Douglas Partners
Geotechnics / Environment / Groundwater

Integrated Practical Solutions

Report on
Preliminary Site Investigation (Contamination)

Proposed Redevelopment
407-511 King Georges Road, Beverly Hills

Prepared for
Beverly Hills Owners Association Inc Pty Ltd

Project 211987.00
May 2022

Douglas Partners
Geotechnics / Environment / Groundwater

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The undersigned, on behalf of Douglas Partners Pty Ltd, confirm that this document and all attached drawings, logs and test results have been checked and reviewed for errors, omissions and inaccuracies.

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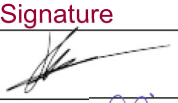
Author		27 May 2022
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Report on Preliminary Site Investigation (Contamination)
Proposed Redevelopment
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1. Introduction

Douglas Partners Pty Ltd (DP) has been engaged by Mecone Pty Ltd on behalf of Beverly Hills Owners Association Inc Pty Ltd to complete this Preliminary Site Investigation (Contamination) (PSI) undertaken for a proposed redevelopment for the site at 407-511 King Georges Road, Beverly Hills (the site). The site is shown on Drawing 1, Appendix A.

The investigation was undertaken in accordance with DP's proposal P211987.00 dated 22 December 2021. It should be noted, the scope of this assessment is limited on request by the client Mecone Pty Ltd on behalf of Beverly Hills Owners Association Inc Pty Ltd.

It is understood the site forms part of the larger proposed 11.5 ha redevelopment of Beverly Hills Town Centre and that the development is currently within the conceptual stage.

Based on the preliminary conceptual designs prepared by Olsson & Associates Architects Pty Ltd (see attached plans in Appendix C) it is understood that the proposed redevelopment within the site will likely comprise demolition of existing buildings and associated infrastructures (i.e., along 407 to 511, King Georges Road West, Beverly Hills), and redevelopment of 12 blocks of 12 storey mixed commercial/residential buildings with retail space on ground level, three levels of basement and inner landscaped courtyard.

The objectives of the PSI are to assess the potential for contamination at the site based on past and present land uses and to comment on the need for further investigation and / or remediation / management with regard to the proposed development. It is understood that the report will be used to support a planning proposal for the proposed development.

This report must be read in conjunction with all appendices including the notes provided in Appendix B.

The following key guidelines were consulted in the preparation of this report:

- NEPC *National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013) [NEPM]* (NEPC, 2013); and
- NSW EPA *Guidelines for Consultants Reporting on Contaminated Land* (NSW EPA, 2020).

2. Scope of Works

The scope of works comprised:

- Review of published geological, soil landscape and acid sulfate soil maps;
- Search of the NSW Department of Primary Industries groundwater database for registered groundwater bores near to the site;
- Review of readily available historical aerial photographs, to identify previous land uses which may indicate potential contamination sources;
- Search of the NSW EPA Register for notices issued under the Contaminated Land Management Act 1997 and the Protection of the Environment Operations Act 1997;
- A search of accessible Council records using their website (whilst identified as part of the scope, the records were not made available at the time of preparing for this report);
- A site walkover to observe current and recent land uses and assess the potential for contaminating activities. This comprises observation of the site from publicly accessible areas as the site access was restricted at the time of the site walkover; and
- Preparation of this report.

3. Site Information

The site is located approximately 15 km south-west from the Sydney CBD and comprises the main commercial core along King Georges Road between Beverly Hills Station and Stony Creek Road. The site is bordered by T8 South rail line to the north, King Georges Road to the east, Stony Creek Road to the south and Dumbleton Lane to the west. Rudduck Lane and runs through the centre of the site from Dumbleton intersecting King Georges Road from the south-east and Edgbaston Road cuts through the northern portion of the site, intersecting King Georges Road from the south-east.

The Site currently comprises 56 Lots covering an approximate area of 1.85 ha and is occupied by a variety of commercial institutions, including restaurants, services (such as printing, hardware repair and car rental), dentistry, entertainment / leisure (Beverly Hills Hotel and film house), retail (such as groceries, convenience stores and vendors for alcoholic beverages) and several vacant lots, rear open space carparking and loading bays.

Site Address	407-511 King Georges Road, Beverly Hills
Legal Description	Currently comprise of 56 Lots along west site of 407 to 511 King Georges Road, Beverly Hills (refer to table 1).
Area	Approximately 18500 m^2
Zoning	Zone B2 Local Centre
Local Council Area	Georges River Council
Current Use	Mixed commercial residential

Surrounding Uses	North - King Georges Road runs north-west to south-east, generally low density commercial and residential land use, with Beverly Hills Station and T8 rail line running east to west intercepting the northern boundary of the site. East - Adjoined by King Georges Road, followed by commercial and low-density residential land use. South - Adjoined by Stony Creek Road running east to west, followed by commercial and low-density residential land use. West - Adjoined by Dumbleton lane followed by low density residential land use.

Figure 1: Site Location

Table 1: List of Lots and Deposited Plans (from north to south)

Lot	Deposited Plan
1	DP533022
F	DP21064
E	DP21064
D	DP21064
C	DP21064
B	DP21064
1	DP455272
54	DP457005
53	DP3315
52	DP3315
51	DP3315
50	DP3315
49	DP3315
48	DP3315
47	DP3315
46	DP3315
45	DP3315
44	DP3315
43	DP3315
42	DP3315
2	DP5066
1	DP506683
100	DP1128811
33	DP3315
32	DP3315
31	DP3315
30	DP3315
29	DP3315
28	DP3315
27	DP3315
26	DP3315
25	DP3315
24	DP3315
23	DP3315
22	DP3315
21	DP3315
20	DP3315
19	DP3315
18	DP3315

Lot	Deposited Plan
17	DP3315
16	DP3315
15	DP3315
14	DP3315
13	DP3315
1	DP218498
2	DP218498
3	DP218498
4	DP218498
5	DP218498
7	DP3315
6B	DP413093
5A	DP413093
4	DP3315
3	DP3315
2	DP1078928
1	DP1078928

4. Environmental Setting

Regional Topography	Regional topography largely follows the natural landscape, characterised by level to gently undulating hills and flood plains ranging from approximately RL 24 m AHD to RL 40 m AHD with a medium elevation of approximately RL 30 m AHD.
Site Topography	Site topography appears to be relatively level and curvilinear, characteristic of earthworks associated with development of transport infrastructure. Published lidar mapping[1] indicates the site displays an elevation profile ranging from RL 32.0 m AHD near the north-western boundary, gently dipping to RL 29 AHD towards the centre of the site and gradually inclining towards the south-eastern boundary reaching a maximum of RL 37 m AHD.

[1] Elvis – Elevation and Depth – Foundation Spatial Data (2019)

Soil Landscape	Published soil landscape mapping[2] indicates the site is situated on the boundary of two mapped soil landscapes, namely, the Birrong and Blacktown soil landscapes, characterised by shallow to deep yellow alluvial clays and silty clays on flood plains underlain by shallow to moderately deep red and brown residual clays and silty clays atop Wianamatta Group shales. Limitations include highly erosional soil landscapes, moderately reactive subsoils and seasonal waterlogging.
Geology	Published geological mapping[3] Indicate the site is underlain by Mid-Triassic Wianamatta Group Ashfield Shale, which typically characterised by black to dark grey shale and laminite (finely interbedded sandstones and siltstones).
Acid Sulfate Soils	Reference to the 1:25 000 Acid Sulphate Soils (ASS) Risk map indicates that the site is within an area of no known occurrence of acid sulphate soils.
Surface Water	Surface water from the site (originating from stormwater) is expected to drain offsite through a series of stormwater drains and canals towards the west. The nearest downgradient waterbody is Salt Pan creek, situated approximately 3.3 km west from the site and runs south into the Georges River and Botany Bay.
Groundwater	A search of registered groundwater bores within a 1.5 km radius of the site yielded two existing wells, however no standing water level is available in the records. DP's previous experience within proximity to the site suggests groundwater standing water level is at approximately RL 32 m AHD, and groundwater flows in a southerly direction, given the site topography, and limited groundwater data available, groundwater is inferred to flow in a southerly direction, into Georges River, the likely receiving body for groundwater. Given the local geology (i.e.: Ashfield Shale), the groundwater in the fractured rock beneath the site is anticipated to be saline and very low yield. Accordingly, there would be no significant potential beneficial uses of the groundwater.

[2] Soil Landscapes of the Sydney 1:100,000 Sheet map, Ed. 4, Department of Environment, Climate Change and Water, Sydney (2009)
[3] coastal quaternary geology 1:100 000 and 1:25 000 / Geological Survey of New South Wales; NSW Department of Industry, Resources and Energy (2015)

5. Site History

5.1 Historical Aerial Photography

Several historical aerial photographs were obtained from public databases. Copies of historical and current aerial photographs are attached in Appendix D. A summary of key features observed for the site and surrounding land is presented in Table 2.

Table 2: Summary of Historical Aerial Photographs

Year	Site	Surrounding Land Use
1930	The site appeared rural, undeveloped, and grassed, three structures are observed on the site, likely to be of residential use. Edgbaston Road intersects the northern portion of the site although, observed to be a dirt track at this time.	The surrounding area appeared to be rural residential, King Georges Road runs north-west to south-east along the eastern boundary of the site and Stoney Creek Road adjoins the southern site boundary, both of which appeared to be unpaved. A rail line adjoins the northern boundary of the site and appeared to be under works at this time.
1943	The structure north of Edgbaston Road appeared to be demolished, structures in the central (473-477 King Georges Road) and Southern portion of the site appeared to be constructed sometime between 1930 and 1943. A drainage canal has been excavated running through the central section of the site. Edgbaston Road has undergone significant upgrade and appears to be definable by this point.	A number of residential developments appeared to have occurred in the surrounding area sometime between 1930 and 1943. The surrounding road infrastructure is observed to have undergone upgrade and expansion, namely King Georges Road and Stoney Creek Road appears to be paved. The rail line to the north appeared to be developed further (addition of an over-bridge crossing the rail corridor).
1949	The Site appeared to have undergone further development, with several low-rise structures (presumably of commercial usage) being constructed in the central and southern portion of the site. the northern portion remains largely unchanged.	Further residential developments appeared to have been undertaken since the 1943 aerial photograph. No notable changes to the rail line in the north.
1951	The site appeared largely unchanged, with some minor developments observed in the southern portion.	Minor infrastructure and residential developments continued in the surrounding area, most notably, King Georges Road appeared to have undergone minor upgrades.

Year	Site	Surrounding Land Use
1955	The site continues to be developed, with several structures observed in the northern portion of the site, with the northern most building partially complete, developments on-site are likely of mixed residential/commercial use.	Continued residential developments in the surrounding area. Several developments are observed to be underway along the eastern side of King Georges Road.
1961	Continued developments on-site, the norther structure appeared complete. Edgbaston Street appeared to have undergone minor upgrades and expansion.	Continued residential developments in the surrounding area, it is noted that majority of the residential lots to the south of the rail line have been developed at this time. The structures (likely commercial) to the east of King Georges Road appeared to be complete. The surrounding road infrastructure appeared to have undergone minor upgrades.
1965	The site largely appeared to be in its present condition.	Minor residential developments within the surrounding area.
1970	The site remains largely unchanged, a car park appeared to be added, in part, to the northern portion of the site.	The surrounding area appeared largely unchanged, with minor developments continuing in the area.
1978	An additional structure now occupies the northern-most lot, bordering the northern boundary, likely commercial/warehouse.	The surrounding area appeared largely unchanged. The carpark to the north-west of the site, across the rail line appeared to be cleared.
1982	The site appeared to remain largely unchanged with the exception of minor alterations.	The surrounding area appeared largely unchanged. Several structures appeared to the northwest of the site, across the rail line.
1991	The site appeared to remain largely unchanged with the exception of minor alterations.	The surrounding area appeared largely unchanged.
1994	The site appeared to remain largely unchanged with the exception of minor alterations.	The surrounding area appeared largely unchanged. The development to the north-west of the site, across the rail line (possibly educational centre) appeared complete.
2005	The site appeared to remain largely unchanged.	The surrounding area appeared largely unchanged.

Year	Site	Surrounding Land Use
2016	The structure to the south of the stormwater canal (445 King Georges Road) appeared to be demolished.	The surrounding area appeared largely unchanged.
2022	The structures (473-477 King Georges Road) appeared to be in the process of demolition.	The surrounding area appeared largely unchanged.

5.2 Public Registers and Planning Records

EPA Notices available under Section 58 of the Contaminated Lands Management Act (CLM Act) Database searched 09 May 2022	There were no records of notices for the site and adjacent sites within a 2 km radius.
Sites notified to EPA under Section 60 of the CLM Act Database searched 09 May 2022	There were no records of notices for the site and adjacent sites within a 2 km radius.
Licences listed under Section 308 of the Protection of the Environment Operations Act 1997 (POEO Act) Database searched 09 May 2022	The results of a search of the public database indicated that the site does not hold any licences under section 308 of the POEO Act. The Search also indicated there are 92 licences issued to adjacent sites, all of which are associated with CPB CONTRACTORS Pty Ltd for transport infrastructure activities along King Georges Road.
Council Records	An initial search of Council records indicated the following: • The site comprised of 27 retail/commercial properties each with various businesses that are either current or have operated there in the past. They are mostly restaurants and food shops. In this regard, there are hundreds of Development/Building/Complying Development Applications. Based on the initial search, no documents relating to the purpose of this contamination assessment was located.

- One file pertaining to the scope of this assessment was located, namely, for the property at No. 507-517 King Georges Road, which was used as a petrol station from the 1950s until its closure in 1987. A restaurant was then built on the site by Development Application 87/DA-126. The Council records are attached in Appendix D.

5.3 Site History Integrity Assessment

The information used to establish the history of the site was sourced from reputable and reliable reference documents, many of which were official records held by Government departments / agencies. The databases maintained by various Government agencies potentially can contain high quality information, but some of these do not contain any data at all.

In particular, aerial photographs can provide high quality information that is generally independent of memory or documentation. They are only available at intervals of several years, so some gaps exist in the information from this source. The observed site features are open to different interpretations and can be affected by the time of day and / or year at which they were taken, as well as specific events, such as flooding. Care has been taken to consider different possible interpretations of aerial photographs and to consider them in conjunction with other lines of evidence.

5.4 Summary of Site History

The limited site history information suggests that the site was largely vacant prior to 1930, at the point which three lots were occupied by low rise structures possibly of residential use. The site and surrounding area underwent significant but steady development between 1930 and 1955, the majority of developments in the surrounding area comprised of residential and infrastructure (road and rail line) developments, whilst developments onsite appeared to be largely of mixed (commercial/residential) use.

The site is observed from aerial photography to be at large in its present condition around 1955. The following decades (1955 to 2005) indicate a reduction in new developments, with the exception of the east side of King Georges Road (presumably mixed commercial / residential use), and north-western side of the rail line (presumably public infrastructure), which underwent notable development. Between 2005 and 2022, a number of structures underwent demolition (presumably 445 & 473-477 King Georges Road).

Council records indicate the property at No. 507-517 King Georges Road operated as a petrol station since 1950s to closure in 1987, following which it underwent redevelopment into a restaurant.

A search of EPA Database for notices under section 58 & 60 of CLM act and Section 308 of the POEO act indicated the EPA is unaware of any contamination on or within a 2 km radius of the site.

6. Site Walkover

6.1 Observations

A site walkover was undertaken by an environmental engineer on 5 May 2022. It should be noted the site walkover observed the externally visibly sections of the site only, as such, the internal operations of the site were not observed and any comments on the internal uses on the site is inferred. The following descriptions are based on the site walkover.

The general site topography was consistent the description in Section 4. The site was observed to comprise largely of commercial (retail, restaurant, and entertainment) storefronts along King Georges Road and Edgbaston Road, which intercepts the site in the northern section and adjoins perpendicularly with King Georges Road. Several stores along King Georges Road were observed to be closed and/or non-operational during the site walkover (mostly restaurants).

Access to the rear (south-western boundary) of the site is gained through 4 Edgbaston Road Parking to the north of Edgbaston Road and through Dumbleton Lane to the south of Edgbaston Road, a shared (vehicle and pedestrian) accessway (Rudduck Lane) intersects the southern third of the site however, vehicular access is available from Dumbleton Lane only, Stony Creek Road intersects King Georges Road at the southern boundary of the site.

The following key site features pertinent to the PSI were observed (refer to photographs in Appendix E and Drawing 2 & 3 in Appendix A).

- The majority of the site is asphalt paved (the pavements appeared to be moderately maintained) and / or occupied by structures, as such current access to subsoils beneath the site is considered limited (refer to photographs 5, 6, 8, 10, 27 and 28);
- A car rental agency is located at the northern portion of the site on 407-409 King Georges Road (see photograph 10);
- Electrical Transformer on Rudduck Lane (see photograph 16);
- Stormwater drainage from the central portion of the site appeared to follow roadside gutters and drains into the stormwater canal on 443-445 King Georges Road (see Photographs 3 & 18-20);
- Stormwater from the southern northern and southern portions of the site appeared to follow roadside gutters and drains along Edgbaston Road and Stoney Creek Road and flows towards the south-west (see photographs 13, 24 & 25);
- A Dry Cleaner was identified at shop 7-8/423 King Georges Road, the observable instore operation consisted of a number of closed loop dry cleaning machines and a number of chemical containers (inferred to contain dry cleaning and spotting agents, as such, dry cleaning operations are being undertaken in store (refer to photograph 11 & 12);
- 443-445 King Georges Road is vacant and surface building rubble was observed, presumably from the demolition of previous structures on the lot, the rubble consists of building materials (including brick, tile, glass, concrete, Besser block, plastic and ceramic fragments) with potential to contain asbestos (see photographs 2-5) although none was observed;
- The structure along 473-477 King Georges Road is observed to be under demolition (see photographs 29 & 30); and

- A number of waste storage containers were observed in the rear of 427 and 453 King Georges Road, these appear to be comprise common chemicals used in restaurants (such as lecithins - a dietary supplement, CO_2 and butane) none of the observed waste containers contain chemicals which are under environmental regulation.

It should be noted, in general, storage of cleaning chemicals, liquefied petroleum gas (LPG) cylinders, nitrogen or carbon dioxide cylinders, above / underground grease traps and associated oil and water separators are commonly identified in rear of restaurants and bars, although none were observed.

7. Preliminary Conceptual Site Model

A Conceptual Site Model (CSM) is a representation of site-related information regarding contamination sources, receptors and exposure pathways between those sources and receptors. The CSM provides the framework for identifying how the site became contaminated and how potential receptors may be exposed to contamination either in the present or the future i.e., it enables an assessment of the potential source - pathway - receptor linkages (complete pathways).

Potential Sources

Based on the current investigation, the following potential sources of contamination and associated contaminants of potential concern (COPC) have been identified.

- S1: Ongoing commercial operations (I.e., dry cleaning, restaurant grease traps, waste, and storage of chemicals on site).
  - COPC include, TRH, BTEX, PAH, and volatile organic compounds (VOC) including chlorinated solvents.
- S2: Fill: Associated with levelling, demolition of former buildings on the site, trenching of services and potential burying of waste.
  - COPC include metals, total recoverable hydrocarbons (TRH), benzene, toluene, ethylbenzene, xylene (BTEX), polycyclic aromatic hydrocarbons (PAH), polychlorinated biphenyls (PCB), organochlorine pesticides (OCP), phenols and asbestos.
- S3: Historical (known and unidentified) commercial land use onsite and nearby, council records indicate one former petrol station onsite.
  - COPC include COPC include metals, total recoverable hydrocarbons (TRH), benzene, toluene, ethylbenzene, xylene (BTEX), polycyclic aromatic hydrocarbons (PAH), polychlorinated biphenyls (PCB), organochlorine pesticides (OCP), phenols, PFAS and asbestos.
- S4: Former buildings.
  - COPC include asbestos, synthetic mineral fibres (SMF), lead and PCB.
- S5: Pesticide application beneath buildings, pavement and in service pits.
  - CoPC include OCP and OPP.

Potential Receptors

The following potential human receptors have been identified:

- R1: Current users [mixed];
- R2: Construction and maintenance workers;
- R3: End users [mixed]; and
- R4: Adjacent site users [mixed and residential].

