

David Tuxford
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Georges River Council
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Attention: Harkirat Singh

**REQUEST FOR TfNSW FEEDBACK – PRE-PLANNING PROPOSAL
APPLICATION PP-2022-3899 FOR 407-511 KING GEORGES ROAD,
BEVERLY HILLS**

7 March 2023

TfNSW Reference: Syd22/01543
Council Reference: PP-2022-3899

Dear Mr Tuxford,

TfNSW appreciates the opportunity to comment on the above pre-planning proposal as referred to Transport for NSW (TfNSW) in Council's email correspondence dated 7 December 2022. TfNSW appreciates the additional time provided to make our submission.

TfNSW has reviewed the submitted documentation and notes that the planning proposal is seeking to:

- Amend planning controls to enable feasible redevelopment of the western side of King Georges Road and leverages *Council's 2020 Draft Master Plan* for the entire Beverly Hills Town Centre.
- Proposed changes include changing the building height from 15m to 44-50m and FSR from 2:1 to 4:1 – 5.5:1.

It is noted that the overarching planning strategy that outlines future development within the Beverley Hills Town Centre - the Beverley Hills Town Centre Masterplan - is still in draft form and has yet to be endorsed by Council due to acquisition issues on the eastern side of the town centre. Notwithstanding this, TfNSW understands that Council is considering planning proposals within the town centre on a case-by-case-basis and is seeking TfNSW's feedback to a site-specific planning proposal for the western side only.

Detailed comments on the proposal are provided at **Attachment A** for Council's consideration prior to Gateway Determination. Please note that the comments provided are of a preliminary nature. They are not to be interpreted as binding upon TfNSW and may change following review of the formal planning proposal referred from the appropriate planning authority.

It is strongly recommended the proponent seeks the appropriate preliminary approvals on the proposal from Council and Department of Planning and Environment prior to undertaking further detailed studies.

Thank you for the opportunity to provide advice on the subject planning proposal. Should you have any questions or further enquiries in relation to this matter, Tricia Zapanta would be pleased to receive your email via development.sydney@transport.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads "RCumming". The signature is written in a cursive style with a small dot above the 'i'.

Rachel Cumming
Director, Land Use
Greater Sydney

Attachment A: Detailed Comments on Pre-Planning Proposal for 407 – 511 King Georges Road, Beverly Hills (March 2023)

Strategic merit of the proposal

1. TfNSW notes this proposal is being considered by Council in advance of the finalisation of the draft Beverly Hills Town Centre Masterplan with planning control changes for height and FSR for land the subject of this proposal higher than those proposed in the draft masterplan. TfNSW has concerns with the strategic merit of this proposal for the following reasons:
 - The Beverly Hills Town Centre Masterplan which outlines the overarching strategic intent and objectives for redevelopment of the town centre is still in draft form and has not yet been endorsed by Council;
 - The proponent is determining the feasibility of planning control changes and urban design outcomes in isolation of other development sites in the town centre;
 - The cumulative traffic and transport impacts of future development uplift on the western side of the town centre arising from an increase in height and FSR controls has not been assessed with potential development on the eastern side;
 - An increase in development uplift on the western side also has the potential to trigger developer requests for increased height and FSR controls on the eastern side of the town centre;
 - Consideration of the western side on its own may result in partial (and ultimately staged) delivery of traffic and transport infrastructure improvements.
2. It is TfNSW's preference that Council finalise the draft masterplan for the town centre and revise the supporting Traffic Impact Assessment to include an assessment of the proposed planning control changes, if this is supported by Council.
3. TfNSW does not support the deferment of detailed network traffic modelling at the Part 4 Development Application stage due to the issues of addressing cumulative traffic and transport impacts on the surrounding road network and the associated need for identifying a package of transport infrastructure measures including timing and costs at this stage of the planning process.

Transport Planning

General

4. Increasing FSR and building heights on one side of King Georges Road is not ideal. An integrated approach to amending the planning controls in the town centre is warranted and would enable improved place outcomes.
5. Proposed increases to FSR (4:1 – 5.5:1) and building heights (44-50 metres) is not in keeping with the site's location, particularly given the width of the site. Furthermore, Beverly Hills is designated a local centre rather than a strategic centre in the [GCC South District Plan](#).
6. The proposed 2m setback on King Georges Road should be an absolute minimum. The increased footpath width provided by the setback will enable it to be designated a shared path, providing an alternative to riding on King Georges Road which has high traffic volumes and heavy vehicle movements.

Through Site Links

7. Additional through site links between Dumbleton Lane and King Georges Road are warranted to prevent community severance, particularly given the long block length between Edgbaston Road and Stoney Creek Road.
8. [Rudduck Lane pedestrian and cyclist access to King Georges Road](#) - Figure 27 of the Planning Proposal report shows this access is proposed to be retained, which is supported.

