

22 November 2023

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Attention: Gemma Bassett

Dear Gemma

**RE: Beverly Hills Town Centre – 407-511 King Georges Road, Beverly Hills
Addendum Letter**

1. Introduction

A planning proposal was lodged with Georges River Council (Council) by Beverly Hills Owners Association Incorporated for land at 407-511 King Georges Road to transform the site into a vibrant mixed-use centre. The planning proposal sought to facilitate a range of LEP amendments largely relating to FSR controls and height controls (**Previous Scheme**).

The scheme has now been updated (**Amended Scheme**) on account of the following:

- Sydney South Planning Panel has instructed that the planning proposal be revised to reduce the proposed development height and floor-space ratio (FSR).
- The Amended Scheme now includes 443-445 King Georges Road (Lots 1/DP506683, 2/DP506683, 42/DP3315 and 43/DP3315), herein referred to as **Lot M**. Lot M contains an approved 63-room hotel development with on-site parking and pick-up/ drop-off facilities (**Culvert Hotel**) lodged via a separate development application (DA2015/0289). In addition to its inclusion, the Amended Scheme further proposes to increase the building height of the Culvert Hotel from six storeys to eight storeys. The floor plan for the approved hotel generally includes 17 rooms or about 395 square metres GFA per floor (excluding the first two floors due to the foyer and associated void) and therefore an increase of two floors could result in an additional 34 rooms or about 790 square metres GFA. The amendment will align the lot with the rest of the mid-block sites and deliver consistent height on King Georges Road. The corresponding increase will remain under the maximum permissible FSR of 2:1.

As such Beverly Hills Owners Association Incorporated has engaged Stantec to prepare an addendum letter to summarise the traffic impacts of the proposed modifications. This addendum letter should be read in conjunction with the *407-511 King Georges Road, Beverly Hills Transport Impact Assessment (TIA Report)* prepared by Stantec (dated 20 October 2022) that accompanied the planning proposal.

For context, the subject site and surrounding environs is shown in Figure 1.

Figure 1: Subject site and surrounding environs



Base image source: Nearmap

2. Proposed Modification

The proposed modification involves reduction in building height and floor space ratio to deliver between 567 and 608 residential units and 11,555 square metres GFA of commercial/ retail uses (noting about 1,632 square metres GFA is already approved as part of the Culvert Hotel on Lot M, DA2015/0289, with the only Amended Scheme adding about 790 square metres or 34 hotel rooms). The yields of the Previous Scheme and Amended Scheme are summarised in Table 1 and Table 2 for retail/ commercial (including GFA associated with the Culvert Hotel) and residential uses, respectively.

Table 1: Retail/ commercial areas associated with the Previous Scheme and Amended Scheme

Lot	Retail/ Commercial (GFA m ²)		Net Difference (GFA m ²)
	Previous Scheme	Amended Scheme	
A	1,100	731	-369
B	755	457	-298
C	1,032	643	-389
D	1,140	730	-410
E	1,085	737	-348
F	1,120	739	-381
G	4,345	2,160	-2,185
H	515	336	-179
I	901	815	-86
J	550	462	-88
K	1,068	736	-332
L	405	587	182
M	Nil (separate approved DA)	1,632 (or 63 rooms) [1] 790 (or 34 rooms) [2]	790 (or 34 rooms)
Total	14,016 m²	11,555m²	-4,093m²

[1] Approved Culvert Hotel contains about 1,632m² which is now proposed to be included as part of the Amended Scheme (noting this is not additional GFA as was previously approved via a separate development application, DA2015/0289).

[2] Additional GFA associated with the Amended Scheme which proposes to construct an additional two storeys on the approved Culvert Hotel.

Table 2: Residential Units associated with the Previous Scheme and Amended Scheme

Lot	Residential				Net Difference	
	Previous Scheme		Amended Scheme		Min Yield	Max Yield
	Min Yield	Max Yield	Min Yield	Max Yield		
A	128	136	90	96	-38	-40
B	40	43	31	34	-9	-9
C	58	62	45	49	-13	-13
D	65	70	50	54	-15	-16
E	67	71	51	54	-16	-17
F	66	71	51	54	-15	-17
G	43	46	34	37	-9	-9
H	34	37	26	28	-8	-9
I	55	59	40	43	-15	-16
J	35	38	26	28	-9	-10
K	89	95	84	89	-5	-6
L	46	49	39	42	-7	-7
Total	726 units	777 units	567 units	608 units	-159 units	-169 units

Based on residential GFAs an average apartment size of 80 square metres is estimated.