The following potential environmental receptors have been identified:

- R5: Surface water - Salt Pan Creek (brackish estuarial ecosystem);
- R6: Groundwater; and
- R7: Terrestrial ecosystems.

Potential Pathways

The following potential pathways in relation to human receptors have been identified:

- P1: Ingestion and dermal contact;
- P2: Inhalation of dust and / or vapours; and
- P3 – Abstraction and use (e.g., for drinking or irrigation) of contaminated groundwater.

The following potential pathways in relation to the environmental receptors have been identified:

- P4: Surface water run-off;
- P5: Leaching of contaminants from soil / fill and vertical migration to groundwater; and
- P6: Lateral migration of contaminants in groundwater which provides base flow to water bodies.

Summary of Potentially Complete Exposure Pathways

A ‘source–pathway–receptor’ approach has been used to assess the potential risks of harm being caused to human or environmental receptors from contamination sources on or in the vicinity of the site, via exposure pathways (potential complete pathways). The possible pathways between the above sources (S1 to S5) and receptors (R1 to R7) are provided in below Table .

Table 3: Summary of Potentially Complete Exposure Pathways

Source	Transport Pathway	Receptor	Risk Management Action Recommended
S1: Ongoing commercial operations S2: Fill sourced from cut / fill and/or unknown off-site sources S3: Historical commercial land use S4: Former buildings S5: Pesticide application beneath buildings	P1 – Ingestion and dermal contact P2 – Inhalation of dust and/or vapours P3* – Abstraction and use (e.g., for drinking or irrigation) of contaminated groundwater P5 – Leaching of contaminants from soil / fill and vertical migration to groundwater	R1: Current site users R2: Construction and maintenance workers R3: End users [mixed] R4: Adjacent land uses [mixed and residential]	Conduct intrusive sampling to characterise soil and groundwater on site, testing the key CoPC so as to provide a preliminary evaluation of any potential exposure pathways.
S1: Past and present dry-cleaning operations S3: Adjacent commercial sites	P4: Surface water runoff P5: Leaching of contaminants from soil / fill and vertical migration to groundwater P6: Lateral migration of contaminants in groundwater which provides base flow to water bodies	R5: Surface water - Salt Pan Creek (brackish estuarial ecosystem) R6: Groundwater R7: Terrestrial ecosystems	

Notes to Table 2:
*Given that abstraction and use (e.g., for drinking or irrigation) of groundwater beneath the site is highly unlikely to occur now or in the future, as well as there being no registered groundwater bores within a 1km radius of the site this potential exposure pathway will not be considered further.

8. Conclusions and Recommendations

The site history information reviewed indicates the site and surrounding area was likely rural residential prior to 1930, with significant commercial and residential (likely predominantly commercial) developments occurring on site between 1930 to 1955. Hence the site is inferred to have operated largely under commercial land uses since 1955 (possibly earlier). However, given that only a limited historical study was conducted no information was examined on the commercial history of the site and accordingly, a significant data gap exists in relation to potential contaminating historical land uses for the site. Therefore, a supplementary detailed historical search is warranted, the provide additional data on the historical commercial operations may assist in designing a more tailored intrusive investigation.

Given the age of the buildings and structures on site they are likely to contain hazardous building materials (HBMs). A HBM survey of site buildings is therefore recommended during the pre-development planning phase, followed by certified removal/management of HBMs prior to demolition.

It is noted that present operations on site include a dry-cleaner and possibly several grease traps associated with the restaurants. Hence, there exist potential for surface and groundwater contamination and migration of potential contaminants to human and ecological receptors off site.

Accordingly, based on the results of this limited PSI, the following investigations are recommended:

- **Detailed Site History Search -** A supplementary desktop study to address the data gap in historical land use and provide additional information for a tailored intrusive investigation, the search should include: detailed review of Council records, *inter alia* schedule 11 hazardous chemicals, historical title deeds, Section 10.7 certificates and registered businesses onsite and in the surrounding area.
- **Intrusive Investigation -** A detailed site investigation (DSI) with intrusive soil and groundwater sampling should be carried out following vacancy of site buildings to assess the potential for soil, soil vapour and groundwater contamination and to determine the need for site remediation, or otherwise. The DSI should also incorporate a provisional waste classification of fill / soil to be removed as part of the proposed basement excavation.
- **Hazardous Building Material Survey -** A HBM Survey and associated removal / management of HBMs should be undertaken prior to demolition of site buildings and structures, and a clearance report issued by a qualified occupational hygienist following demolition.
- **Post Demolition Validation -** Given that a signification proportion of the site is currently occupied by site buildings and structures, a post demolition validation assessment or similar should be carried out to assess the status of soil contamination within the building footprints.

9. Reference

NEPC. (2013). *National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended 2013) [NEPM].* Australian Government Publishing Services Canberra: National Environment Protection Council.

NSW EPA. (2020). *Guidelines for Consultants Reporting on Contaminated Land.* Contaminated Land Guidelines: NSW Environment Protection Authority.

10. Limitations

Douglas Partners (DP) has prepared this report for this project at 407-511 King Georges Road, Beverly Hills in accordance with DP's proposal 211987.00.P.001.Rev0 dated 22 December 2021 and acceptance received from Elysse Kuhar of Mecone Pty Ltd on behalf of Beverly Hills Owners Associated Inc Pty Ltd. The work was carried out under DP's Conditions of Engagement. This report is provided for the exclusive use of Beverly Hills Owners Association Inc Pty Ltd for this project only and for the purposes as described in the report. It should not be used by or relied upon for other projects or purposes on the same or other site or by a third party. Any party so relying upon this report beyond its exclusive use and purpose as stated above, and without the express written consent of DP, does so entirely at its own risk and without recourse to DP for any loss or damage. In preparing this report DP has necessarily relied upon information provided by the client and/or their agents.

DP's advice is based upon the conditions encountered during this investigation. The advice may also be limited by budget constraints imposed by others or by site accessibility.

This report must be read in conjunction with all of the attached and should be kept in its entirety without separation of individual pages or sections. DP cannot be held responsible for interpretations or conclusions made by others unless they are supported by an expressed statement, interpretation, outcome or conclusion stated in this report.

This report, or sections from this report, should not be used as part of a specification for a project, without review and agreement by DP. This is because this report has been written as advice and opinion rather than instructions for construction.

The scope for work for this report did not include the assessment of surface or sub-surface materials or groundwater for contaminants, within or adjacent to the site. Should evidence of fill of unknown origin be noted in the report, and in particular the presence of building demolition materials, it should be recognised that there may be some risk that such fill may contain contaminants and hazardous building materials

The contents of this report do not constitute formal design components such as are required, by the Health and Safety Legislation and Regulations, to be included in a Safety Report specifying the hazards likely to be encountered during construction and the controls required to mitigate risk. This design process requires risk assessment to be undertaken, with such assessment being dependent upon factors relating to likelihood of occurrence and consequences of damage to property and to life. This, in turn, requires project data and analysis presently beyond the knowledge and project role respectively of DP. DP may be able, however, to assist the client in carrying out a risk assessment of potential hazards contained in the Comments section of this report, as an extension to the current scope of works, if so requested, and provided that suitable additional information is made available to DP. Any such risk assessment would, however, be necessarily restricted to the environmental components set out in this report and to their application by the project designers to project design, construction, maintenance and demolition.

Appendix A

Drawings


King Georges Road
Dumbleton Lane
Edgbaston Road


King Georges Road
Edgbaston Road
Dumbleton
1
2
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7
8
9
10
11
12
13
14
15


King Georges Road
Dumbleton Lane
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Appendix B

About this Report

About this Report

Douglas Partners

Introduction

These notes have been provided to amplify DP's report in regard to classification methods, field procedures and the comments section. Not all are necessarily relevant to all reports.

DP's reports are based on information gained from limited subsurface excavations and sampling, supplemented by knowledge of local geology and experience. For this reason, they must be regarded as interpretive rather than factual documents, limited to some extent by the scope of information on which they rely.

Copyright

Borehole and Test Pit Logs

The borehole and test pit logs presented in this report are an engineering and/or geological interpretation of the subsurface conditions, and their reliability will depend to some extent on frequency of sampling and the method of drilling or excavation. Ideally, continuous undisturbed sampling or core drilling will provide the most reliable assessment, but this is not always practicable or possible to justify on economic grounds. In any case the boreholes and test pits represent only a very small sample of the total subsurface profile.

Interpretation of the information and its application to design and construction should therefore take into account the spacing of boreholes or pits, the frequency of sampling, and the possibility of other than 'straight line' variations between the test locations.

Groundwater

Where groundwater levels are measured in boreholes there are several potential problems, namely:

- In low permeability soils groundwater may enter the hole very slowly or perhaps not at all during the time the hole is left open;
- A localised, perched water table may lead to an erroneous indication of the true water table;
- Water table levels will vary from time to time with seasons or recent weather changes. They may not be the same at the time of construction as are indicated in the report; and
- The use of water or mud as a drilling fluid will mask any groundwater inflow. Water has to be blown out of the hole and drilling mud must first be washed out of the hole if water measurements are to be made.

More reliable measurements can be made by installing standpipes which are read at intervals over several days, or perhaps weeks for low permeability soils. Piezometers, sealed in a particular stratum, may be advisable in low permeability soils or where there may be interference from a perched water table.

Reports

The report has been prepared by qualified personnel, is based on the information obtained from field and laboratory testing, and has been undertaken to current engineering standards of interpretation and analysis. Where the report has been prepared for a specific design proposal, the information and interpretation may not be relevant if the design proposal is changed. If this happens, DP will be pleased to review the report and the sufficiency of the investigation work.

Every care is taken with the report as it relates to interpretation of subsurface conditions, discussion of geotechnical and environmental aspects, and recommendations or suggestions for design and construction. However, DP cannot always anticipate or assume responsibility for:

- Unexpected variations in ground conditions. The potential for this will depend partly on borehole or pit spacing and sampling frequency;
- Changes in policy or interpretations of policy by statutory authorities; or
- The actions of contractors responding to commercial pressures.

If these occur, DP will be pleased to assist with investigations or advice to resolve the matter.

About this Report

Site Anomalies

In the event that conditions encountered on site during construction appear to vary from those which were expected from the information contained in the report, DP requests that it be immediately notified. Most problems are much more readily resolved when conditions are exposed rather than at some later stage, well after the event.

Information for Contractual Purposes

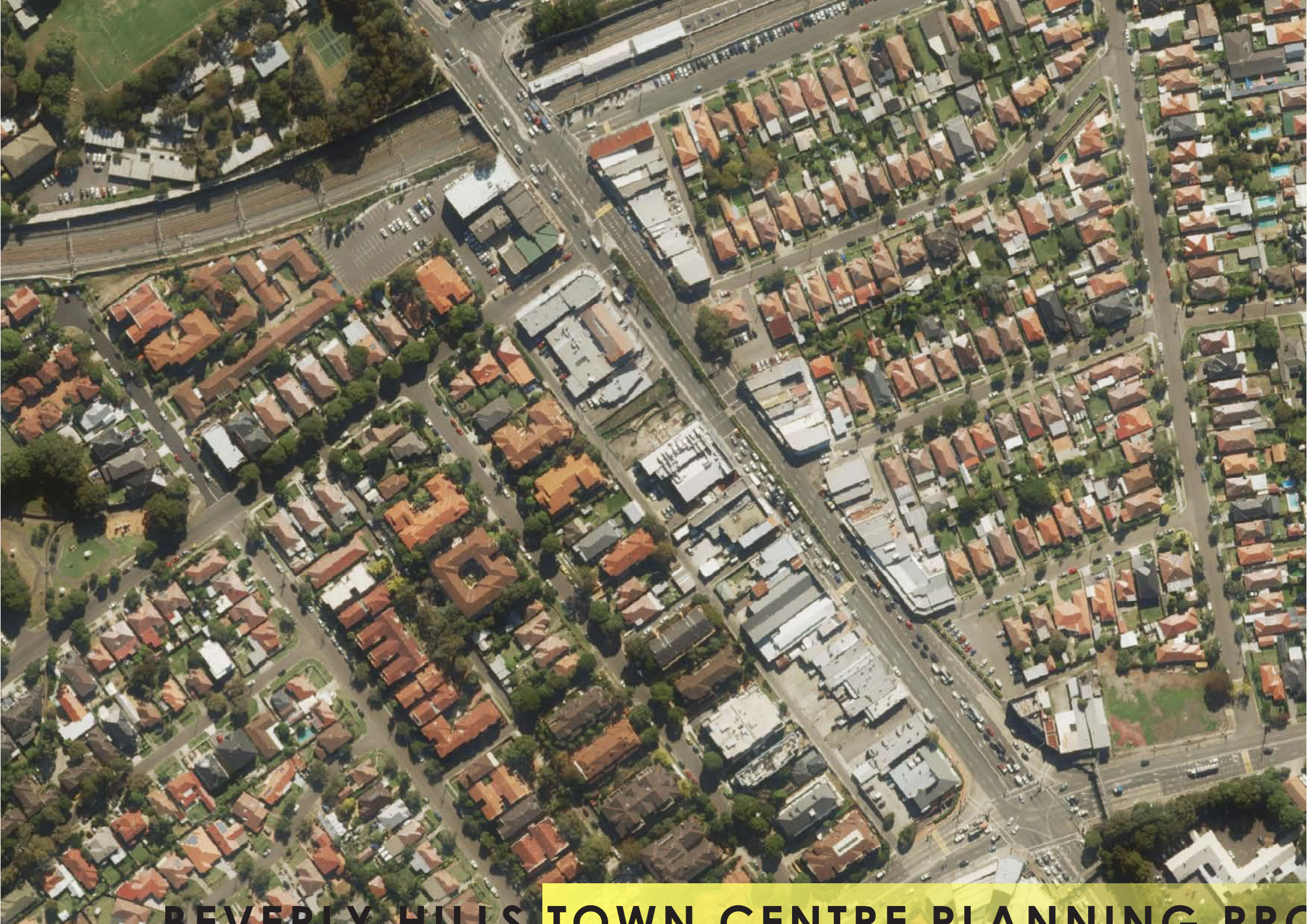
Where information obtained from this report is provided for tendering purposes, it is recommended that all information, including the written report and discussion, be made available. In circumstances where the discussion or comments section is not relevant to the contractual situation, it may be appropriate to prepare a specially edited document. DP would be pleased to assist in this regard and/or to make additional report copies available for contract purposes at a nominal charge.

Site Inspection

The company will always be pleased to provide engineering inspection services for geotechnical and environmental aspects of work to which this report is related. This could range from a site visit to confirm that conditions exposed are as expected, to full time engineering presence on site.

Appendix C

Architectural Plan


BEVERLY HILLS TOWN CENTRE PLANNING PRO

Title	Stag
Project	Beve
Description	Urba
Key Contact	Russ

Prepared By	Olss
Address	Leve
Email	Russ
Website	olss

Author	Pedr
Checked	Russ
Authorised	RO

Executive Summary

Olsson Associates Architects thanks you for inviting us to prepare this D
based on our planning, urban design and architectural design experienc
the first stage of a Planning Proposal, and we look forward to having the
Georges River Council planners to achieve an excellent outcome for the P

We understand that the Association aims to :

- Raise the prominence of the Beverly Hills Town Centre within the
- Promote transit oriented development
- Capitalise upon the position of Beverly Hills being on the rail line
- Promote the continuation of nightlife uses, with on-site parking fo
- Maximizing densities whilst following urban design principles, me

excellence.

**Our vision is to transform Beverly Hills into a vibrant mixed us
contemporary boulevard built form, with residential apartme
design excellence**

We achieve this vision at the 3 scales of regional planning, urban design a

Regional planning
We demonstrate that there is good reason for Beverly Hills to be re-de
corridors of the "South District Plan". The centres location on the rail line
are two reasons supporting its redevelopment.

Urban design
The existing layout of King Georges Road over the topography, the landsc
some local identity to the centre. We propose enhancing the centre's s
appropriate to the wide road reserve, creating a contemporary urban
development to relate to the existing 2 storey shops while re-developme
visual symmetry on both sides of the boulevard.

Architectural design
We have demonstrated how every site is able to achieve its allocated F
Please see the site studies in this report.

Table of Contents

Site Overview

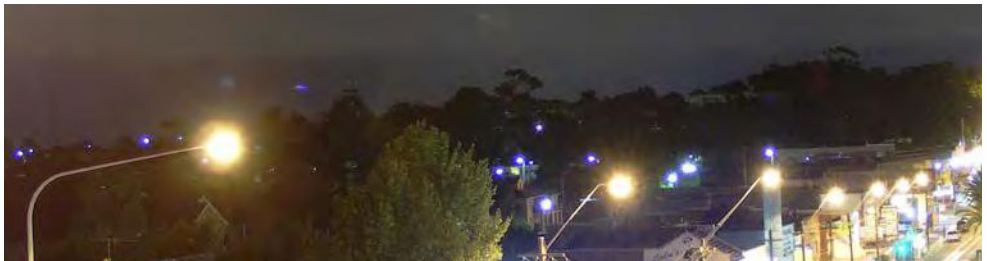
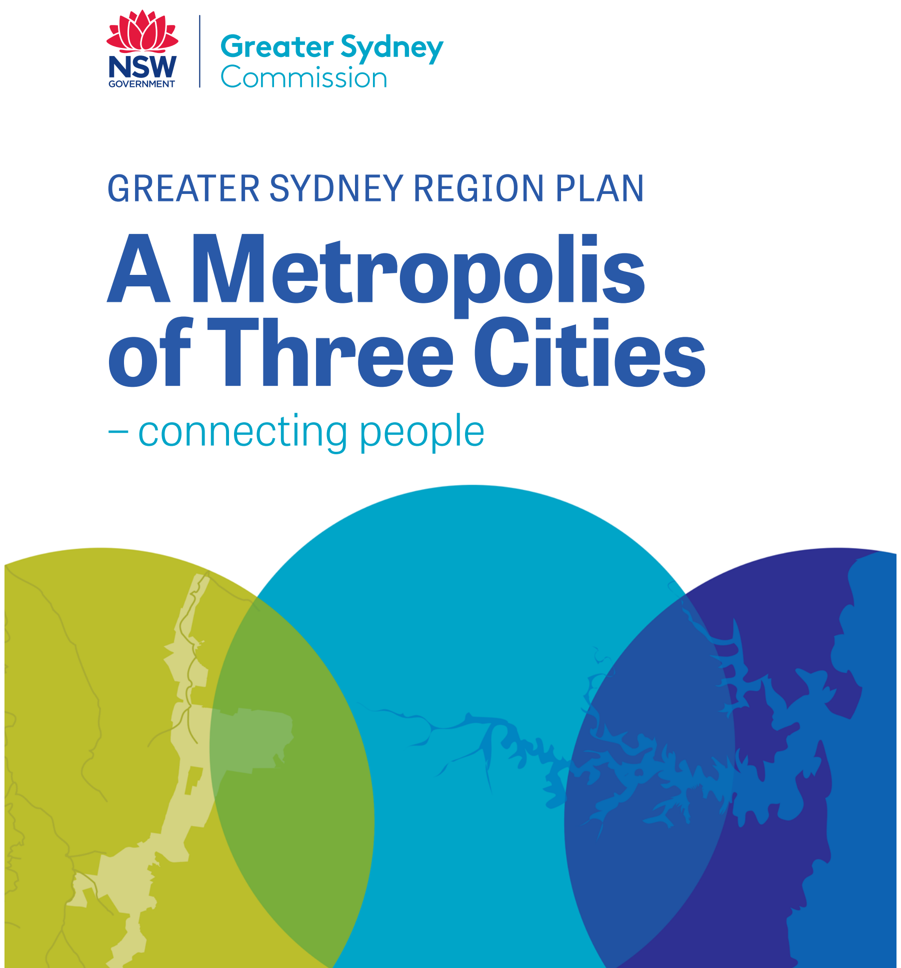


Image: Site Location Plan (Source: Six Maps) - Site boundary in

Site Location

Metropolitan Context - A Metropolis of Three Cities

(previously A Plan for Growing Sydney)



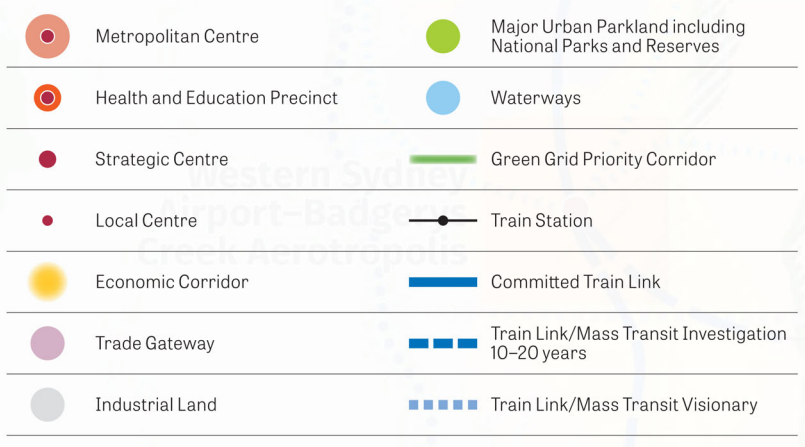
1.3 Metropolitan Context - A Metropolis of Three Cities

(previously A Plan for Growing Sydney)

In the recently released Greater Sydney Regional Plan titled "A Metropolis of Three Cities" detailing the strategic future direction of the city, the Department of Planning & Environment has established 5 different districts, including the South District where Beverly Hills Town Centre is located.