Pedestrian Access and Amenity

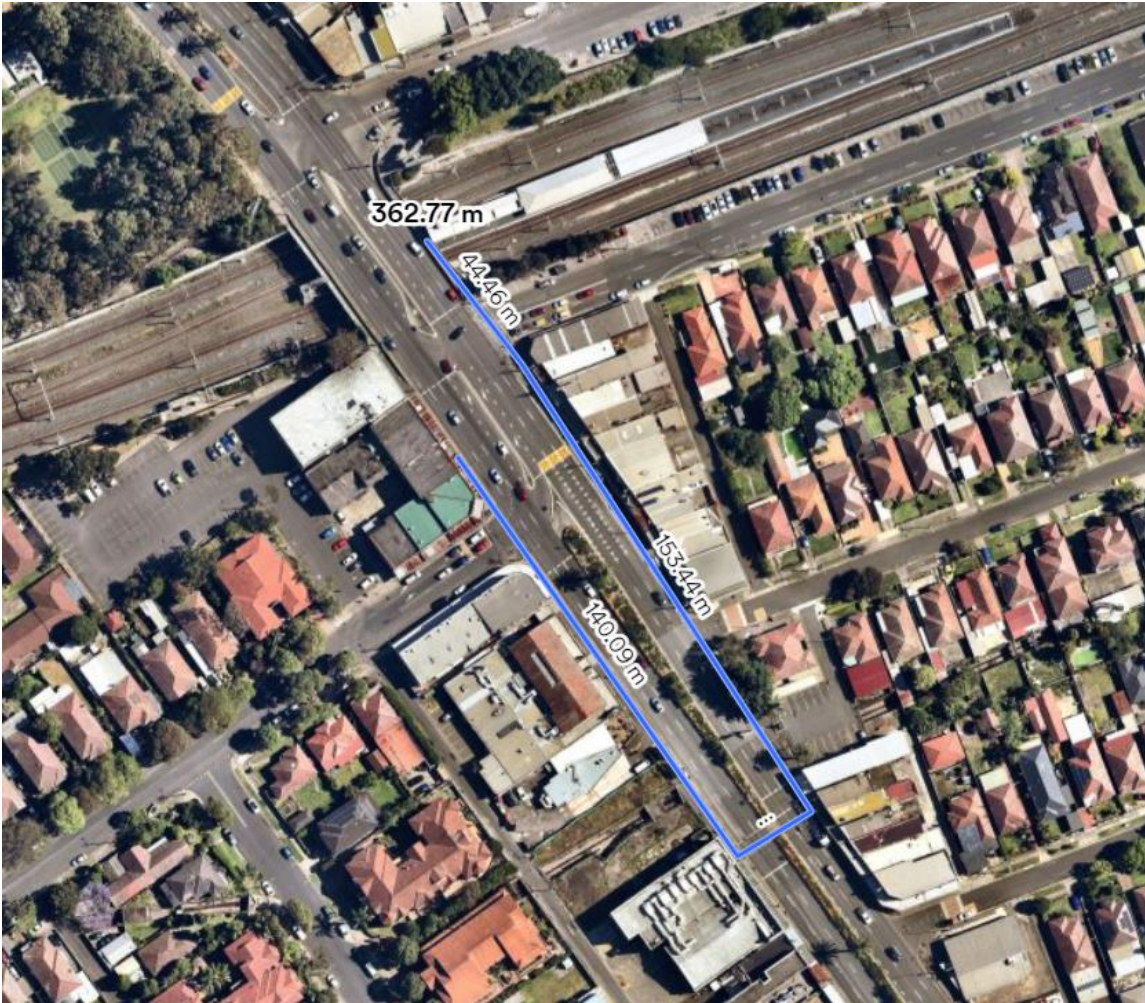
Consideration should be given to:

9. Pedestrianising Rudduck Lane between Dumbleton Lane and King Georges Road (i.e. permanently restricting motor vehicles) which would improve public domain and place outcomes.
10. Converting Dumbleton Lane to a shared zone (with 10km/h speed limit and formal priority for people walking) with two-way access permitted for cyclists in accordance with:
 - o [TfNSW Technical Direction TTD 2016/001 - Design and implementation of shared zones](#)
 - o [TfNSW Technical Direction TTD 2014/002 - Signposting for contra-flow bicycle facilities](#).

Access to Beverly Hills station

Access between Beverly Hills station and the site needs improvement, particularly for people with additional mobility needs and people with prams and bicycles as:

11. Lift access to the platforms is provided on the [eastern side of King Georges Road](#) only. There is currently [no lift access to the train station platform on the western side of King Georges Road](#).
12. No lift is proposed on the western side of King Georges Road as part of the [Beverly Hills Commuter Car Park](#) project.
13. There are no signalised pedestrian crossings of King Georges Road at the intersections of Tooronga Terrace and Morgan Street. This results in a significant detour from the northern sections of the development to access the station lift via the [signalised mid-block crossing of King Georges Road](#).



