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Dear Cathy,

PLANNING PROPOSAL REVIEW - 407-511 KING GEORGES ROAD BEVERLY HILLS

Thank you for the opportunity to review the Planning Proposal and supporting urban design study by Olsson Architecture for the sites on the western side of King Georges Road (407-511 King Georges Road Beverly Hills) within the Beverly Hills Town Centre Master Plan study area.

The comments below summarise the findings of our review of the Beverly Hills Town Centre Planning Proposal and Urban Design Study (by Olsson - V 1.1 - December 2022) prepared on behalf of the Beverly Hills Landowners Association. These have been considered in the context of the exhibited Beverly Hills Town Centre Master Plan, prepared by Gyde Consulting (formerly City Plan Strategy and Development).

We note that an Urban Design Study prepared by Olsson was presented to the Beverly Hills Master Planning Team on 4 October 2018, during the initial consultation phases of the Beverly Hills Town Centre master planning process. This was during the knowledge gathering stages of the project and prior to any master planning work being done. The current Olsson scheme is largely the same as was presented to the team in 2018 with an increase in height in some locations and has largely disregarded the outcome of the exhibited master plan. The Olsson scheme does not include robust urban design analysis that would otherwise be necessary to support the contextual justification for a substantial height increase as proposed.

According to the vision statement presented in the Olsson Urban Design Study, the proposal seeks to achieve an outcome that will “integrate seamlessly with Georges River Council's forthcoming master plan of the Beverly Hills Town Centre”. However, following Gyde's review of the proposal against the exhibited master plan documents, we wish to raise a number of urban design and built form issues for Council's consideration to assist in the assessment process and further discussions with the proponent.

Based on previous involvement in the master plan study, we understand that a complex suite of technical and planning constraints apply to the general area as well as individual sites. The focus of this peer review is the urban design and built form merits of the alternative massing strategy presented by Olsson for nominated Sub Precinct 5 (the King Georges Road strip) presented as part of the urban design justification supporting the Planning Proposal.

The issues and concerns we wish to raise include:

- The underlying urban typology assumptions;
- The alternative massing strategy and subsequent urban profile/skyline outcomes;
- Built form transition;

- Character responses;
- Streetwall proportions and setbacks;
- Streetwall breaks;
- Amenity outcomes; and
- Amenity impact.

For the reasons summarised in the comments below, we are unable to support the proposal in its current form including the extent of departure from the underlying design principles, which formed the basis of the exhibited master plan massing. Gyde considers that the distribution of bulk and scale sought by the study will lead to a series of undesirable urban design and streetscape outcomes.

It is acknowledged that increased densities are required to stimulate growth in Beverly Hills Town Centre. However, the intention of the Beverly Hills Town Centre master plan is to provide an urban design framework to enhance the centre and its immediate surroundings, improving the quality and amenity of the public domain. Achieving a human scale response to the pedestrian environment and sensitive scale responses to the precinct edges is instrumental to achieving the levels of revitalisation sought.

We are concerned that many of the urban design and built responses provided by the urban design study underpinning the proponent's Planning Proposal will not meet the aims and principles nominated in the exhibited master plan document as follows:

Urban typology assumptions

Many of the reference examples relied upon in the Case Study Analysis in the Olsson Urban Design Study (sections 2.1-2.4) lack consideration for the urban typology and town centre locality.

The precedent studies selected for the comparative study appears to focus on similarities in terms of the land zoning (B2, R4 and Commercial core) and connectivity rather than urban structure, centre status or zoning pattern (including relationship to surrounding low density areas).

Many examples are not considered relevant or desirable precedents for town centre/main street typologies (i.e. lack of street wall and pedestrian interface emphasis) consistent with the outcomes sought by the master plan document.

An updated comparative study of suitable built form and streetscape examples should focus on comparable town centres (in terms of centre hierarchy, residential context and zone interface condition, main street typology). The aims and priorities nominated in local strategic plans such as the Local Strategic Planning Statement should also inform a case study of relevant built form and streetscape typologies.

Massing Strategy and Urban Profile

Exhibited Master plan:

The massing strategy presented in the vision document envisages scale and built form emphasis bookending the northern and southern end of the commercial zone along King Georges Road, with a predominant 2 storey streetwall response along the primary retail areas frontage.

The envelope massing is expressed as a low scale streetwall element terminating in an increased scale at either end. The arrangement delivers a cohesive response along the western edge of the main street and a framework with sufficient capacity to integrate existing development which may, or may not, redevelop in the short to mid-term.

The proportions of the proposed massing (in the Olsson study) rely on an increased streetwall height, presenting proportions to the street that are in contrast to the existing development scale and grain. This reduces capacity to ensure long term flexibility for the western side of Kings George Road and to integrate existing fabric until future redevelopment occurs in line with the master plan vision.

The exhibited master plan anticipates a gradual increase in building heights upon arrival along Morgan Street

(east to west). Buildings heights are sought to gradually increase from 11m (approx. 3 storeys) to 28m (approx. 8 storeys plus incentivised heights) with maximum scale emphasis located near the northern entry to the precinct core. The corner emphasis announces the northern 'gateway' and the station.