This Regional Plan supersedes the previous one entitled "A Plan of Growing Sydney", though both shared a lot of similarities.

Within the South District plan Kogarah and Hurstville



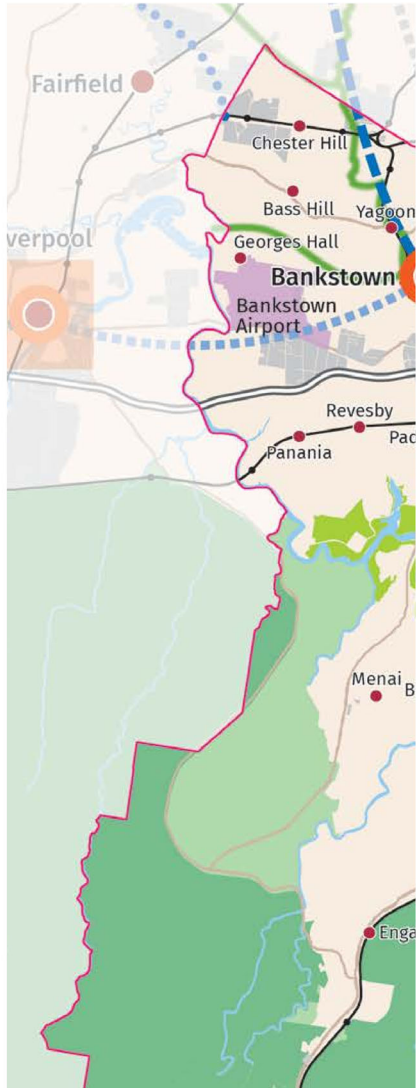


Image: South District Plan
Source - Department of Planning & Environment NSW

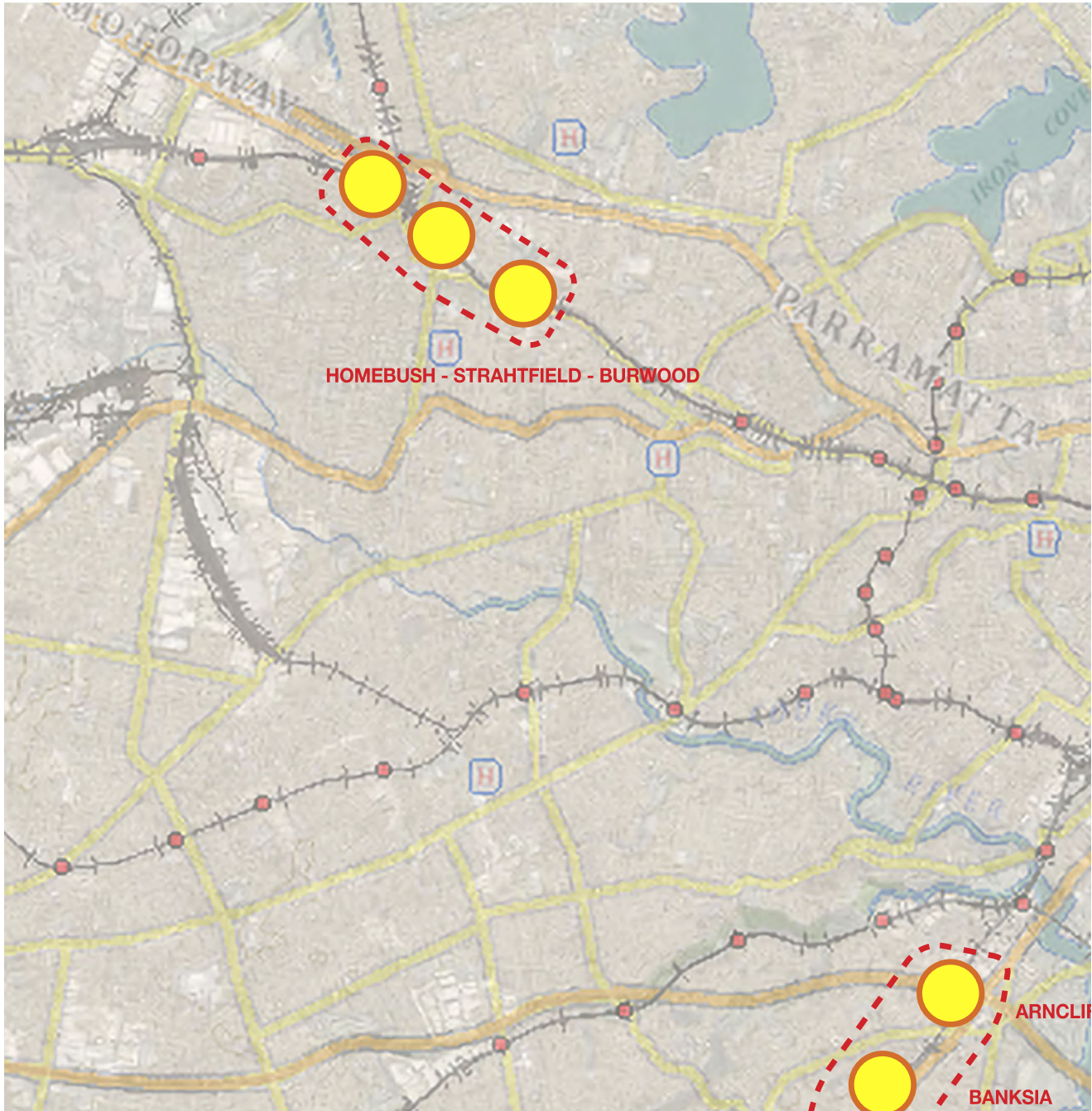
Metropolitan Context - Town Centres

The potential role of Beverly Hills in the Metropolitan context Is yet to be realised and there are many reasons for the centre playing a more important role in the future of Sydney. Recent changes to the status of the T2 railway line and the upgrade of the M5 intersection support a more important role.

The Department of Planning and Environment's "A Metropolis of Three Cities" offers the possibility of Beverly Hills growing. In Its "South District Plan" shows an Urban Renewal corridor along the T2 Railway Line which includes the study area. It also shows an area for Urban Renewal Investigation along King Georges Road, also in the study area and the M5 being upgraded as part of West Connex up to King Georges Road.

All these planning initiatives indicate a greater role and future development of Beverly Hills. The Regional Plan indicates that Kogarah and Hurstville are strategic centres. Whilst Beverly Hills does not contain the range of uses, services and transport infrastructure as Kogarah and Hurstville, Beverly Hills could be a complementary centre in a cluster of centres.

Priority Centres have been nominated in clusters by the DPE - Burwood, Strathfield and Homebush and Arncliffe, Banksia and Rockdale.



Metropolitan Context - Connectivity

Case Study Analysis - Mascot

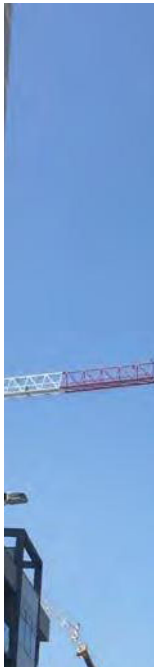
MASCOT TOWN CENTRE

The development controls for Mascot Town Centre around the train station were developed by Olsson Associates for the Department of Planning and the City of Botany Bay. They have an FSR of 3.5:1 and a building height of 44m. Compliance with the SEPP 65 RFDC was part of site testing in preparation of the LEP and DCP. The town centre has been largely built in the past decade in compliance with these controls.

Mascot has been developed as a high density environment with buildings up to 14 storeys while still providing a great pedestrian environment with generous landscaped streets. The buildings present a 4 storey podium with active street frontages that generate a vibrant neighbourhood

CURRENT P

Zoning
FSR
Max. Heigh



Case Study Analysis - Strathfield

STRATHFIELD TRIANGLE

The planning controls for the Strathfield Triangle are the result of extensive Urban Design work developed by Olsson & Associates. The controls are tailored for each specific site and are the result of the building envelopes prepared by the office. Each site was tested individually and developed to comply with the relevant apartment design standards. The result is a high density environment with great amenity and attractive public domain.

The development at the Strathfield triangle is a great example of a 9-storey urban boulevard and how this type of buildings help to frame the street creating a sense of place and giving the area a distinct urban character.

Olsson & Associates designed 2 of the 9-storey corner buildings along Parramatta Road.

CURRENT P

Zoning
FSR
Max. Heigh

Case Study Analysis - Hurstville

HURSTVILLE TOWN CENTRE

As with the Strathfield triangle, the planning controls for Hurstville Town Centre are tailored for each site to ensure an optimum urban design outcome. Small sites near the railway station are given higher FSR and building heights, sites to the North have a lower height to avoid overshadowing. Corners are reinforced by having one or two extra storeys. The LEP controls are complemented by a Town Centre Specific DCP

Olsson & Associates prepared the first built form based DCP for the Town Centre.

The images below show a recent DA submitted bythe office for a 9-storey building on Park Road adjacent to the Westfield Shopping Centre

CURRENT P

Zoning

FSR

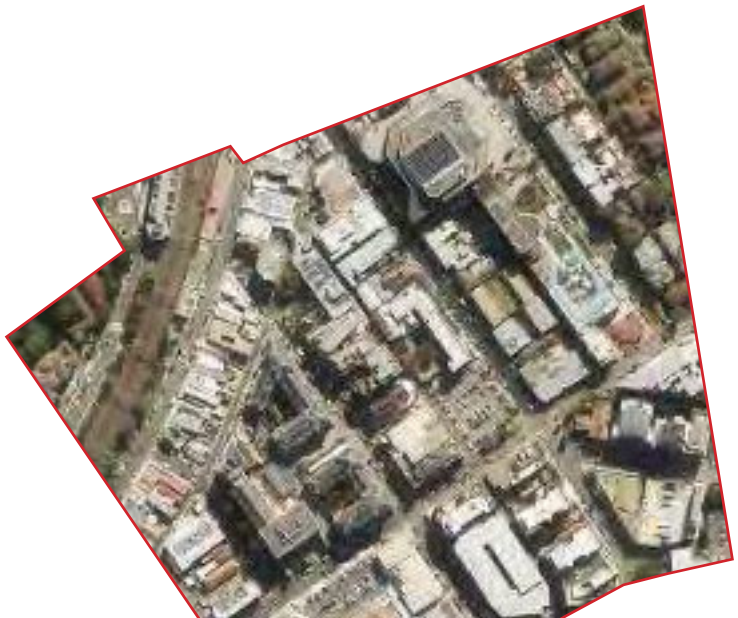
Max. Heigh

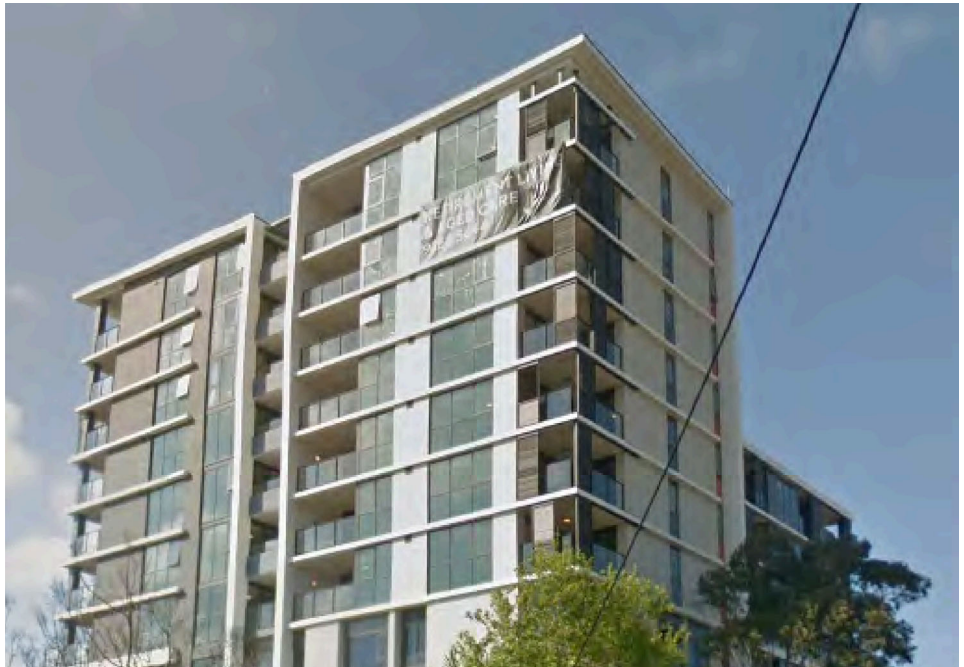
Case Study Analysis - Kogarah

KOGARAH TOWN CENTRE

Kogarah town centre presents a very efficient and structure urban grid that facilitates high density urban development without relatively excessive height. Olsson & Associates prepared the DCP No. 5 for the area and for the development of Kogarah Town Square. The most recent controls are 4:1 and 4.5:1 across the town centre with a lower edge near the station to create a lower streetscape along Railway Parade to keep the character of the original town.

The area presents examples of 9 and 12 storey buildings along Princess Highway with a lower level podium and active frontage and higher elements on the corners. Olsson & Associates prepared the masterplan and built form study for the building below. St. Patrick's Green Aged Care for Greengate Developments





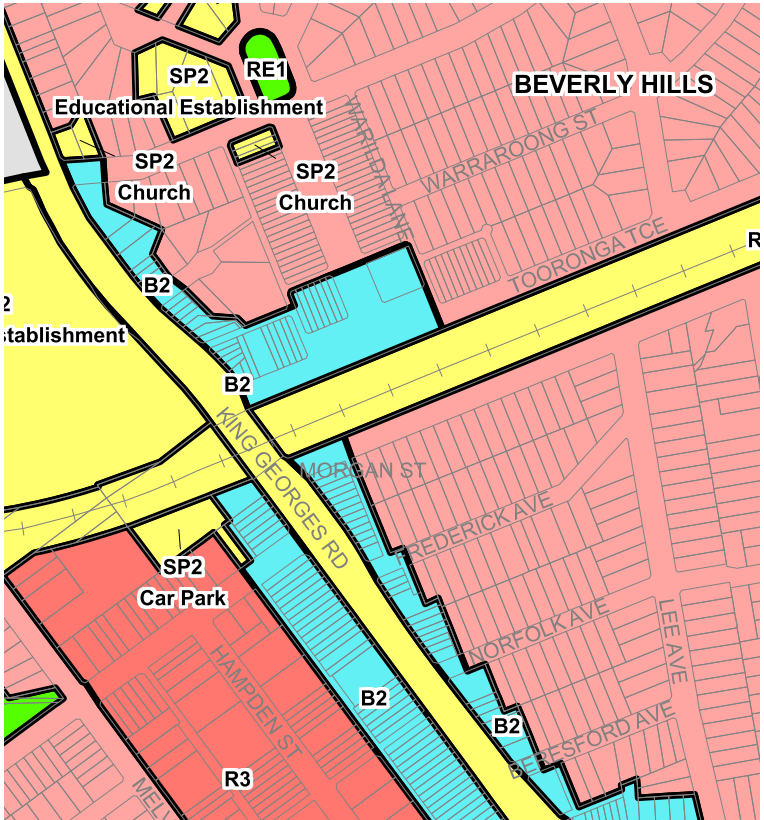
CURRENT P

Zoning
FSR
Max. Heigh

Existing Planning Controls

The existing planning controls acknowledge the structure and hierarchy of the town centre organized around King Ge
in terms of the FSR and Height assigned to the different sites. The controls do not take in consideration the present ir

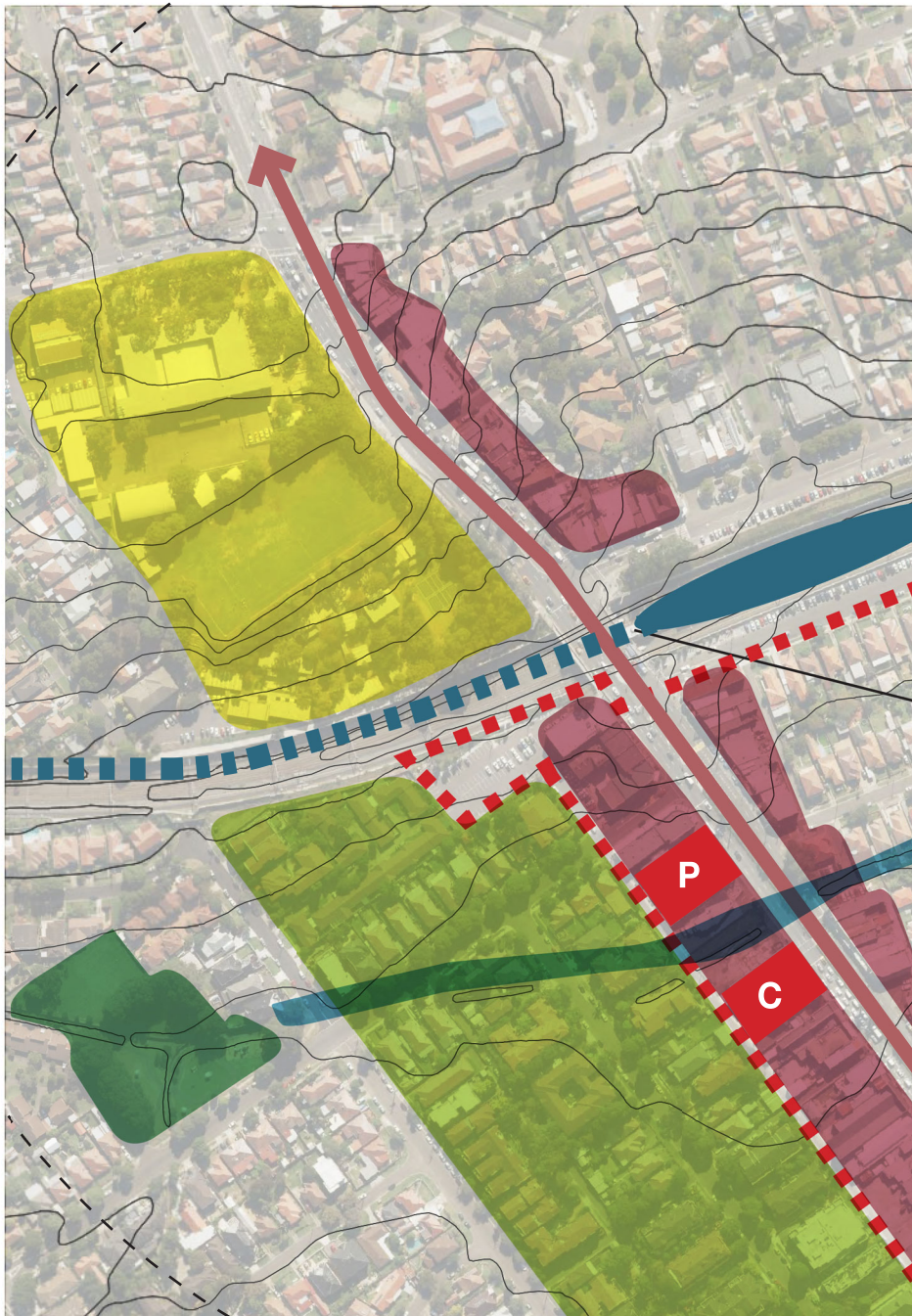
The controls also fail to acknowledge the potential of the blocks east to King Georges Road assigning them low densi
with the recent metropolitan strategy and need to be updated.