Network & Safety

14. Network modelling should be provided to assess the cumulative traffic impacts on the surrounding arterial and local road network.
15. Traffic modelling should consider a minimum of five years into the future.
16. Dumbleton Lane will need to be widened/ upgraded to accommodate the largest size vehicles expected to access the development.
17. The proponent should also undertake a parking assessment for the subject proposal utilising the Guide to Traffic Generating Developments and/or TDT 2013/04a. Assessment should be undertaken in the evening to identify the existing parking demand due to the presence of clearways along the western side of King Georges Road.
 - New and/or improved pedestrian and cycling amenities should be provided.
 - A Green Travel Plan should be developed as part of the proposal to encourage residents, patrons and staff in utilising alternative transport modes to/from the site.
18. Concern is raised with the proposed egress movement from Dumbleton Lane onto Stoney Creek Road. Due to the proximity of the traffic signals at King Georges Road/Stoney Creek Road intersection, vehicles may try to cross three lanes of traffic to get into the right turn bay. Consideration should be given to reversing the one-way arrangement to eliminate this movement.

Network Operations (Traffic signal performance)

19. Vehicular access for the lots north of Edgbaston Road (Lot K and Lot L) will likely be on Edgbaston Road. Given its proximity to the traffic signals at King Georges Road, it is also considered likely that this vehicular access will be limited to left-in-left-out only. Based on this, it is considered likely that most vehicles from Lot K and Lot L will use Edgbaston Road and Penshurst St (at the Stoney Creek Road intersection) to enter/exit the site. This does not appear to be accounted for in the traffic distribution and should be considered in a revised traffic report. Note that a concrete median will be required to be installed to facilitate the left-in / left out arrangement.
20. Based on the traffic report and existing road conditions, majority of the vehicles accessing the lots south of Edgbaston Road will use King Georges Rd/Edgbaston Rd intersection (note that King Georges Road / Edgbaston Road / Morgan Street /Tooronga Terrace intersections operate as one traffic signal). No traffic modelling was undertaken on the surrounding road network to assess the impacts of the planning proposal which has the potential to yield more than double the number of residential apartments and almost double the retail/commercial GFA permitted. As outlined above, traffic modelling is to be undertaken to identify any transport infrastructure upgrades required at nearby intersections as a result of the planning proposal. Modelling data and results (i.e. movement summaries, phasing summaries and phasing layouts) are to be provided to TfNSW's Network Operations for further review and comment.
21. TCS846 (King Georges Road/Tooronga Terrace/Morgan Street/Edgbaston Road traffic signal) is a heavily congested intersection that is always at capacity during both peak periods. Network Operations has received a number of complaints in the past and it is anticipated that traffic signal and road capacity upgrades will be required as a result of this planning proposal to mitigate potential future traffic impacts.
22. Whilst Council is not seeking comments to the draft Beverly Hills Masterplan, some general network operation comments in the context of this proposal are provided below for Council's consideration -
 - I. Proposed multistorey carpark on Edgbaston Road
 - a. As mentioned above, Network Operations has received a number of complaints regarding traffic signal TCS846, including queued traffic when entering and exiting Edgbaston Road. The proposed multi-storey car park will increase traffic volumes in this area, particularly at this intersection however, the traffic report does not appear to identify any traffic signal and/or road capacity improvements to accommodate the additional traffic generated by this development.
 - b. The driveway into the multistorey car park is to be limited to left-in left-out only due to its proximity to the traffic signals and to maintain traffic flow on Edgbaston Road. This is to be achieved by installing a concrete median.
 - II. Proposed pedestrian crossing across King Georges Road / Edgbaston Rd intersection:
 - a. It is noted that a planning proposal was submitted for the lots adjacent to the Council car park. Has the option of a pedestrian bridge been explored and considered? It may be possible to incorporate this into the new development, reducing its impacts on King Georges Road.

- b. Traffic modelling is to be undertaken to assess the impacts of the proposed pedestrian crossing across King Georges Road at Edgbaston Rd. Adverse traffic impacts to King Georges Road is to be mitigated as it is a major public transport and road freight corridor.
- III. Proposed right turn movement from Edgbaston Road into King Georges Road:
 - a. The proposed right turn movement will result in additional phases at the TCS846 intersection. More green time will be taken away from King Georges Road which will increase queuing and delays on a major public transport and road freight corridor. Based on this, Network Operations does not support the proposed right turn movement based on the current traffic and road conditions.
- IV. Proposed additional bus services:
 - a. Proposed additional bus services on King Georges Road will increase traffic volumes on an already congested transport corridor. As outlined above, considering the proposed development uplift of the area (i.e. increasing residential and commercial densities), it is anticipated that this corridor and surrounding key intersections will have increased queues and delay given that it is already at capacity during peaks.
 - b. Traffic modelling is to be undertaken at key intersections to identify what traffic signal and/or road capacity upgrades are required.