As outlined in Table 1 and Table 2 the Amended Scheme would result in a reduction of 4,093 square metres GFA of retail/ commercial uses (noting this includes GFA associated with the additional 34 hotel rooms), and between 159 to 169 residential units compared to the Previous Scheme.

3. Parking Assessment

3.1 Car Parking

The car parking requirements for different development types are set out in Georges River Council DCP 2021. The following minimum parking rates apply to the proposed land uses for the site:

Retail/ Commercial

- 1 space per 60 square metres GFA.

Residential:

- 1 space per 1 and 2-bedroom units
- 2 spaces per 3 or more-bedroom units
- 1 visitor space per 5 units
- 1 car wash bay (can also be designated as a visitor space).

Hotel:

- 1 space per 5 bedrooms/ unit of accommodation.

The car parking requirements of the Previous and Amended Schemes are summarised in Table 3. Consistent with the TIA Report the residential parking requirements have been determined based on the maximum apartment yield, and an apartment mix of 25 per cent one-bedroom, 50 per cent two-bedroom, and 25 per cent three-bedroom has been assumed for this assessment.

Table 3: Minimum car parking requirements

Lot	Size			DCP 2021 minimum parking requirement [1]			
	Commercial/ retail (GFA)	Residential units	Hotel	Commercial/ retail parking	Resident parking	Visitor parking	Hotel
Previous Scheme							
A	1,100	136	-	18	170	27	-
B	755	43	-	13	54	9	-
C	1,032	62	-	17	78	12	-
D	1,140	70	-	19	88	14	-
E	1,085	71	-	18	89	14	-
F	1,120	71	-	19	89	14	-
G	4,345	46	-	72	58	9	-
H	515	37	-	9	46	7	-
I	901	59	-	15	74	12	-
J	550	38	-	9	48	8	-
K	1,068	95	-	18	119	19	-
L	405	49	-	7	61	10	-
M	-	-	-	-	-	-	-
Total	14,016 m² GFA	777 units	-	234 spaces	974 spaces	155 spaces	-
Amended Scheme							
A	731	96	-	12	120	19	-
B	457	34	-	8	43	7	-
C	643	49	-	11	61	10	-
D	730	54	-	12	68	11	-
E	737	54	-	12	68	11	-
F	739	54	-	12	68	11	-
G	2,160	37	-	36	46	7	-
H	336	28	-	6	35	6	-
I	815	43	-	14	54	9	-
J	462	28	-	8	35	6	-
K	736	89	-	12	111	18	-
L	587	42	-	10	53	8	-
M	-	-	63 rooms (approved DA) 34 rooms (additional rooms)	-	-	-	7 [2]
Total	9,133 m² GFA	608 units	97 rooms	153 spaces	762 spaces	123 spaces	7 spaces
Net Difference				-81 spaces	-212 spaces	-32 spaces	+ 7 spaces

[1] Excl. car wash bay

[2] Considering additional hotel rooms only.

Table 3 indicates the proposed Amended Scheme generates a minimum parking requirement of 153 retail/ commercial, 762 resident, 123 resident visitor and seven hotel parking spaces (on top of the approved quantum for the hotel). This requirement is 318 parking spaces less relative to the Previous Scheme (including a reduction in 81 retail/ commercial, 212 resident and 32 resident visitor parking spaces, and addition of seven hotel parking spaces).

Further detail on the proposed car parking provision and allocation between the various uses would form part of future development applications.

3.2 Bicycle Parking

The bicycle parking requirements for different development types are set out in Georges River Council DCP 2021. The following minimum bicycle parking rates apply to the proposed land uses for the site:

Retail/ Commercial

- 1 space per 5 car parking spaces.

Residential:

- 1 space per 3 dwellings for residents
- 1 space per 10 dwellings for visitors.

Hotel:

- No specific requirement outlined in the DCP 2021.