Site Analysis

LEGEND

- Major Roads
- Railway
- Railway Station
- Water Canal (Area subject to flooding)
- Park
- Medium Density Residential
- Educational Facilities
- Commercial Strip
- Planning Proposal Boundary
- P — Beverly Hills Hotel Site
- C — Cinema Site



SITE CHARACTERISTICS

- Educational facilities at both ends of the Town Centre (North & South)
- Situated on a Valley, both the Station and the South end are on a high point, the centre of the boulevard at the lowest point
- Vibrant retail and recreational area with numerous restaurants and entertainment options including Cinemas.
- Western side presents medium density residential whilst eastern side is only low density houses
- Not many open spaces. Only park is to the west

CONSTRAINTS

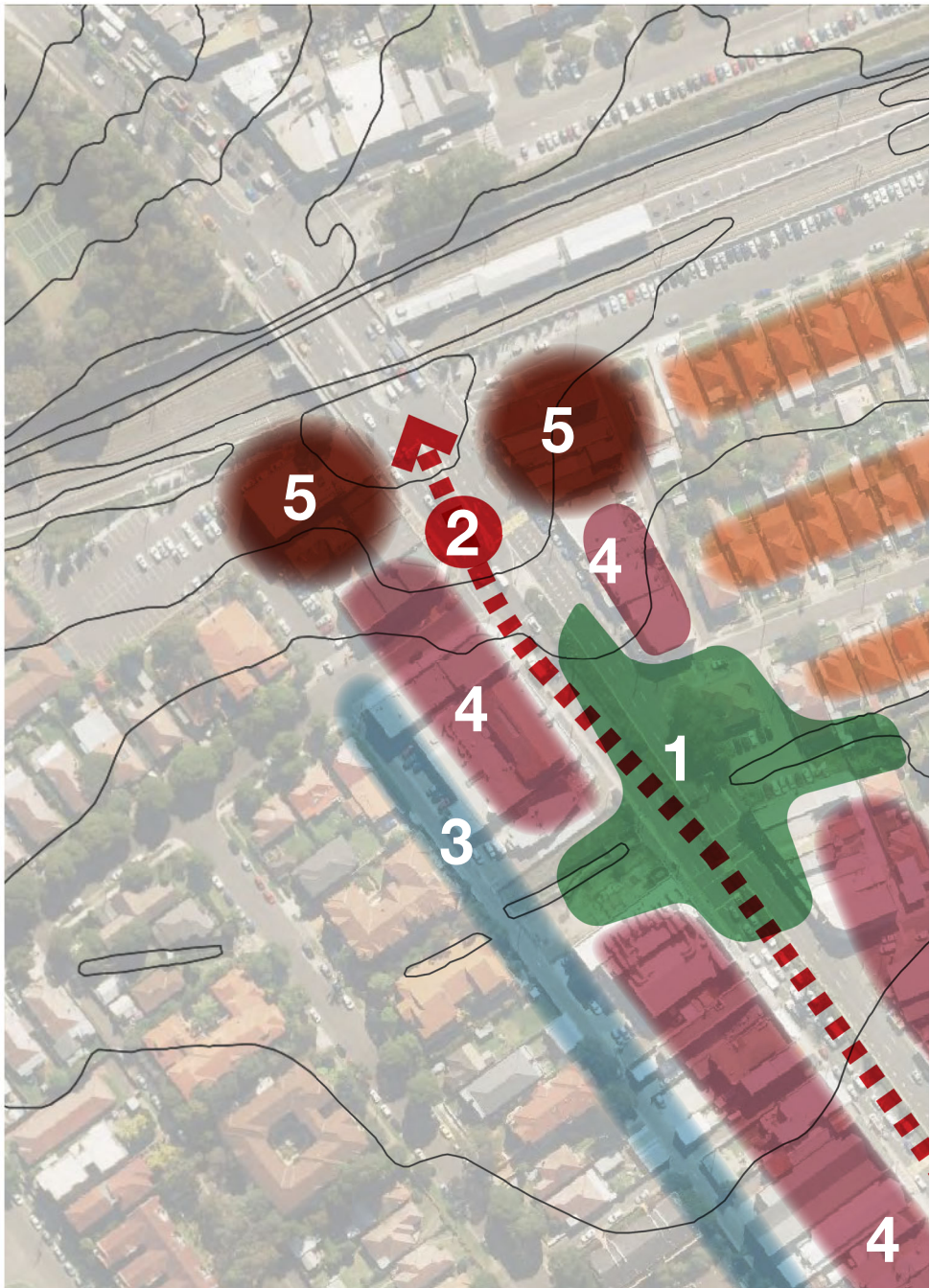
- Low level area is subject to flooding and it is currently occupy by a water canal
- Lack of landscaped areas
- Lack of servicing lanes
- Small lots ownership pattern
- Potential overshadowing impacts to developments to the West

OPPORTUNITIES

Precinct Vision

Our vision is to transform Beverly Hills into a vibrant mixed use centre with nightlife activating a contemporary boulevard built form, with residential apartments based on sustainability principles and design excellence

Urban Design Principles



1. Enhance the sense of place

Activate the centre with retail and nightlife, tree planting and widened footpaths for greater pedestrian amenity.

2. Create an attractive and vibrant boulevard

Develop the urban potential of the 30m wide road with complementary built form that defines the space and makes a great urban boulevard.

3. Design a small streetscape on the rear lane

The existing street Is one sided and run down. New 2 storey residential over a commercial ground floor addresses the street with facades that complement the scale of the existing 3 and in storey apartment buildings.

Masterplan

A SENSE OF PLACE

Beverly Hills town centre is unique in the region and yet the opportunity exists to enhance its identity and role in the region. Beverly Hills Is unique in having an emergent entertainment and dining role in the region. However the King Georges Road shops are run down and the sites under utilised. The nightlife and dining character have the potential to be reinforced with newer diverse uses.

The current identity of Beverly Hills is primarily related to the study area, from King Georges Road south of the train station to Stoney Creek Road. Urban spatial analysis reveals why this is such an imageable place in the region. King Georges Road is the widest road in the region, forming an important link between the Princes Highway and the M5. At Beverly Hills It is 30 m wide, equivalent to the southern end of George Street Sydney, and one of the widest streets in metropolitan Sydney.

King Georges Road at Beverly Hills is highly image able due to the topography, the existing landscape and the commercial uses. The commercial strip sits within a valley, rising at either end near the train station and Stoney Creek Road. This creates spatial enclosure of the commercial area at either end. The avenue of Palm trees Is a distinctive landscape feature. Any sense of place currently possessed by the commercial centre is due to the wide road overlaid on the topography, and the landscaped central median.

A New Urban Boulevard

Urban BOULEVARDS have a distinguished history that precedes and supports this design approach. Boulevards in European cities such as Paris are relatively wide, spatially well-defined and provide for pedestrians, on-street parking, landscaped medians and car lanes. It is this multi-dimensional character that prevents boulevards from being car dominated.

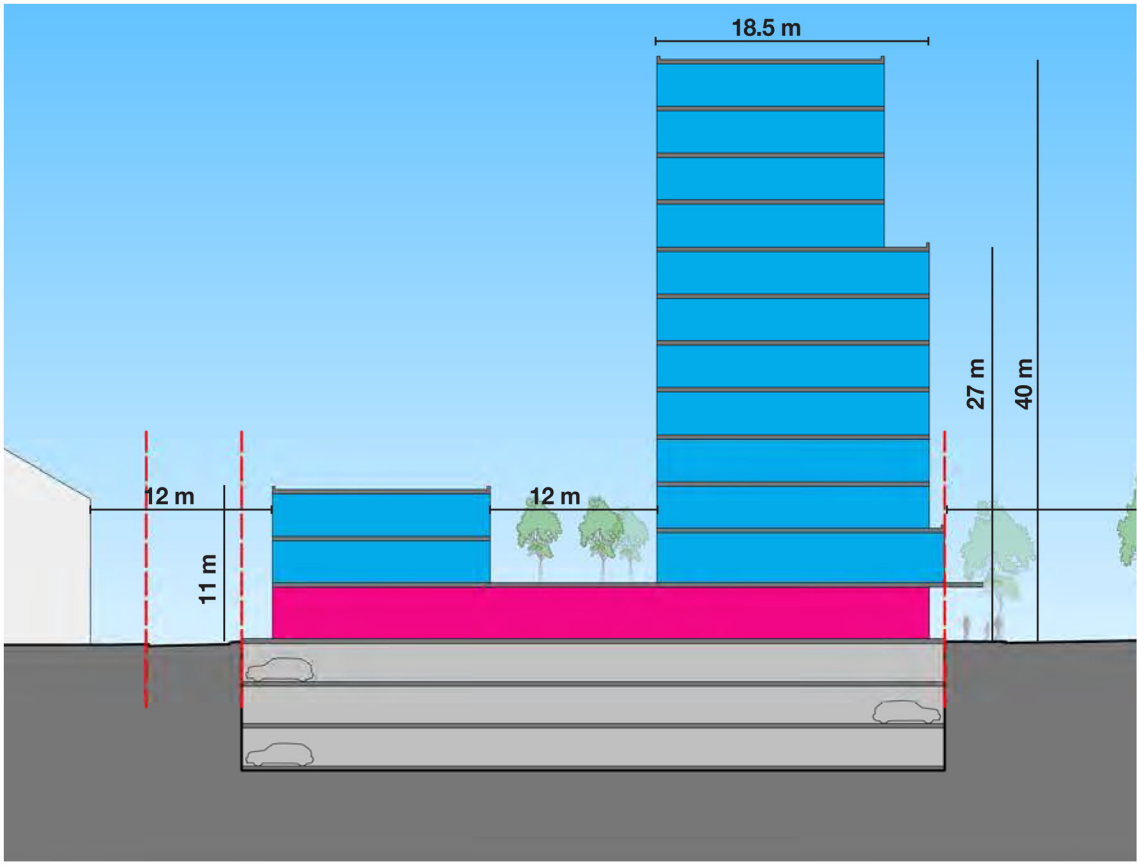
It is essential in King Georges Road that these elements of the boulevard are maintained and reinforced, and that the RMS is resisted in possible future proposals to delete on-street parking and road widening. We have proposed a widened footpath onto the existing properties only at ground floor level. These strategies aim to maintain the amenity and commercial vitality of the centre.

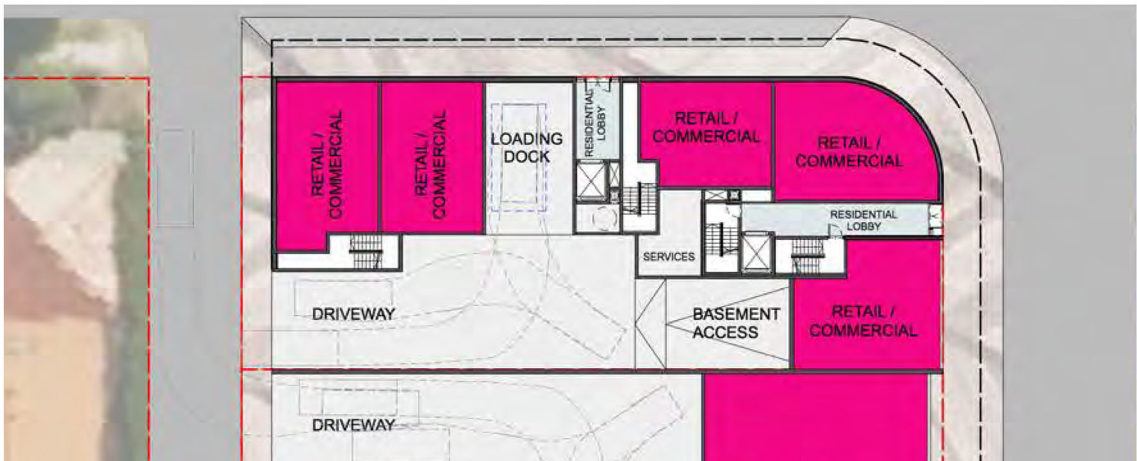
Many of the great European boulevards such as the Boulevard St Michel and the Boulevard St Denis, in Paris, have a street wall height of approx 30m(7-9 storeys) and a height to width proportion of approximately 1:1

The book "Great streets" considers for a street to be spatially well defined, it should have a height to width ratio between 2:1 and 0.5:1.

Our proposed building heights of 8 and 12 storeys have a height to width ratio of 1:1 to 1.4:1. The space is well defined without being overbearing and good solar access is achieved into the public domain, particularly due to the 8 storey buildings on the N-E side of the road.

4.5 Street Sections and Ground Floor Diagrams





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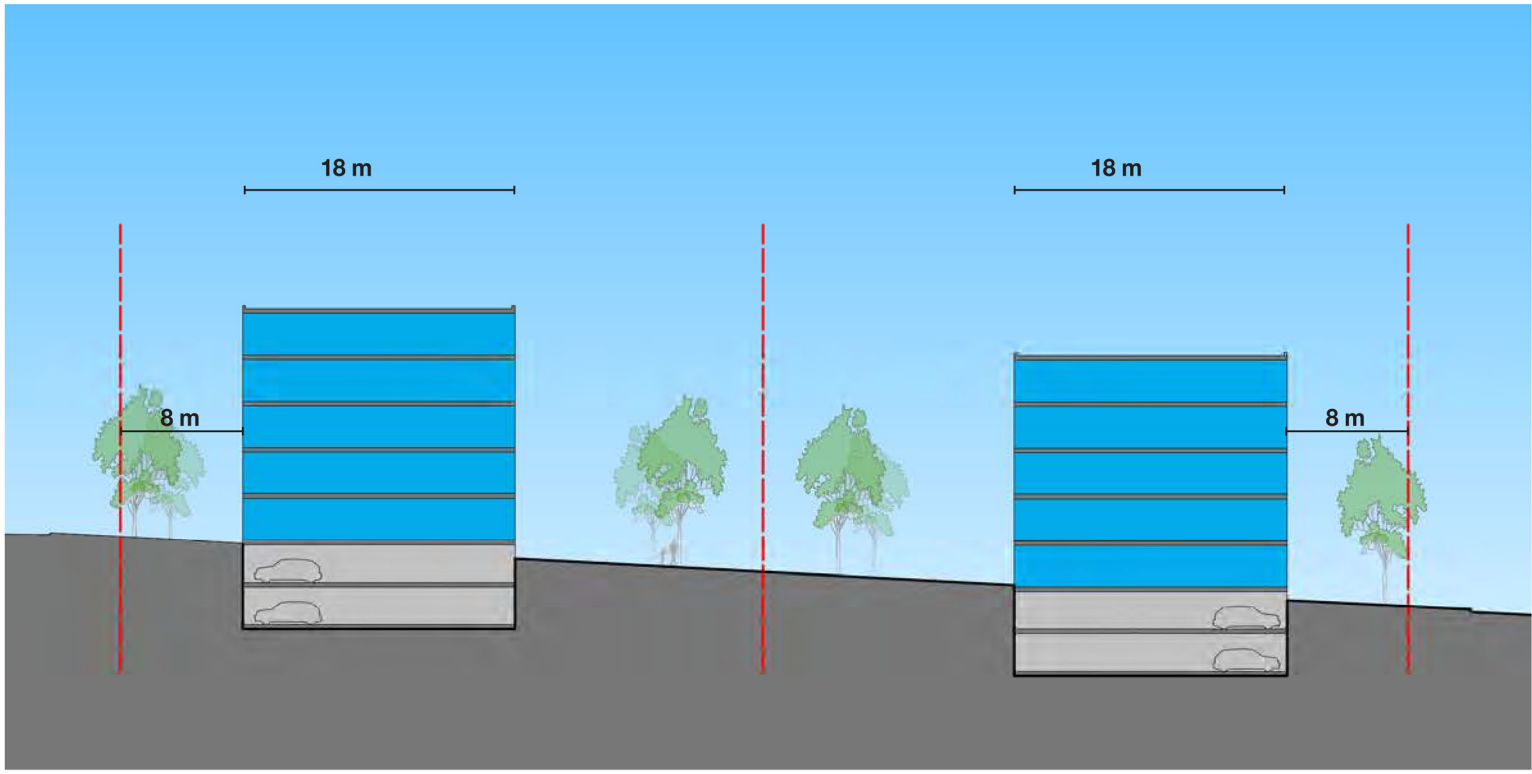


Concept Images

Concept Images

Concept Images

Potential Planning Controls

THE RE-DEVELOPMENT OF RETAIL AND COMMERCIAL CENTRES

Sydney contains many retail / commercial based town centres at train stations. These are typically small lots in multiple ownerships with multiple small businesses. The key to their re-development is to create enough development potential In terms of FSR, height and land uses for the sites to amalgamate and develop. Site amalgamations are generally necessary to accommodate basement parking and the like. In Beverly Hills there are a number of larger sites that may not require amalgamation, or minimal amalgamation for development.

Our proposal provides the necessary yields, heights, uses and amalgamations to achieve significant re-development. We have provided this in a desirable urban form that follows established urban design principles and creates a distinctive sense of place.

RE-ZONING THE R2 SITES TO R4

Our design re-zones the R2 sites to R4, with a maximum FSR of 1.3:1

Potential Planning Controls

MAIN LEP CONTROLS

ZONING

It is suggested that the main strip along King Georges Road remains a B2 zone as per the current controls. The residential area to the East should be rezoned as R4

FSR

It is suggested that the area along King Georges Road should have an FSR between 4:1 and 5:1. The eastern residential area to the East should be given 1.3:1 FSR

MAXIMUM HEIGHT

The blocks facing King Georges road will have a maximum height between 8 on the Eastern side and 12 storeys on the Western side. The eastern residential area will be 5 storeys high.

SEPP 65 ADG COMPLIANCE

Our design approach has design excellence and sustainable design principles at its core.

URBAN DESIGN CONTROLS (DCP)

The following suggested controls apply to the blocks on the Western side of King Georges Road.

SETBACKS

Front Setbacks.(Towards King Georges Road)

- Ground Floor shop front set back 2m to widen the footpath
- Podium levels to be built to the street alignment
- 1 metre setback above podium up to level 8
- Further 3 m setback from Level 9 to level 12

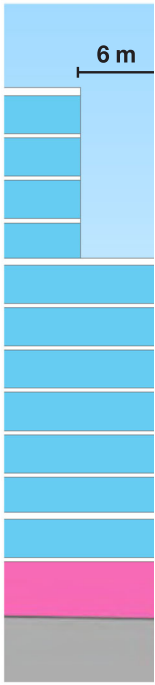
Rear setbacks. 2 metre setback from the lane

Side setbacks. Buildings can be built to the side boundary up to 8 storeys. Any element higher will need a setback between 3 and 6 m depending on the proposed openings.

STREET WALL HEIGHT

The buildings will present a 8-storey streetwall, any element higher will be set back from the street.

STREETS



Potential Planning Controls

LAND ECONOMICS

We recognise that substantial uplift in FSRs and heights are required to make re-development of a main street retail area such as this feasible. We have designed and tested all sites in the study area and have achieved the following outcomes:

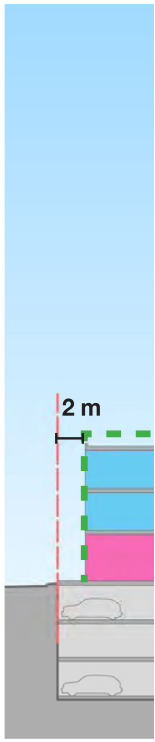
- A minimum of 4: l FSR for all sites on both sides of King Georges Road. This Includes one ground floor commercial level, calculated at a net GFA to gross envelope of 75%. All residential GFA calculations are 75% of the envelope, We have demonstrated in the following pages through detailed designs that we achieve the FSRs.

- Corner sites are more efficient than mid-block sites, and are landmark buildings. They have an FSR of 4.5: 1

- The Beverly Hills Cinema and Hotel sites are challenging to achieve the desirable FSRs and construction program. We recommend that an FSR of 5:1 be achieved on the Cinema site by having up to 3 or 4 commercial levels with a large site coverage, and 12 storey and 6 storey heights on the residential buildings (including the commercial levels). The staging of the Hotel construction will require detailed consideration during the preparation of the PP.