Building heights up to 21m are proposed along the northern side of the railway, gradually reducing further north responding to the local topography. Along the western edge of King George Road, the exhibited master plan seeks to celebrate the main street entry points with continuous forms, whereas the upper streetwall component is recessive where the perimeter forms front the western side of the street. The outcome is enhanced by the stepped upper alignment, adding to the presence and containment provided by the corner forms.

Planning Proposal (Olsson) Urban Design Study:

The Planning Proposal seeks substantially increased maximum heights up to 50m at the north western entry to the mixed use precinct, delivering an abrupt increase in development scale contrary to the outcomes sought by the precinct master plan.

The Planning Proposal fails to include an alternative vision for the sites fronting the eastern side of King Georges Road or neighbouring residential areas, eroding the transitional urban profile/skyline envisaged for the northern precinct edge.

The Urban Design Study does not include comparative analysis or testing to justify the alternative urban form/skyline outcomes. Nor does it provide an alternative vision for the urban form outcomes along the eastern side of King Georges Road and their capacity to respond sympathetically to surrounding areas.

The Planning Proposal relies on an increased development scale, which is distributed more evenly along the western main street edge, increasing the proposed maximum heights from approximately 6 storeys to 12 storeys. The outcome is a visually dominant height spine fronting the western side of King Georges Road, detracting from the balanced streetscape scale (eastern vs western side), and eroding the 'bell curve' skyline profile sought by the exhibited master plan framework.

Built form transition

Exhibited master plan:

Based on the subdivision pattern, the geometry of the B2 zone interface varies between the eastern and western zone boundary. Unlike the eastern zone boundary, the western B2 zone boundary (of Precinct 5) is a linear alignment which, in combination with the local topography, amplifies the need for a well-considered and sensitive edge response to the residential interface to reduce visual bulk.

The master plan vision seeks to achieve strong built form containment and human scale proportions along the eastern block edge (King Georges Road interface) and the retail edge. The outcome is achieved through perimeter forms along the western side of King Georges Road.

Within the western portion of the blocks, the footprints are smaller with reduced scale to facilitate perceived transition in terms of scale and grain responding to the residential areas within the R3 Medium Density Residential zone to the west of the proponent's site.

Planning Proposal (Olsson) Urban Design Study:

Due to the scale and proportions presented to the eastern block edge, the Planning Proposal master plan scheme fails to achieve the desired human scale edge to complement the character and amenity outcomes for the pedestrian environment along King Georges Road.

While the scale presented to the western block edge is sympathetic to the development scale within the R3 zone, the continuous perimeter forms fail to respond to the grain of the residential area (frontage width, building length etc) and fails to incorporate adequate deep soil and landscape opportunities to complement the character along the western side of the lane. The PP package does not include analysis demonstrating how the continuous perimeter forms along the eastern laneway edge will impact on the spatial character and amenity of the laneway - noting the length of the continuous built form edge proposed.

We are concerned the response is too 'urban' in character and out of scale for a non-strategic centre, which is more pronounced given the desire to retain and respect the character of neighbouring R3 residential areas to the west, which are unlikely to change in scale and character in the short to mid-term. We also note that the eastern side of King Georges Road is unlikely to accommodate a scale equivalent to the scale proposed by the PP. This would result in two permanently incongruous streetwall edges to King Georges Road.

Character responses

Exhibited master plan:

The master plan vision seeks to ensure the revitalisation of Beverly Hills will continue to enhance and respond to the local character. High density residential to occur in a manner that retains and reinforces the garden character of existing residential streetscapes and reinforce the commercial spine of Beverly Hills.

Planning Proposal (Olsson) Urban Design Study:

As discussed in previous comments, the increased streetwall scale and grain responses provided to the western interfaces fails to respond sympathetically to surrounding existing development pattern and grain. The alternative massing erodes the landscape presence to the laneway which is an important character element in residential neighbourhoods.

The exhibited master plan massing established a rhythm of built forms separated by courtyards/open space nodes to facilitate built form relief and landscape/deep soil opportunities to the laneway interface. The Planning Proposal provides open space nodes as mid-block landscaping above structure whereby landscape amenity is 'privatised' to benefit future occupants rather than the public domain edge. The location of open space appears to be driven by requirements for building separation rather than by solar access and built form screening to public site edges. The strategy results in a development which is generally more urban in character along the western block edge than the exhibited scheme – despite the reduced scale.

The visual prominence of the continuous 12-14 storey tower forms would be visually exposed along its western interface, detracting from the residential neighbourhood character to the west of these proposed buildings. The poor outcome is likely to be amplified by the local topography.

No investigations of visual bulk exposure / view line analysis was provided as part of the Planning Proposal to support the significant increase in scale and to consider the visual impact of the building scale and form proposed.

Streetwall proportions and setbacks

Exhibited master plan:

The precinct master plan incorporates a 2 storey streetwall for the majority of the King Georges Road interface with 4-5 upper levels setback 4m from the primary streetwall alignment.