Based on the amended maximum yield of 608 units and minimum requirement of 153 retail/ commercial parking spaces, this generates a requirement of around 31 retail/ commercial bicycle spaces, 203 resident bicycle spaces and 61 residential visitor bicycle spaces. This represents a reduction of 16 retail/ commercial, 56 resident, and 22 resident visitor bicycle spaces when compared to the Previous Scheme.

Further detail on the proposed bicycle parking provision and allocation between the various uses would form part of future development applications.

3.3 Loading Requirements

Georges River Council DCP 2021 indicates the following loading requirements:

Retail/ Commercial:

- Floor area >100 square metres to 500 square metres – 1 bay
- Floor area > 500 square metres to 1500 square metres – 2 bays.

Commercial:

- Floor area 1,000 square metres to 5,000 square metres – 1 bay
- Floor area > 5,000 square metres to 10,000 square metres – 2 bays.

Hotel:

- Provision for off-street loading of buses/ taxis.

The indicative basement layouts show loading is proposed within the basement of each individual lot. The approved Culvert Hotel also includes a dedicated pick-up/ drop-off zone, which is not proposed to be altered as part of the Amended Scheme. Further details regarding on-site loading would be included as part of future development applications.

4. Transport Assessment

4.1 Traffic Volumes

Traffic generation estimates for the planning proposal have been assessed based on the maximum apartment yield, with rates sourced from the Transport for NSW Guide to Traffic Generating Developments 2002 (the Guide) and Technical Direction: Updated Traffic Surveys (TDT 2013/ 04a).

Consistent with the Section 5 of the TIA Report for the following traffic generation rates have been adopted:

- **Retail/ Commercial:** Specialty retail rate of 4.6 vehicle trips per 100 square metres gross leasable floor area (GLFA) in the weekday PM peak hour has been conservatively assumed. The traffic generation in the weekday AM peak hour has been assumed to be 50 per cent of the PM peak hour. As noted in the TIA Report, a 50 per cent reduction factor is considered applicable to reflect the proportion of trips associated with the town centre and surrounding local area residents, as well as linked trips between various land uses that make up the town centre. However, this was conservatively not applied to the TIA trip generation calculations and has therefore again been omitted.
- **Residential:** The typical 0.19 and 0.15 vehicle trips in the AM and PM peak hours have been adopted as recommended for high density residential units in TDT 2013/ 04a.

The Guide does not specify a rate for hotel uses, however, provides a rate of 0.4 vehicle trips during the PM peak hour for motels. Although motels are typically located in areas less accessible to public transport and provide limited additional services (such as shuttle buses to nearby town centres) compared to hotels, this rate has been adopted as a conservative assessment.

Traffic generation under both the Previous and Amended Schemes is summarised in Table 4.

Table 4: Traffic generation under Previous and Amended Schemes

Use	Size	Traffic generation rate (vehicle trips per hour)		Traffic generation estimates (vehicle trips per hour)	
		AM	PM	AM	PM
Previous Scheme					
Retail/ Commercial	14,016m ² GFA or 10,512m ² GLFA [1]	2.3 per 100m ² GLFA [2]	4.6 per 100m ² GLFA [2]	242	484
Residential	777 units	0.19 per unit	0.15 per unit	148	117
Hotel	-	-	-	-	-
<i>Total</i>				390	601
Amended Scheme					
Retail/ Commercial	9,133m ² GFA or 6,850m ² GLFA [1]	2.3 per 100m ² GLFA [2]	4.6 per 100m ² GLFA [2]	158	315
Residential	608 units	0.19 per unit	0.15 per unit	116	91
Hotel	34 rooms	-	0.4 per room	-	14
<i>Total</i>				274	420
Net Difference				-116	-181

[1] GLFA assumed to be 75 per cent of GFA as suggested in the Guide 2002

[2] 50 per cent reduction factor applied to consider those that walk to site and linked trips.

The proposed amendment would result in a net decrease of 116 vehicle trips during the AM peak hour and 181 vehicle trips during the PM peak hour.