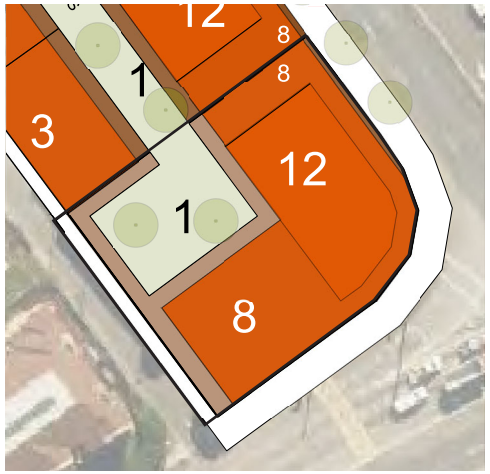
Depending on the building use it is proposed that commercial developments could achieve bonus FSR whilst maintaining the same overall building envelope. This is due to the deeper floorplates and bigger podiums that commercial and retail programmes require.

This principle of achieving an FSR bonus for multiple retail or commercial



TYPICAL RES

Block Analysis and Development Potential

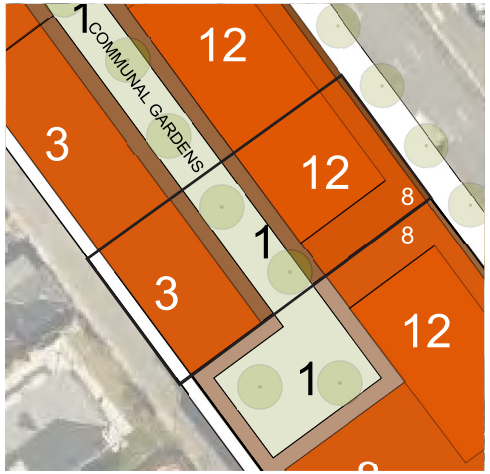


LOT A
Site Area: 1689 m²

Calculated approximate GFA: 7974 m²
Calculated approximate FSR: 4.72:1

Commercial GFA: 1209 m²

Residential GFA: 6765 m²
Apartment Yield: 79 - 85 apartments



LOT B
Site Area: 1052 m²

Calculated approximate GFA: 4176 m²
Calculated approximate FSR: 3.97:1

Commercial GFA: 755 m²

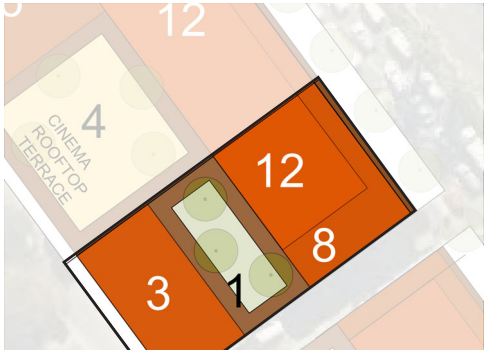
Residential GFA: 3421 m²
Apartment Yield: 40 - 43 apartments

LOT C
Site Area: 1506 m²

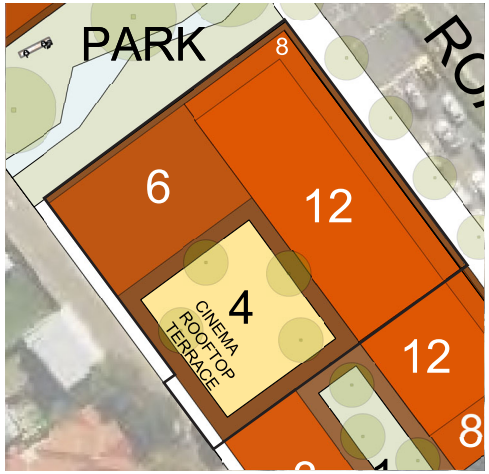
Calculated approximate GFA: 6142 m²
Calculated approximate FSR: 4.08:1

Commercial GFA: 1081m²

Residential GFA: 5061m²
Apartment Yield: 59 - 63 apartments



Block Analysis and Development Potential

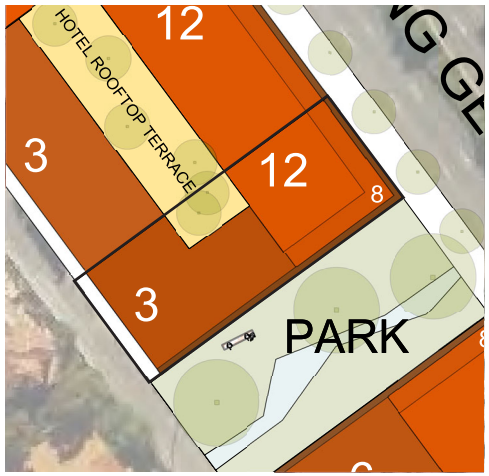


LOT G
Site Area: 2017 m²

Calculated approximate GFA: 11701 m²
Calculated approximate FSR: 5.8:1

Commercial GFA: 6722 m²

Residential GFA: 4979 m²
Apartment Yield: 58 - 62 apartments

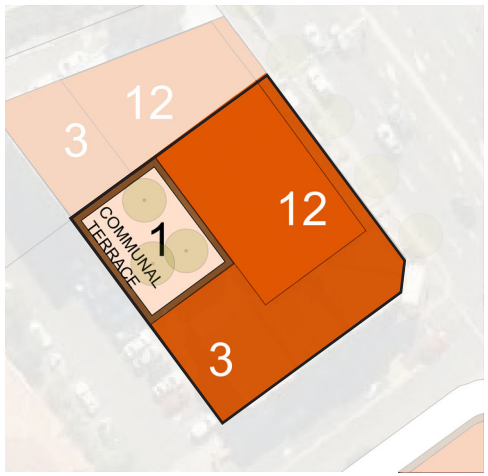


LOT H
Site Area: 868 m²

Calculated approximate GFA: 3571 m²
Calculated approximate FSR: 4.11:1

Commercial GFA: 622 m²

Residential GFA: 2949 m²
Apartment Yield: 34 - 37 apartments

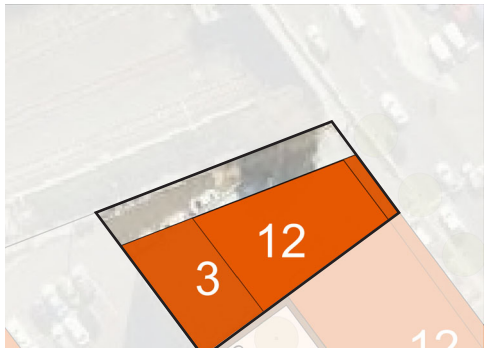


LOT I
Site Area: 1690 m²

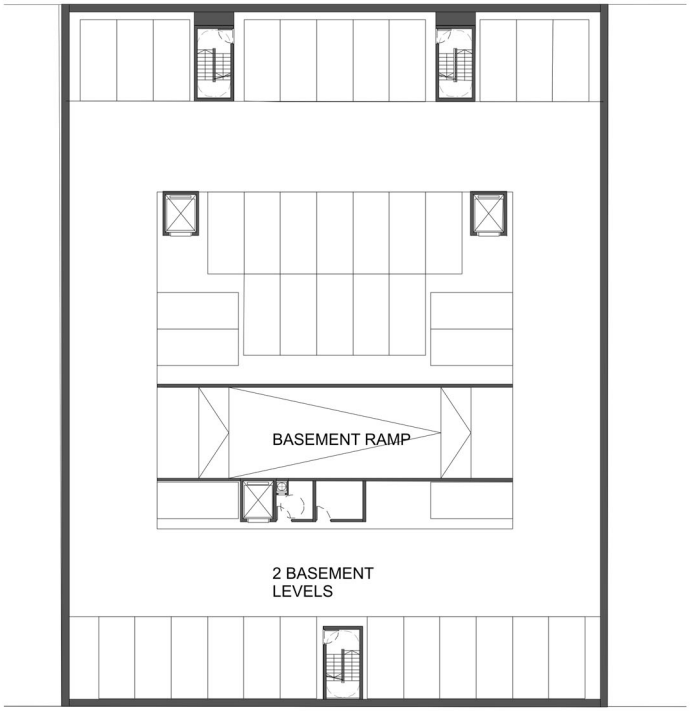
Calculated approximate GFA: 6922 m²
Calculated approximate FSR: 4.1:1

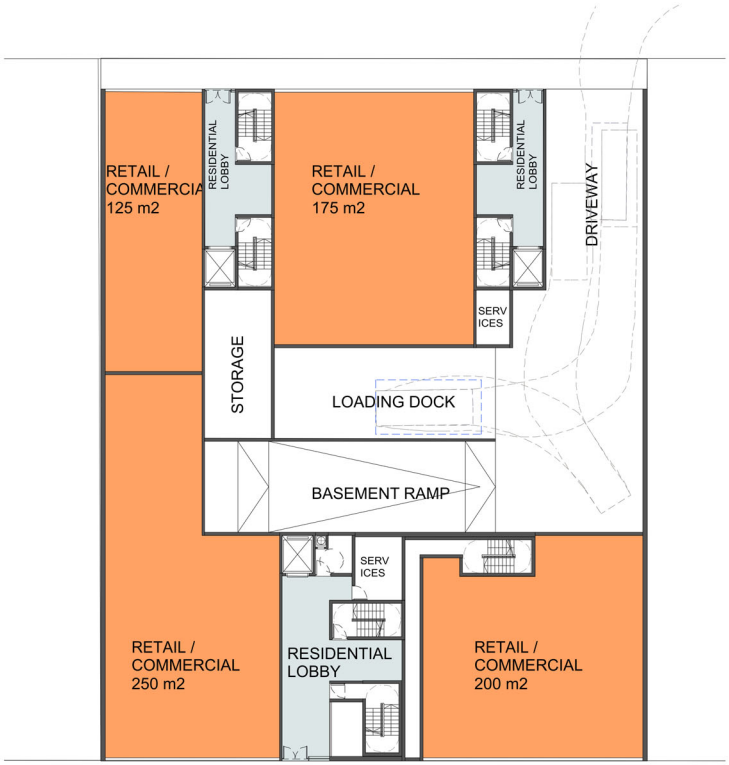
Commercial GFA: 1212 m²

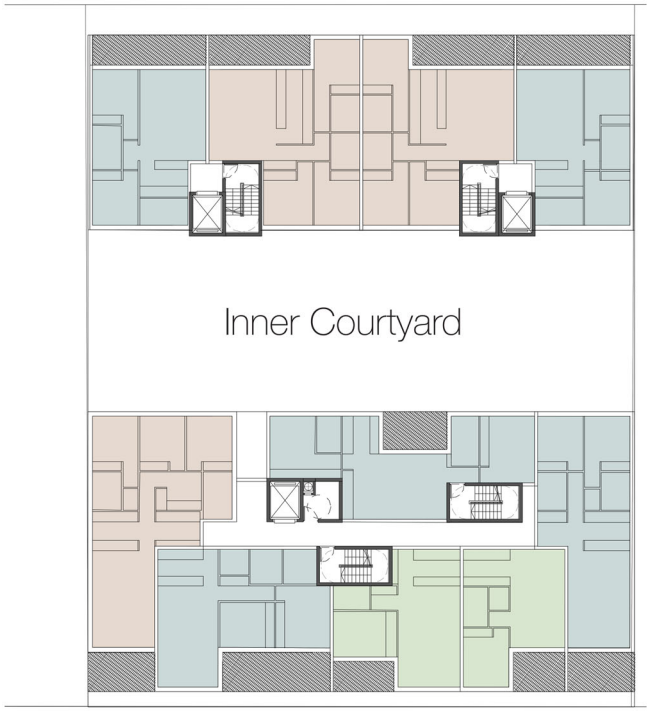
Residential GFA: 5710 m²
Apartment Yield: 67 - 71 apartments



6.2 Typical Block Study - King Georges Road West







King Georges Road

Basement Plan

Ground Floor Plan

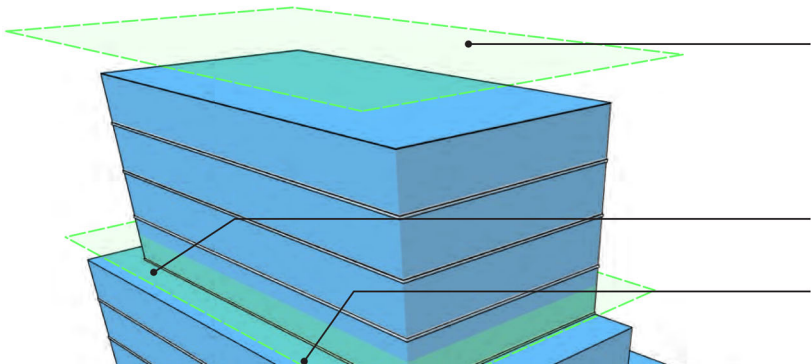
Typical Residential Plan

PROPOSED CONTROLS
Height: 12 Storeys
FSR: 4:1

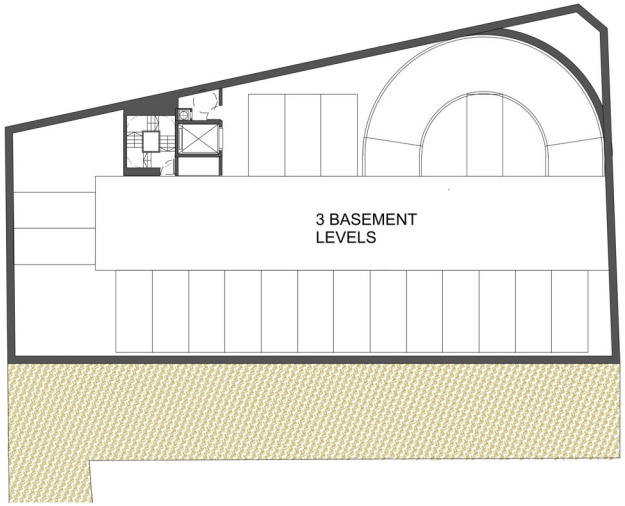
DETAILED BLOCK ANALYSIS
Site Area: 1675m^2

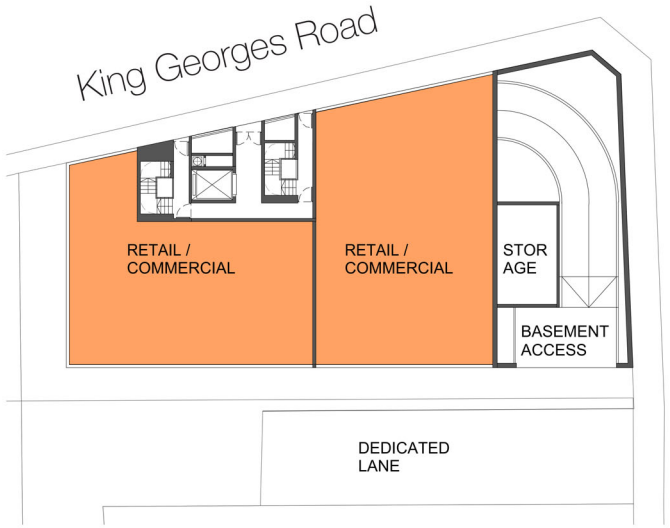
Proposed GFA: 6,700m^2
Proposed FSR: 4:1

Commercial GFA: 950m^2



6.2 Typical Block Study - King Georges Road East





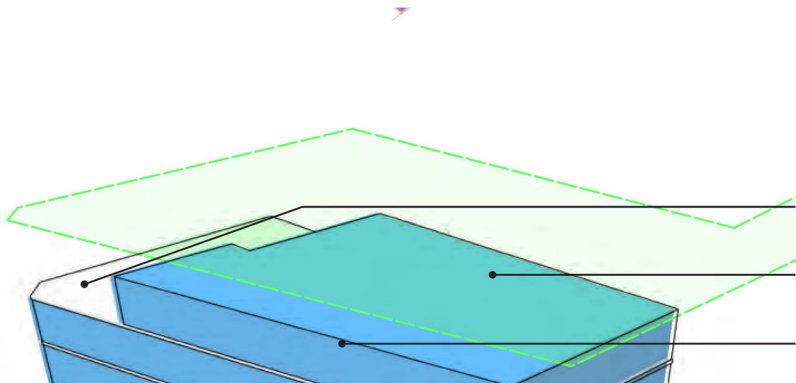
Basement Plan | Ground Floor Plan | Typical Residential Plan

PROPOSED CONTROLS
Height: 8 Storeys
FSR: 4:1

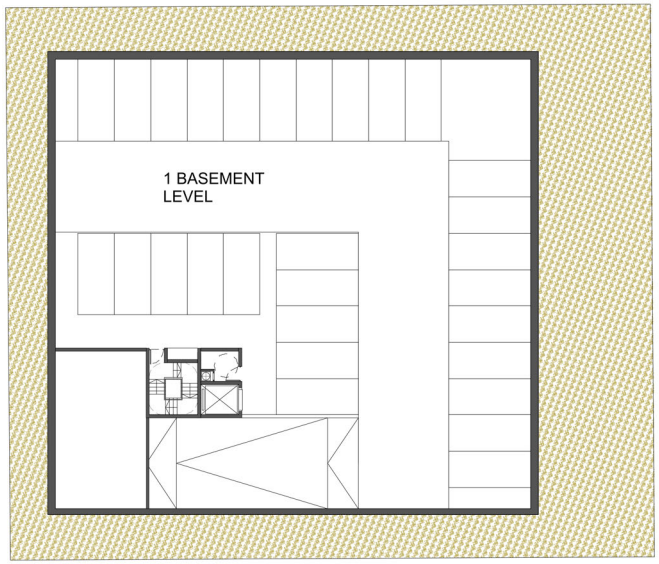
DETAILED BLOCK ANALYSIS
Site Area: 970m^2

Proposed GFA: 3,880m^2
Proposed FSR: 4:1

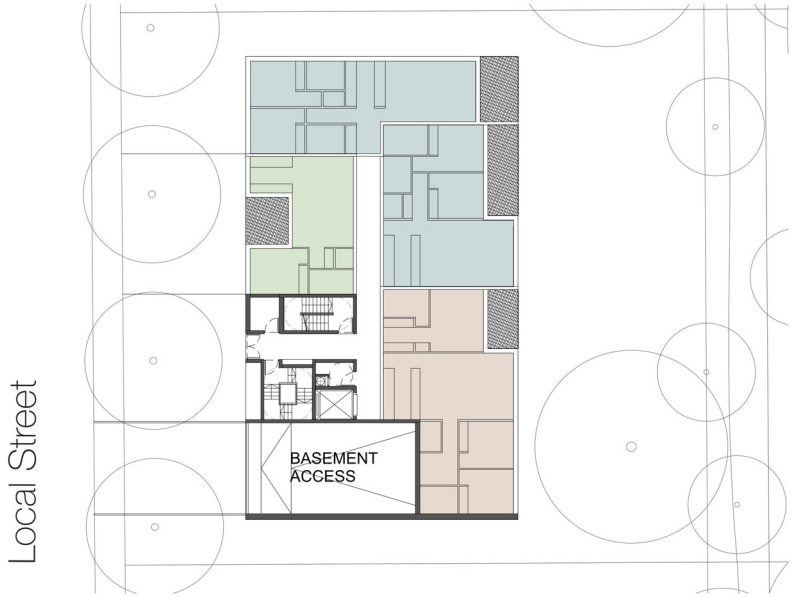
Commercial GFA: 420m^2



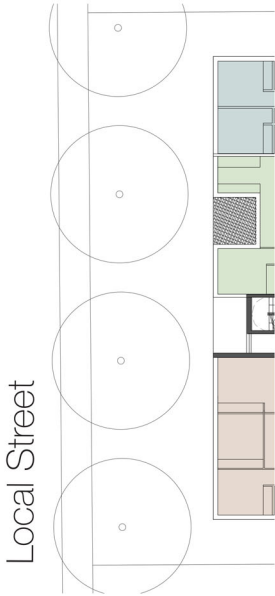
6.2 Typical Block Study - Medium Density Area



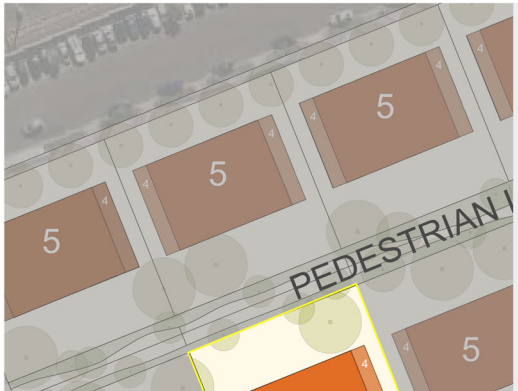
Basement Plan



Ground Floor Plan



Typical Resi

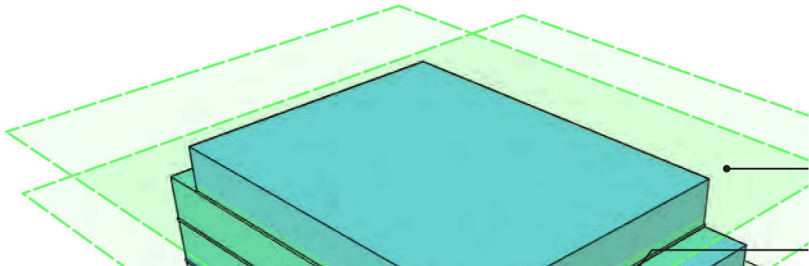


PROPOSED CONTROLS
Height: 5 Storeys
FSR: 1.3:1

DETAILED BLOCK ANALYSIS
Site Area: 1,555m^2

Proposed GFA: 2,020m^2
Proposed FSR: 1.3:1

Residential GFA: 2,020m^2



Overshadowing Diagrams

MINIMISING OVER SHADOWING.