The 4m setback ensures the secondary streetwall reads as recessive with sufficient depth within the setback zone to accommodate a balcony and perimeter planters above the podium. The upper level setback was also intended to set dwellings back from King Georges Road as well as to accentuate the human scale its edge.

Planning Proposal (Olsson) Urban Design Study:

Contrary to the outcomes sought by the exhibited master plan, the proposal provides a 1m secondary setback above the 2nd storey with a further 3m setback above 8 storeys.

The proposed streetwall arrangement is a poor outcome. The limited setback above 2nd floor means the podium streetwall has lost the clarity intended in Council's master plan. The secondary streetwall has been moved closer to the street, detracting from the human scale street response sought by the town centre vision and placing the majority of dwellings closer to the road.

The Planning Proposal effectively increases the perceived streetwall scale from 2 to 8 storeys along the western street edge. The arrangement fails to address aims to recognise and enhance the existing character of the local area and erodes the balanced streetscape proportions sought by the master plan vision (eastern/western side of the street).

Streetwall breaks

Exhibited master plan:

The exhibited master plan vision includes three (3) major breaks in the secondary streetwall ranging from 12-27m in width. The breaks in the secondary streetwall establish a rhythm to deliver visual relief as to surrounding streets and nearby residential areas as 'solar/daylight corridors' to improve precinct amenity.

Planning Proposal (Olsson) Urban Design Study:

The proposal provides several breaks in the secondary streetwall but according to the typical mid-block streetscape elevations (P 17), some breaks are only 6m in width. Given the scale of the streetwall, the width of the breaks is considered inadequate to sufficiently mitigate visual prominence to the street.

For residential / shop top housing uses, 6m building separation would result in blank wall exposure to achieve non-habitable to non-habitable relationships to meet Apartment Design Guide (ADG) design guidance under 3F and 4H of the ADG.

Amenity and amenity impact

Based on the overshadowing analysis and typical block plans, it is unclear whether the west facing units will achieve sufficient direct sunlight during the afternoon to meet Design Criteria under Part 4A of the ADG. Any shadow cast by existing development along the western side of the laneway is not included in the shadow analysis.

Pedestrian precinct amenity will be adversely impacted by the increased streetwall scale and the proximity of tower forms (resulting from insufficient setback above the podium levels).

The master plan was predicated on the assumption that the residential area west of Dumbleton Lane is unlikely to redevelop in the short to mid-term due to the relatively recent development of the residential flat building in this area and the constraints of strata title in relation to land amalgamation. As such no change is proposed in this area and the scale of change that would be required to unlock these constraints was considered inappropriate for a local centre of this nature. Some existing residential buildings include living rooms and/or balconies that are orientated to the lane.

The Planning Proposal fails to demonstrate that reasonable levels of solar access and amenity is preserved to adjoining lots. The overshadowing diagrams supporting the scheme indicate the properties would be largely shaded until 12:00pm, so unless existing units have windows orientated north, they would be impacted by additional overshadowing.

To support the scale of development proposed, it would be reasonable for the proposal to more thoroughly considered and demonstrate that the intended built form outcomes achieve adequate solar access to living spaces and the principal usable space - Communal Open Space (COS) as required by the design criteria set out under Objective 3D-1 of the ADG.

Conclusion


We are unable to support the proposal in its current form given the extent of departure from the underlying design principles reflected in the exhibited master plan. The proposal appears to be driven by yield and massing, rather than to establish an urban form on sound and rational design principles. It lacks robust and considered urban design analysis to support or convincingly demonstrate reasoning underpinning the scale, form and massing intended.

Gyde considers that the distribution of bulk and scale sought by the study will lead to poor urban design and streetscape outcomes. Specifically, the PP will facilitate an urban form on the subject site that will:

- fail to integrate with the desired future scale of the precinct and what is considered to be a desired and appropriate scale for a centre of this nature.
- present a visually dominant height spine fronting the western side of King Georges Road, detracting from the balanced streetscape scale (eastern vs western side) and eroding the 'bell curve' skyline profile sought by the exhibited master plan framework.
- result in two permanently incongruous streetwall edges along King Georges Road given the excessive height which is unrealistic and out of character for a centre of this nature and where an equivalent scale is highly unlikely to be delivered on the eastern side of King Georges Road.
- detract from the residential neighbourhood character west of Dumbleton Lane through the visual prominence on a continuous 12-14 storey tower form which is likely to be amplified by the local topography.
- overwhelm the streetscape and detract from human scale at the street edge by increasing the perceived streetwall scale from 2 to 8 storeys along the western street edge and erode the balanced streetscape proportions on the eastern and western side of King Georges Road.
- result in a street wall that is excessive in scale that fails to integrate with the existing lower scaled buildings along the eastern side of the King Georges Road until such time that they are redeveloped.
- result in insufficient building breaks and the exposure of blank walls where breaks are proposed.

For the reasons above and in the absence of a robust urban design analysis, we believe the Proposal reflects a significant and inappropriate overreach in height and density for a local centre of this nature, particularly in relation to the broader centres hierarchy.

Yours sincerely,



Helen Deegan
Executive Director



Sonny Embleton
Associate Director