Further, Section 5.1.1 of the TIA Report provides an overview of the development potential of the subject site under the current maximum FSR controls (excluding Lot M as the Culvert Hotel development is already approved). Under this scenario the subject site could potentially provide up to 8,149 square metres GFA of retail/ commercial uses and 24,047 square metres GFA of residential uses, or 301 apartments (assuming 80 square metres per apartment in line with the indicative proposed maximum yield). Considering the above, it is estimated that the indicative yield generated by the Amended Scheme could potentially result in a net increase in traffic generation of up to 75 and 80 vehicle trips during the AM and PM peak hours respectively compared to the existing planning controls for the site. Clearly, this is considerably lower when compared to the Previous Scheme.

4.2 Traffic Distribution

As discussed in Section 5.2 of the TIA Report vehicle travel paths to and from the site are relatively limited on account of Dumbleton Lane allowing for one-way southbound only traffic and the left turn only on exit to Stoney Creek Road. Rudduck Lane is also one-way westbound from Dumbleton Lane. Given this, all vehicles would need to enter Dumbleton Lane via Edgbaston Road at the northern end and either exit mid-block via Rudduck Lane or travel south for the length of the site to exit via Stoney Creek Road.

Those exiting the lots north of Rudduck Lane would be afforded other alternative routes when exiting the area to the west and avoid the need to travel through the King Georges Road/ Stoney Creek Road intersection.

The anticipated approach and departure routes are shown in Figure 2 and Figure 3, respectively.

Figure 2: Approach routes



Base image source: Nearmap

Figure 3: Departure routes



Base image source: Nearmap

4.3 Traffic Impact

The Amended Scheme would not alter access routes to/ from the subject site, however, will result in a significant reduction in vehicle trips. It is anticipated that Stoney Creek Road, Edgbaston Road and Morgan Street intersections at King Georges Road would provide for the key entry and exit routes associated with the site. Specifically, most traffic would use the King Georges Road/ Edgbaston Road intersection on entry and the King Georges Road/ Stoney Creek Road intersection on exit. Greater discussion relating to traffic impacts of the proposal is provided at Section 5.3 of the TIA Report.

Further detailed traffic modelling would be completed if and as required as part of any future development applications. Ongoing consultation with Council and TfNSW will be key to implementation of appropriate infrastructure improvements that could be delivered to support future development in line with this planning proposal.

4.4 Surrounding Development - King Georges Road (East)

Council previously investigated development on the eastern side of King Georges Road to provide similar land uses. This master plan has since been abandoned however, should it progress the following is noted:

- Vehicle routes accessing the eastern side would be similar to those accessing the western side. It is anticipated that Stoney Creek Road and Morgan Street intersections at King Georges Road would provide for the key entry and exit routes associated with the site. Edgbaston Road would also be critical for those travelling from the west.
- On approach, vehicles travelling from the south/ west are likely to use Stoney Creek Road to access the site diverting off King Georges Road early (shown in Figure 4).
- Concerns would be raised over those departing and attempting to turn right out onto Stoney Creek Road (as shown in Figure 5) with minimal gaps in traffic flows on Stoney Creek Road permitting these movements. There would also be safety concerns associated with these movements. Therefore, it is likely that vehicles would prefer to use Morgan Street to access King Georges Road. As such, high volumes would be expected through this intersection (assuming other egress means are not provided directly to King Georges Road as is currently available).

The anticipated approach and departure routes for development on the eastern side of King Georges Road are shown in Figure 4 and Figure 5, respectively.

Figure 4: Approach routes to development on eastern side of King Georges Road



Base image source: Nearmap

Figure 5: Departures routes from development on eastern side of King Georges Road



Base image source: Nearmap

The surrounding road network experiences high traffic volumes during peak periods. Naturally, development on either or both sides of King Georges Road would require further detailed traffic modelling and consultation with TfNSW to implement appropriate infrastructure improvements that could be delivered to support future development. It is likely that combined development would warrant considerable infrastructure improvements and strategies, which could include:

- intersection upgrades
- expanded clearway restrictions
- pedestrian and cyclist pathways in particular improved access to Beverly Hills Train Station
- green travel initiatives to reduce private car mode share
- strategic parking measures (minimum car share requirements, maximum parking rates introduced, etc.).

I trust the above provides a suitable assessment of the Revised Scheme. Should you have any questions, please do not hesitate to contact me directly.

Yours sincerely

Stantec Australia Pty Ltd

Brett Maynard
Senior Principal Transportation Engineer