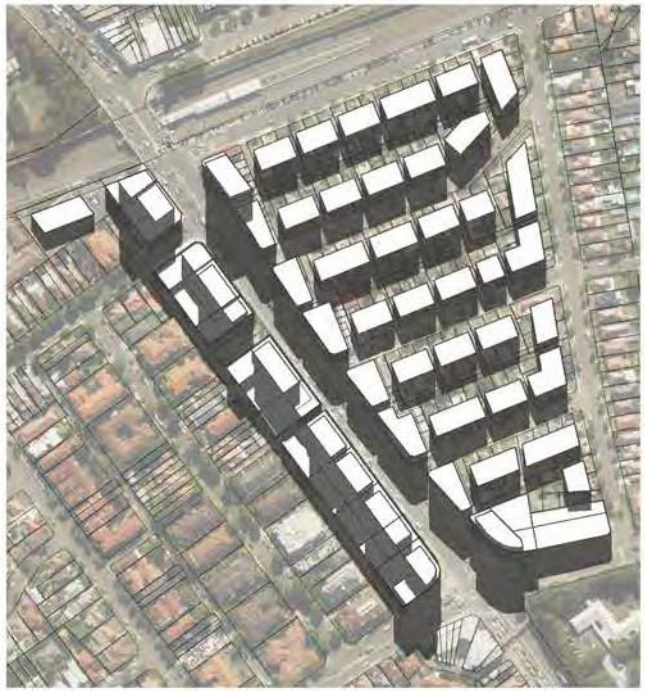
Our design approach maximises yield while minimising overshadowing.

The existing apartment buildings on the Western side of the rear street maintain good solar access. In mid-winter these buildings are not

WINTER SHADOWS / 21st June

9.00 AM

12.00 PM



EQUINOX SHADOWS / 21st March

9.00 AM

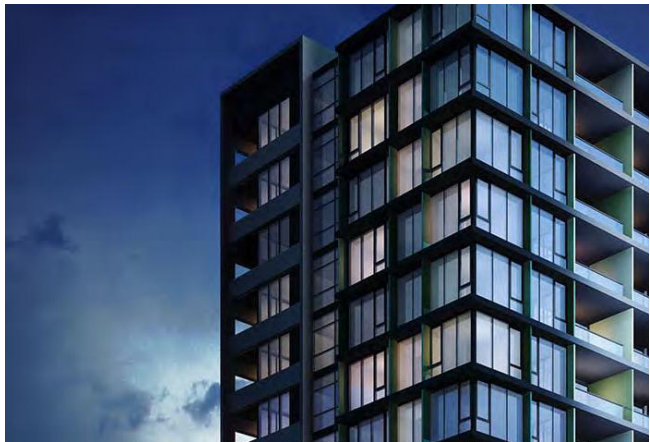
12.00 PM

Architectural References

Architectural References

Architectural References

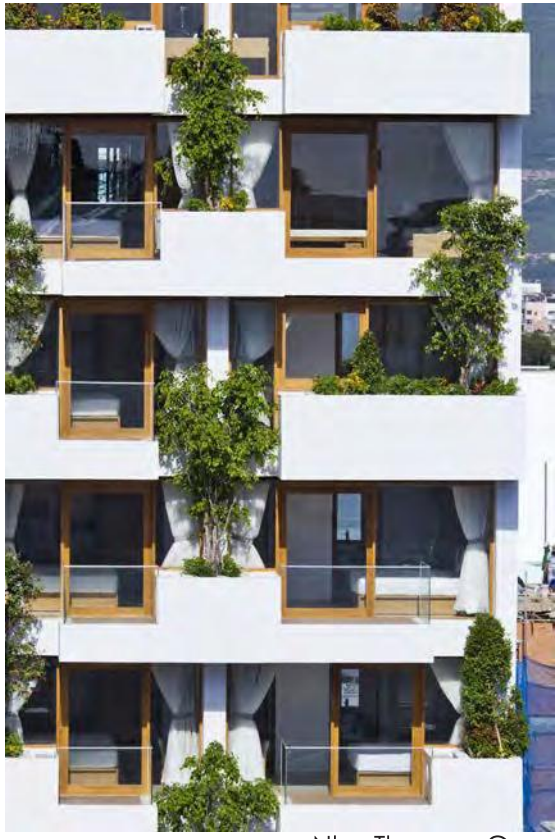
Victoria Park, Zetland
Turner Architects, Sydney



Architectural References

Architectural References

Recessed Balcony/ Loggia - Irregular Pattern



Nha Thrang - Green Balcony Facade

Juliet Balcony ,
Clear glass sides
and coloured fronts
serving as sculptural
details for the facade

Bal

Beverly Hills Town Centre Planning Proposal

Stage 1 - Preliminary Concept Design

prepared for :Beverly Hills Owners Association incorporated

March / Issue B

Appendix D

Historical Aerial Photographs

Council Records

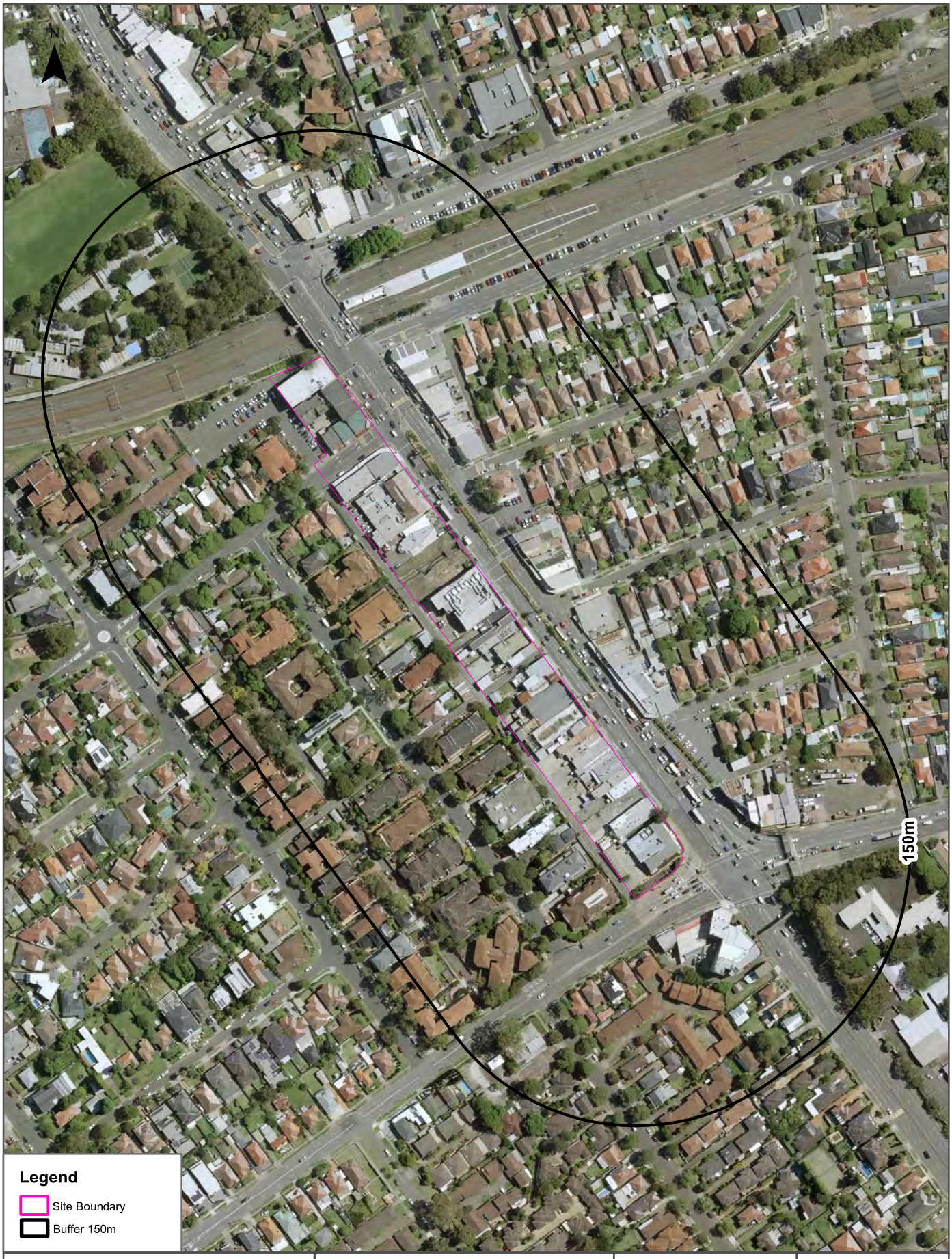
Date: 21 Apr 2021

Reference: LS031377 EA

Address: 409-511 King Georges Road, Beverly Hills, NSW 2209

Aerial Imagery 2022

409-511 King Georges Road, Beverly Hills, NSW 2209



Scale:	Data Source Aerial Imagery:	Coordinate System:	Date: 21 April 2022
0 40 80 120 160 Meters	© Aerometrex Pty Ltd	GDA 1994 MGA Zone 56	

Aerial Imagery 2016

409-511 King Georges Road, Beverly Hills, NSW 2209

Scale:	Data Source Aerial Imagery:	Coordinate System:	Date: 21 April 2022
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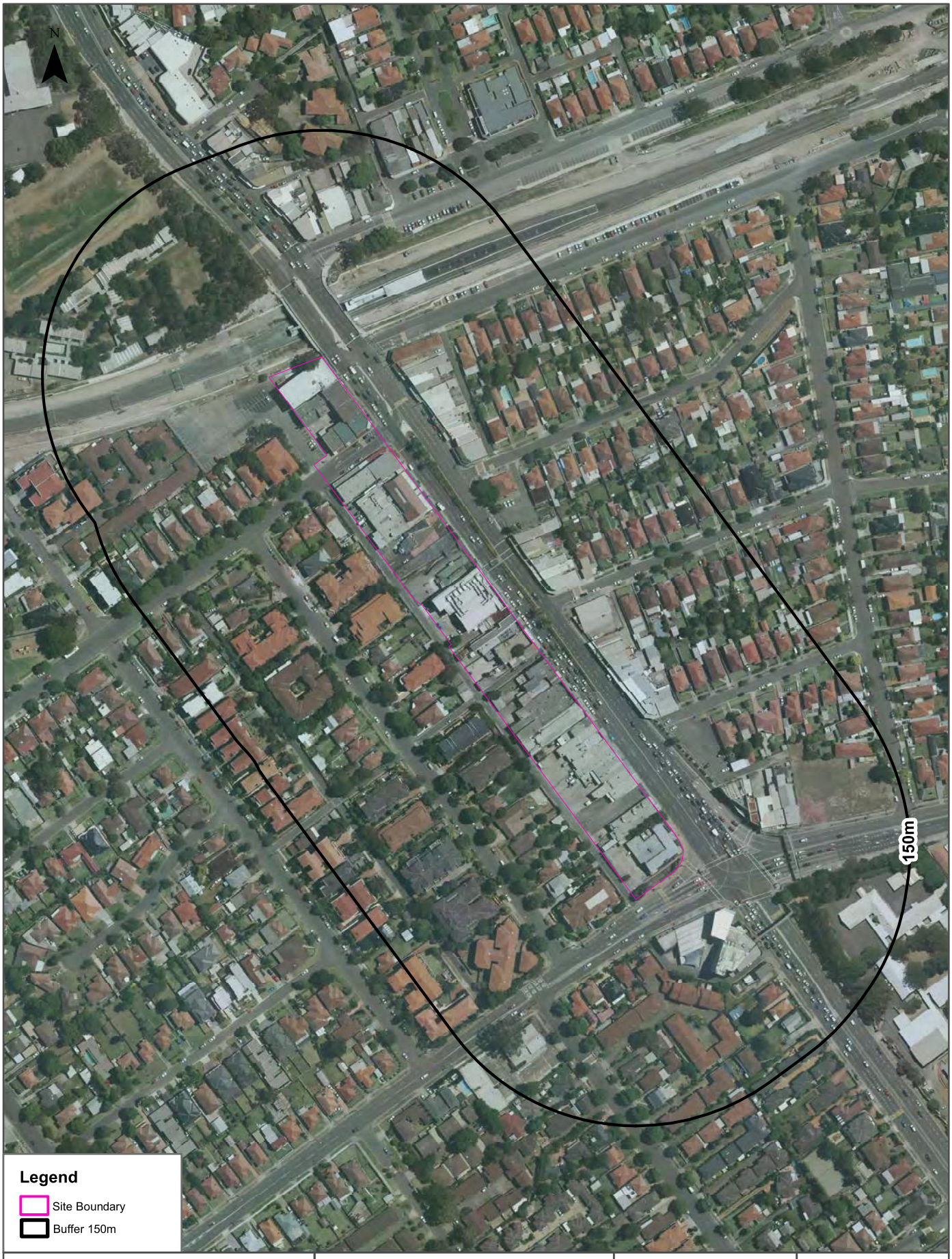
Aerial Imagery 2011

409-511 King Georges Road, Beverly Hills, NSW 2209



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Aerial Imagery 2005

409-511 King Georges Road, Beverly Hills, NSW 2209

Data Source Aerial Imagery: © Aerometrex Pty Ltd	Coordinate System: GDA 1994 MGA Zone 56	Date: 21 April 2022

Aerial Imagery 2000

409-511 King Georges Road, Beverly Hills, NSW 2209

Scale:	Data Source Aerial Imagery:	Coordinate System:	Date: 21 April 2022
0 40 80 120 160 Meters	© Aerometrex Pty Ltd	GDA 1994 MGA Zone 56	

Aerial Imagery 1994

409-511 King Georges Road, Beverly Hills, NSW 2209

Scale:
0 40 80 120 160
Meters

Data Source Aerial Imagery:
© NSW Department of Customer Service

Coordinate System:
GDA 1994 MGA Zone 56

Date: 20 April 2022

Aerial Imagery 1991

409-511 King Georges Road, Beverly Hills, NSW 2209

Aerial Imagery 1986

409-511 King Georges Road, Beverly Hills, NSW 2209

Scale:	Data Source Aerial Imagery:	Coordinate System:	Date: 20 April 2022
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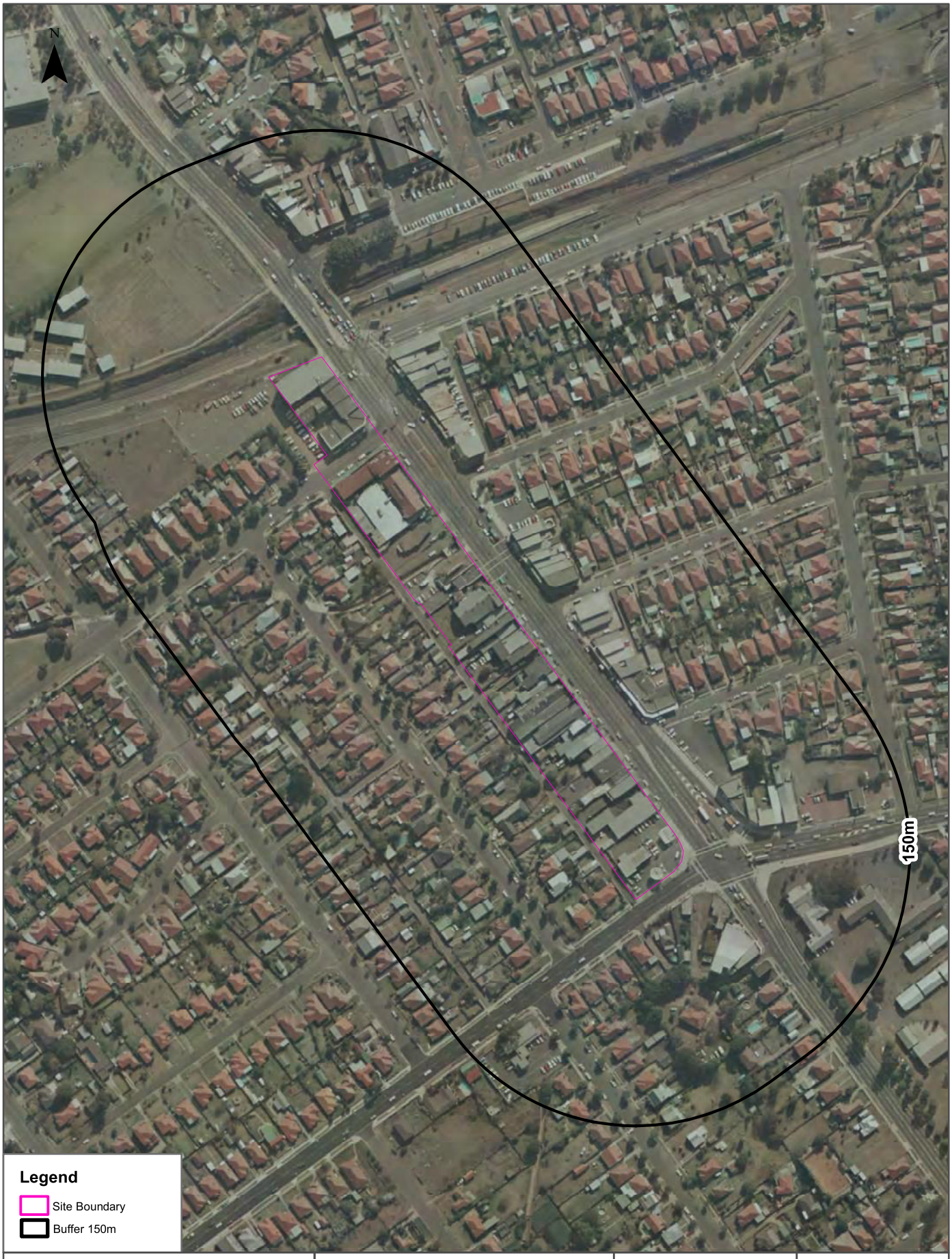
Aerial Imagery 1982

