 11: Shadows at midday

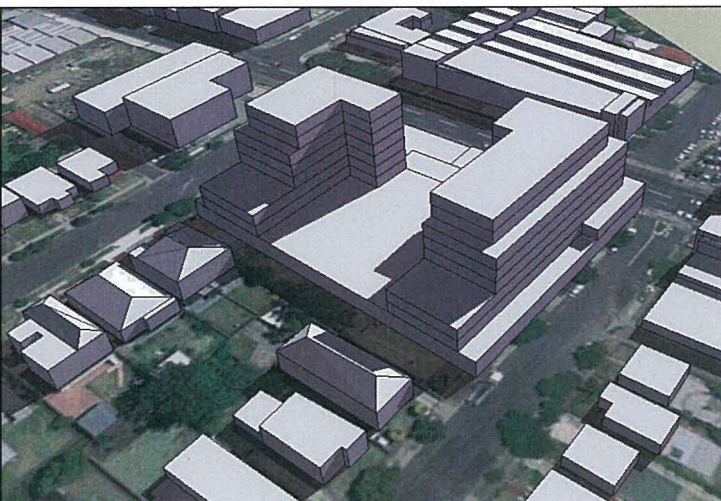


Figure 12: Shadows at 1pm

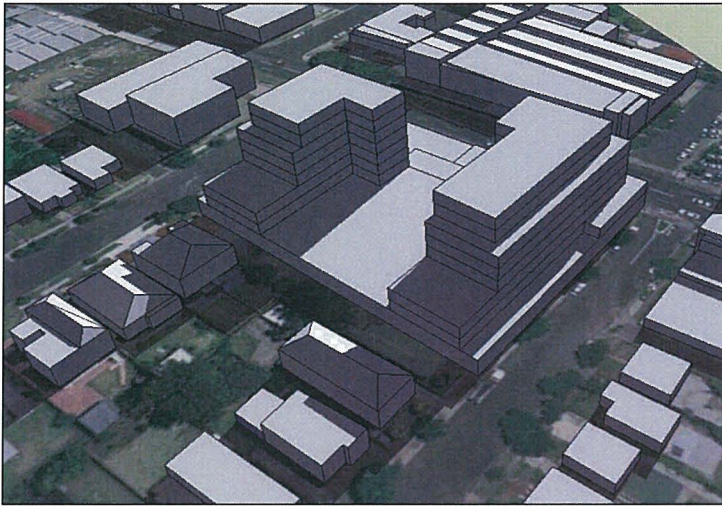


Figure 13: Shadows at 2pm

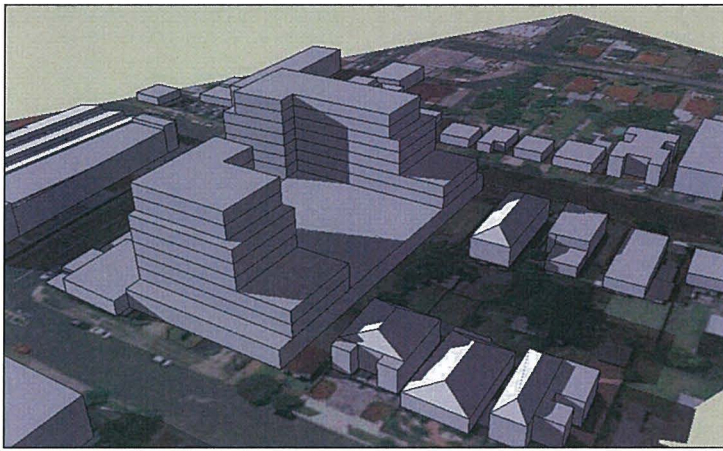


Figure 14: Shadows at 3pm

Summary:

Significantly sized sites within Sydney's suburbs are often difficult to find. This site allows for good increases in density along Canterbury Road and yet is large enough to negate any major additional impact to southern properties.

This opportunity will provide the significant public benefit of a new laneway. An initial Urban Form Study shows how the site can work and that the overall concept is appropriate in its context. Further assessment of impacts and building resolution would take place at the Part 4 Development Application stage.

Considerable merit based studies have been undertaken to provide these recommended planning controls for the site. This review of zoning is welcomed and it is hoped that these suggestions are adopted in order to create a desirable outcome for

this significant site. We therefore will be seeking an appointment with relevant council officers in the near future to discuss the process and attributes of this proposal.

Yours Sincerely,

A handwritten signature in black ink, consisting of a stylized 'T' and 'S' followed by a horizontal line.

Tim Stewart
Town Planner
DDC Urban Planning