409-511 King Georges Road, Beverly Hills, NSW 2209



Data Sources: Aerial Imagery:
© NSW Department of Customer Service

Coordinate System:
GDA 1994 MGA Zone 56

Date: 21 April 2022

Aerial Imagery 1978

409-511 King Georges Road, Beverly Hills, NSW 2209

Aerial Imagery 1970

409-511 King Georges Road, Beverly Hills, NSW 2209

Data Sources: Aerial Imagery:
© NSW Department of Customer Service

Coordinate System:
GDA 1994 MGA Zone 56

Date: 21 April 2022

Aerial Imagery 1965

409-511 King Georges Road, Beverly Hills, NSW 2209

Scale:	Data Source Aerial Imagery:	Coordinate System:	Date: 20 April 2022
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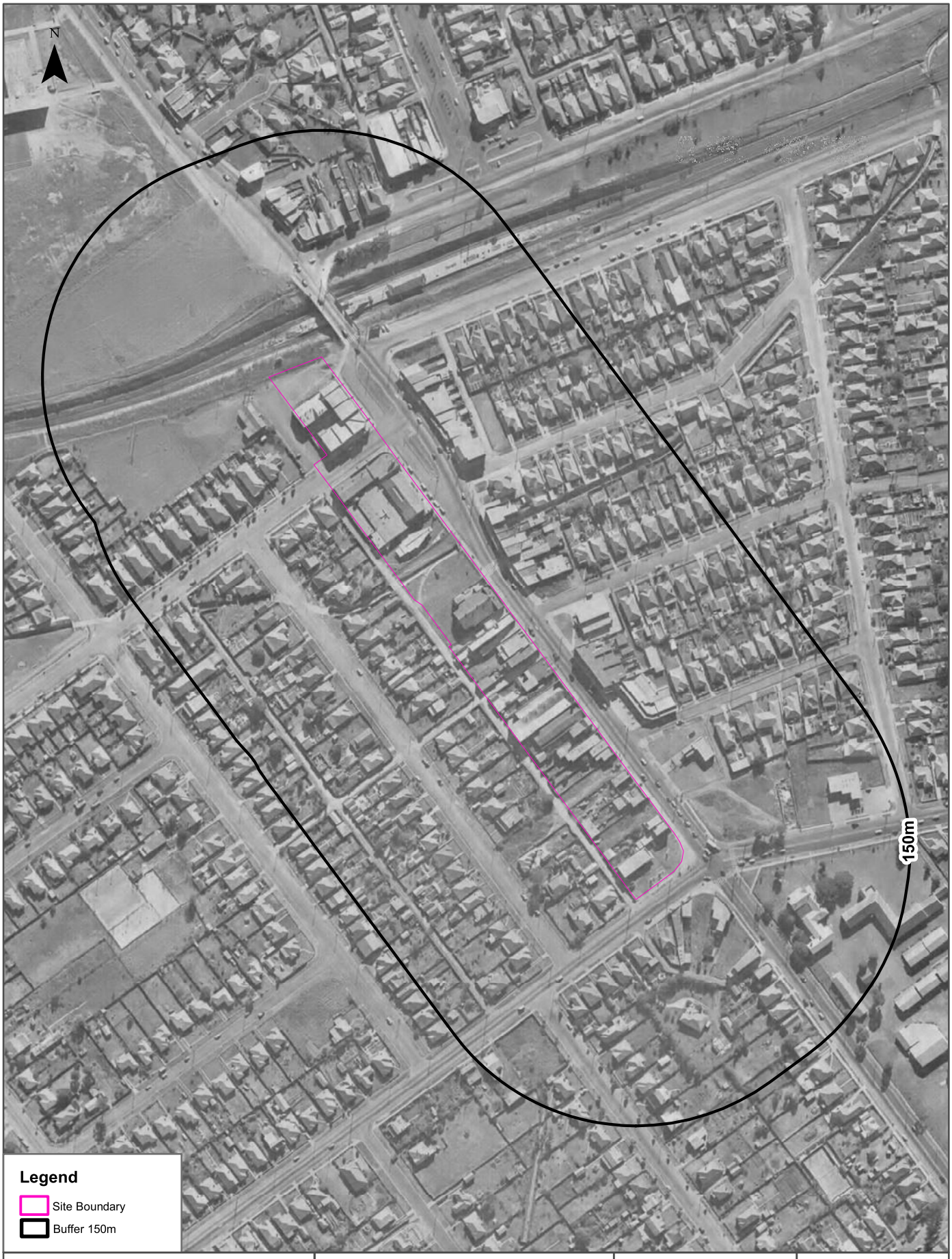
Aerial Imagery 1961

409-511 King Georges Road, Beverly Hills, NSW 2209



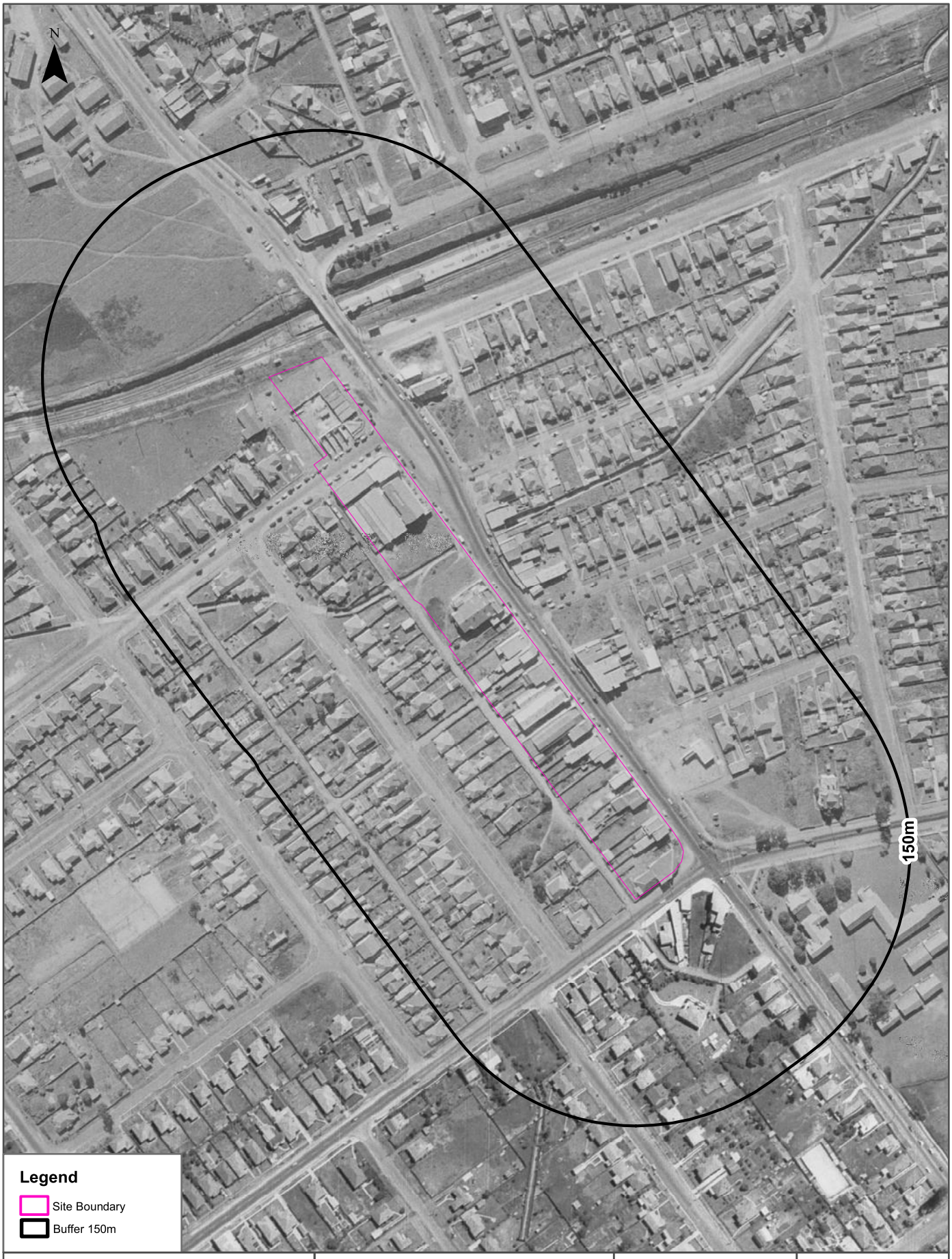
Data Sources: Aerial Imagery:
© NSW Department of Customer Service

Coordinate System:
GDA 1994 MGA Zone 56

Date: 21 April 2022

Aerial Imagery 1955, 1956

409-511 King Georges Road, Beverly Hills, NSW 2209

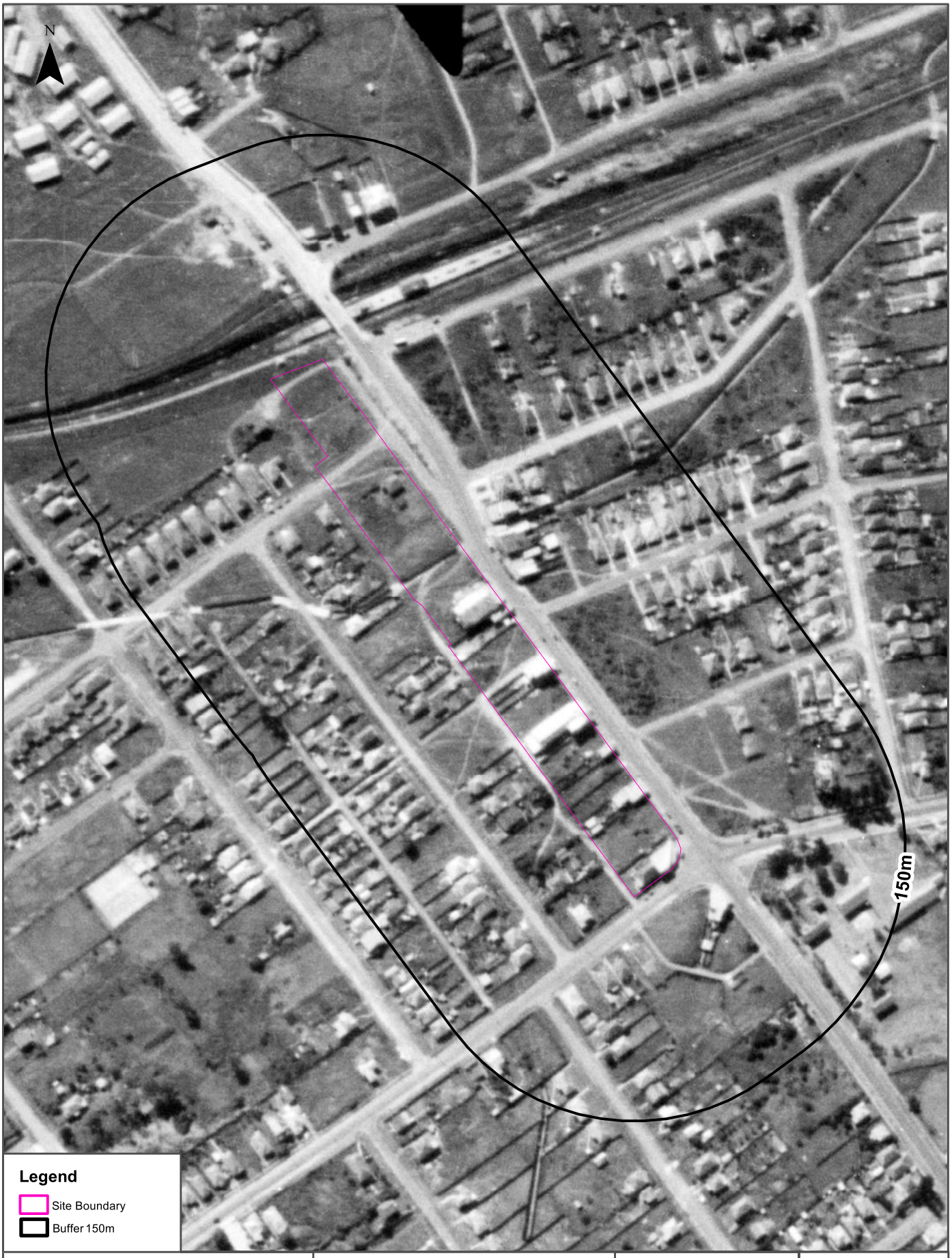


Aerial Imagery 1951

409-511 King Georges Road, Beverly Hills, NSW 2209

Aerial Imagery 1949

409-511 King Georges Road, Beverly Hills, NSW 2209



Scale:	Data Source Aerial Imagery: ©2022 Geoscience Australia	Coordinate System: GDA 1994 MGA Zone 56	Date: 20 April 2022

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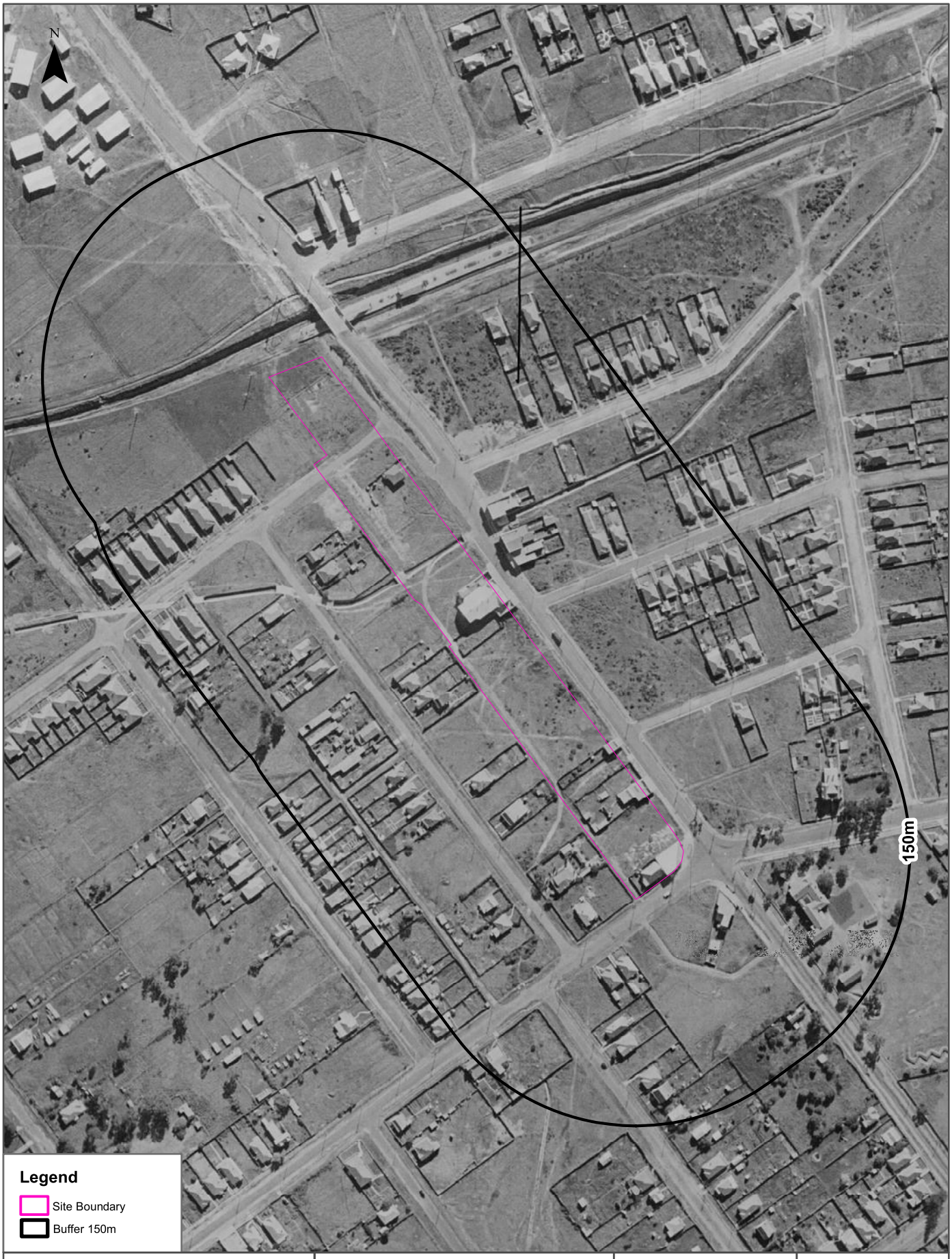
Meters

Aerial Imagery 1943

409-511 King Georges Road, Beverly Hills, NSW 2209



Scale: 0 40 80 120 160 Meters	Data Source Aerial Imagery: © Aerometrex Pty Ltd	Coordinate System: GDA 1994 MGA Zone 56	Date: 21 April 2022

Aerial Imagery 1930

409-511 King Georges Road, Beverly Hills, NSW 2209

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Jelica Ljubic

From: Svemir Popovic <SPopovic@georgesriver.nsw.gov.au>
Sent: Wednesday, 25 May 2022 2:52 PM
To: Wen-Fei Yuan
Subject: Request for Access to Information - GIPAA - 409-511 King Georges Rd Beverly Hills

Dear Sir/Madam,

I refer to your informal application for information lodged under the Government Information (Public Access) Act 2009 (GIPAA) relating to the properties at 409-511 King Georges Rd, Beverly Hills.

I advise that after an initial search of summary records it was found that the area you are seeking information for is comprised of 27 retail/commercial properties each with various businesses that are either current or have operated there in the past. They are mostly restaurants and food shops. In this regard, there are hundreds of Development/Building/Complying Development Applications.

The majority of the files relating to these applications are hardcopy files stored offsite. A thorough search of all applications will require a significant amount of time. Unfortunately we do not have the resources to undertake the entirety of this research at this time.

From our initial search we did not locate any documents dating from the early 1970s that would determine the following:

* Contamination assessment reports and remediation action/management plans;
* Approval for the installation of under/aboveground storage tanks;
* Previous commercial/industrial activities;
* Storage of large quantities of hazardous chemicals on site;
* Complaint letters regarding use of unauthorised filling on site, illegal dumping of contaminated material on site and/or release of contaminants from the site.

We did however locate a file for the property at No. 507-5017 King Georges Road, which was used as a petrol station from the 1950s until its closure in 1987. A restaurant was then built on the site by Development Application 87/DA-126.

Should you wish to refine your request, we will be happy to provide information relation to specific properties.

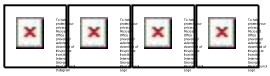
Please contact me should you require any further assistance with this matter.

Regards

Svemir Popovic **Archivist**

Georges River Council
Corner of MacMahon and Dora Streets
Hurstville NSW 2220
Phone: +61293306147

Mobile: +61437926194
Email: SPopovic@georgesriver.nsw.gov.au
www.georgesriver.nsw.gov.au



Appendix E

Site Photographs

Photo 1: General Site condition, looking south-west from across King Georges Road

Photo 2: Site condition 443-445 King Georges Road, looking south-west

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	1
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 3: Stormwater canal, 443-445 King Georges Road, looking south-west

Photo 4: Building rubble on 443-445 King Georges Road

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	2
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 5: General Site condition, northern section, looking north-west

Photo 6: General site condition, 439 King Georges Road

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	3
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 7: General site condition, 427 King Georges Road

Photo 8: General site condition, Edgbaston Road Parking

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	4
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 9: General site condition, rear of 417-425 King Georges Road

Photo 10: General site condition, rear of 407-409 King Georges Road

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	5
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

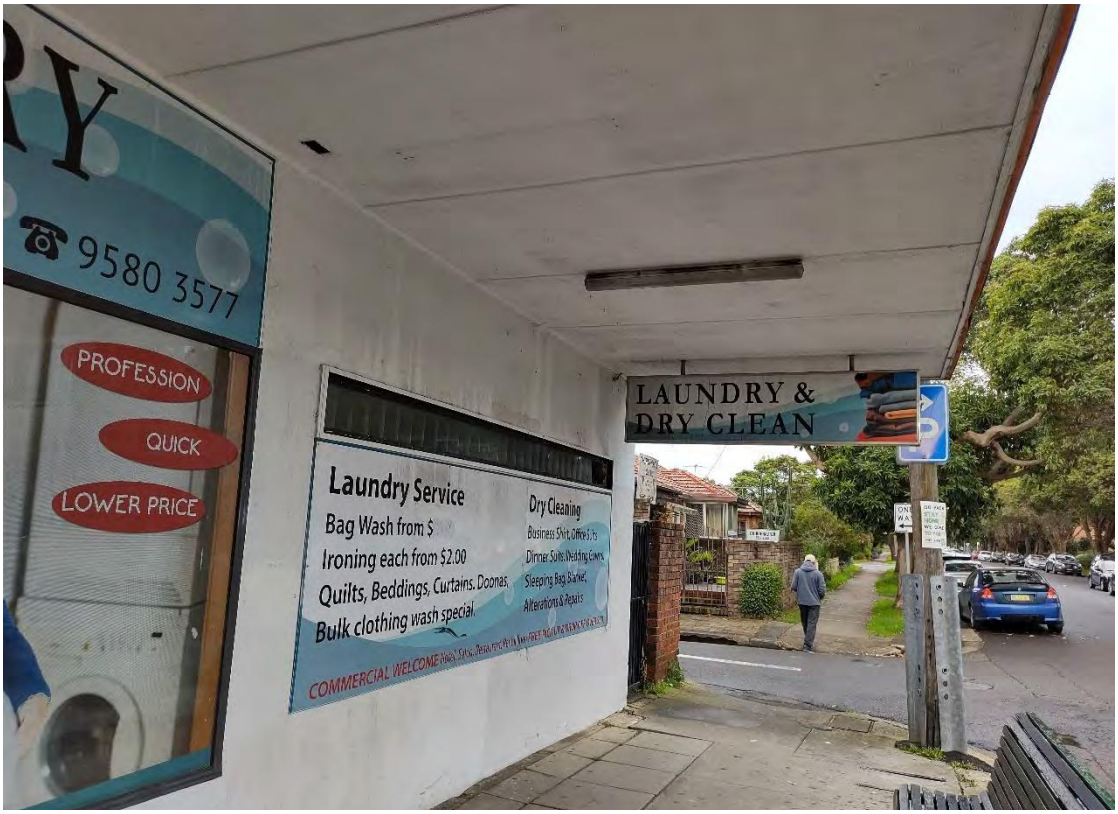


Photo 11: Dry-cleaner shop, 423 King Georges Road

Photo 12: Dry-cleaner interior, 423 King Georges Road

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	6
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 13: General site condition, Edgbaston Road, looking south-west

Photo 14: General site condition, Edgbaston Road, looking west

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	7
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 15: General site condition, King Georges Road, north-eastern facade, looking south-east

Photo 16: Electrical Transformer, Rudduck Lane, looking south-west

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	8
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 17: Genera site condition, north-eastern facade, looking north-west

Photo 18: General site condition, north-eastern facade, looking south-east

Douglas Partners Geotechnics | Environment | Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	9
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 19: General site condition, Dumbleton Lane, Looking north-west

Photo 20: General site condition, Dumbleton Lane, Looking south-east

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	10
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 21: Parking allotments, 497 King George Road, Looking west

Photo 22: King Georges Road, south-eastern site boundary, looking north

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	11
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 23: Stoney Creek Road, looking south

Photo 24: Stoney Creek Road, southern site boundary, looking east

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	12
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 25: Stoney Creek Road, south-western site boundary, looking west

Photo 26: Dumbleton Lane, south-eastern site boundary, looking north-west

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	13
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 27: Dumbleton Lane, south-eastern site boundary, looking north

Photo 28: Rear storage and parking, 477 King Georges Road, looking north-east

Douglas Partners Geotechnics | Environment | Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	14
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Photo 29: 473-477 King Georges Road, looking north-east

Photo 30: 473-477 King Georges Road, looking east

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	15
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

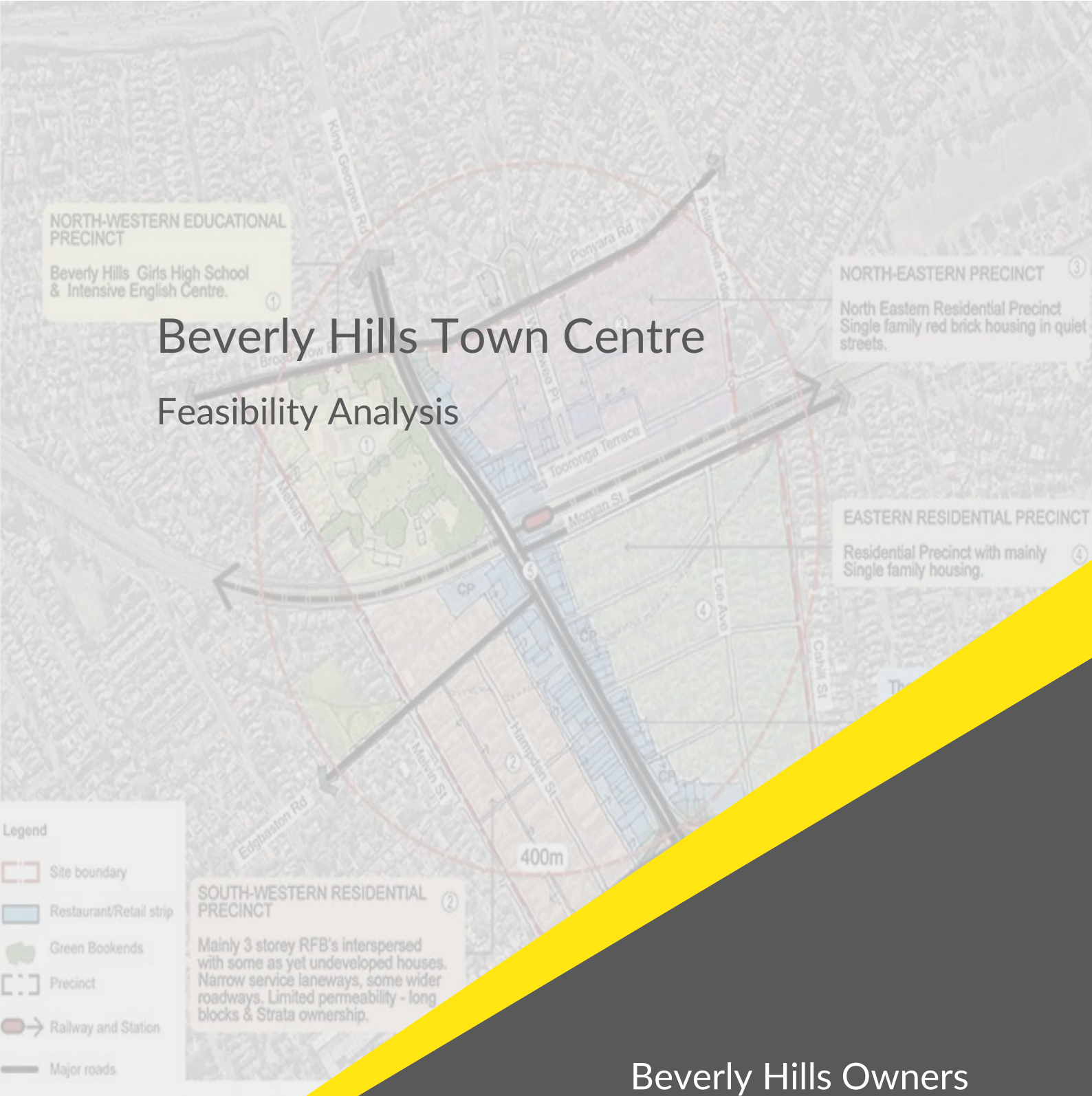
Photo 31: lecithins waste container, rear of 453 King Georges Road, looking north-east

Photo 32: General waste, rear of 453 King Georges Road, looking north-east

Douglas Partners Geotechnics / Environment / Groundwater	**Site Photographs**	PROJECT:	211987.00
	Proposed Redevelopment	PLATE No:	16
	407-511 King Georges Road, Beverly Hills	REV:	0
	CLIENT: Beverly Hills Owners Association	DATE	05/05/2022

Beverly Hills Town Centre

Feasibility Analysis



Beverly Hills Owners Association

July 2023, updated November 2023

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Document Control

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Table of Contents

Schedules

1. Introduction

1.1 Background

The Beverly Hills Town Centre (**the Town Centre**) is situated some 15km southwest of the Sydney CBD, within the Georges River LGA. The Town Centre is focused along main thoroughfare King Georges Road, where a range of retail and commercial uses are clustered within low density buildings of a fine-grain nature.

Georges River Council (**Council**) are progressing the development of a Master Plan for the Town Centre. The masterplanning process comprises Phase 1 and Phase 2. Phase 1 was completed in 2019 and involved community engagement and technical assessments to investigate land use opportunities and constraints within the Town Centre. Phase 2 is underway, which involves the finalisation of the masterplan in consideration of Phase 1 outcomes. In April 2023, Council resolved to not proceed with the exhibited Master Plan for the Town Centre. A revised draft Master Plan is underway to include considerations identified in the Council resolution.

To assist Council in the masterplanning process, The Beverly Hills Owners Association (**BHOA**) commissioned a Feasibility Analysis in 2018 (**the 2018 Study**) to assess the likely density (FSR) controls required to facilitate feasible development in the Town Centre. In 2022, the BHOA (assisted by Mecone) submitted the 2018 Study in a planning proposal (**the BHOA Planning Proposal, BHOA PP**) to Council, seeking to amend the Georges River Local Environmental Plan 2021 (**the LEP**).

BHOA Planning Proposal (2022)

The BHOA planning proposal (**BHOA PP**) applies to the western side of King Georges Road. These properties are larger, benefit from existing rear lane access and do not require compulsory acquisition. They are also adjacent to R4 High Density zoning whilst the town centre on the Eastern side of King Georges Road is adjacent to R2 Low Density zoning.

The BHOA PP proposes increased density controls in the western side of King Georges Road within the Town Centre. This includes greater building height limits and FSR controls, aligning with the planning principles identified in the April 2023 Council resolution. This will facilitate a broader range of urban design outcomes in the Town Centre.

Council requested further information, including a feasibility analysis that supports the planning amendments sought. Atlas Economics (**Atlas**) was engaged by BHOA to carry out a Feasibility Analysis (**the 2023 Study**) to update the 2018 Study.

Planning Panel Decision and Revised Planning Proposal (2023)

In September 2023 the Sydney South Planning Panel (**the Panel**) determined that an increase in residential density has strategic merit. The Panel resolved to defer its final decision on whether the BHOA PP has site-specific merit, subject to a revised planning proposal from the BHOA that is consistent with the principles of Council's draft Master Plan.

The BHOA has prepared a revised planning proposal (**BHOA Revised PP**) that contemplates revised residential densities on some sites within the Town Centre.

Atlas has been engaged to update the 2023 Study to include commentary on the feasibility of Council's Masterplan principles and the BHOA Revised PP.

1.2 Scope and Approach

To complete the requirements of the brief, the 2023 Study undertook:

- Review of the existing land uses in the Town Centre and its locational context.
- Review of the relevant planning framework including State and local planning legislation and policies.
- Analysis of market trends in the Town Centre including market conditions, price points and development activity.
- Generic feasibility analysis of key sites to understand the minimum density (FSR) controls for feasible development.

All research, analysis and feasibility modelling was undertaken in July 2023. Additional commentary (November 2023) is now provided on Council's Master Plan principles and the BHOA Revised PP.

1.3 Assumptions and Limitations

Atlas acknowledges several assumptions and limitations associated with the 2023 Study.

- At the time of writing, the fallout from the COVID-19 pandemic across the NSW economy is still playing out. The medium to long-term implications for population and employment growth are yet to be fully understood.
- The 2021 Census was administered during the COVID-19 pandemic and at a time of widespread lockdowns across Australia's east coast. Activity recorded at this time may not be accurately representative of employment levels.
- Market research is carried out on a 'desktop' basis without the benefit of site surveys and internal inspections.
- Generic feasibility analysis relies on generic assumptions. Generic feasibility analysis does not have regard to site-specific nuances that detailed feasibility analysis may have.

Notwithstanding the above, all due care, skill and diligence has been applied to the 2023 Study as is reasonably expected.

2. Strategic Context

2.1 Beverly Hills Town Centre

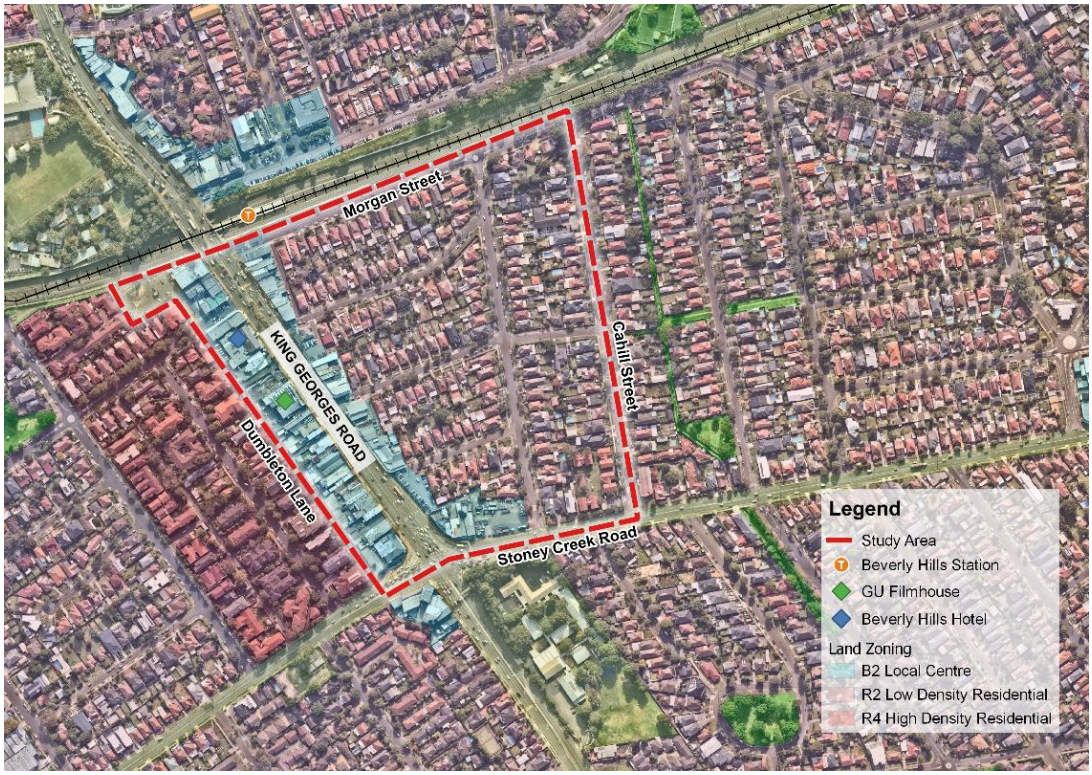
The Town Centre is focused along King Georges Road and is broadly bounded by the Beverly Hills Station to the north, commercial buildings to the west and Stoney Creek Road to the south.

The Town Centre is predominantly zoned E1 Local Centre along King Georges Road, with retail uses mostly comprising restaurants and small-scale commercial services. These businesses are generally accommodated in older style, attached, 1-2 storey commercial and retail buildings. Overall, the Town Centre is characterised by a fine grain built form with small allotments (<300sqm). Larger sites are limited and occupied by key retailers including the Beverly Hills Hotel and boutique cinema GU Filmhouse, situated on the western side of King Georges Road.

The Town Centre is immediately surrounded by residential uses. Whilst this includes a small portion of R4 High Density Residential land zoning to its west, residential uses in the broader locality are mostly subject to R2 Low Density land zoning. Accordingly, residential typologies are largely represented by low density, separate houses surrounding the Town Centre. Of the limited unit developments in the locality, most reflect older style residential flat buildings and few boutique-style, modern apartments on the western side of King Georges Road.

Particularly, the 2023 Study focuses on the Town Centre within King Georges Road and surrounding residential uses to its east (the Study Area). **Figure 2-1** defines the geographical boundaries of the Study Area set out in Council's draft Master Plan for Beverly Hills.

Figure 2-1: Study Area



Source: Atlas

2.2 Planning Framework

2.2.1 Greater Sydney Region Plan (2018)

The Greater Sydney Region Plan (**the Region Plan**) is the principal strategic planning framework for the Greater Sydney region. The Region Plan seeks to accommodate the needs of Sydney's growing population into a metropolis of three cities:

Western Parkland City, Central River City and Eastern Harbour City, building on a vision where most residents live within 30 minutes of their jobs, education and health facilities.

The Region Plan sets out objectives specified in the 10 Directions to enable liveability, productivity and sustainability in Greater Sydney. This includes 'Objective 10: Greater Housing Supply' which prioritises dwelling growth in proximity to transport infrastructure and strategic centres.

The Region Plan delineates Greater Sydney into five districts: Western City, Central City, Eastern City, Northern District and the Southern District. The Study Area falls within the boundaries of the Southern District.

2.2.2 South District Plan (2018)

The South District Plan (**the District Plan**) encompasses the Canterbury-Bankstown, Georges River and Sutherland LGAs. It sets out a 20-year plan to manage economic, social and environmental growth in these LGAs. In doing so, the District Plan supports the implementation of the Region Plan.

The District Plan assists councils to align their local planning strategies to place-based outcomes, through a set of planning priorities and actions. The planning priorities and actions align with the 10 Directions of the Region Plan and their corresponding objectives. This includes Planning Priority s5 which specifies that the delivery of new housing should be in coordination with local infrastructure to create liveable, walkable, cycle-friendly neighbourhoods with access to retail, services and public transport.

2.2.3 Georges River Employment Lands Strategy (2017)

The Georges River Employment Lands Strategy (**the Strategy**) seeks to guide development within employment centres. The Strategy also makes recommendations for new planning controls in line with dwelling and employment targets.

Particularly, it recommends that the Beverly Hills Town Centre retain its B2 Local Centre zoning (now classified as E1 Local Centre), however, identifies an opportunity for increased density controls and building height limits to leverage existing rail infrastructure and facilitate redevelopment of older-style commercial properties.

2.2.4 Georges River Development Control Plan (GRDCP) (2021)

The GRDCP came into effect in 2021 in conjunction with the Georges River Local Environmental Plan (LEP). The GRDCP supports the provisions of the Georges River LEP by providing objectives and development controls to guide and enhance development within the LGA.

The Beverly Hills Town Centre is specified in the GRDCP in 'Part 7 Business Precincts' which guides general commercial controls of business zoned land in the LGA. This includes the specification of appropriate built form, design and amenity. Particularly, the provisions indicate that future development in the Beverly Hills Town Centre should result in a high quality commercial and retail centre that cater to the needs of the local community and visitors. It should also facilitate an improved mix of land uses, leverage existing public transport infrastructure and enhance pedestrian amenity.

The GRDCP sets out planning controls for new developments in the Beverly Hills Town Centre. This includes mandated ground floor retail/commercial uses for street-facing buildings, maximum building height of 15m and FSR 2:1.

2.2.5 Draft Beverly Hills Master Plan (2020)

The draft Beverly Hills Master Plan (**BHMP**) was prepared by Council over a two-phase process commencing 2018 and was subsequently released for public exhibition in 2020. It identifies key strengths, opportunities, challenges and needs of the Beverly Hills Town Centre, to enhance the centre and its immediate surroundings.

The draft BHMP identifies areas for potential rezoning and planning control amendments that facilitate urban renewal and revitalisation in the Town Centre. It recommends the consolidation of key sites along King Georges Road which enable an appropriate site area and configuration to deliver outcomes consistent with the BHMP and the Region Plan.

The draft BHMP proposes various development standards within the Town Centre, including building height limits of 21m to 28m and FSR 3:1 for mid-block and corner sites respectively. It also proposes incentives including bonus height limits (additional 3.1m) and FSR (up to 0.5:1).

In April 2023, Council resolved to not proceed with the exhibited BHMP, identifying new principles to be endorsed. This includes the expansion of the business zone on the eastern side of King Georges Road and the potential for increased building height limits on the western side of King Georges Road.

Endorsed Master Plan Principles and Elements

Council endorsed the following principles to guide preparation of the Master Plan.

- The Master Plan guides future development on both sides of King Georges Road.
- The expansion of the business zone on the eastern side of King Georges Road to create opportunities for the growth of the Local Centre to support the local community.
- The exploration of the western side of King Georges Road having greater maximum building heights than the eastern side of the road.
- The investigation of the inclusion of affordable housing within the Local Centre.
- That built form transition provisions between the business zone and adjoining low scale residential zones are incorporated into the Master Plan and future development controls.
- That non-residential floor space within future developments ensures capacity to meet the 2036 projections for employment floor space.
- That the Master Plan addresses the risk associated with the Moomba to Sydney High Pressure Gas Pipeline on future development
- The provision of a plaza and additional green spaces within the Local Centre.

Council additionally endorsed various elements to guide the development of the Master Plan. Those relevant to the feasibility analysis include:

- Eastern side of King Georges Road:
    - Maximum building heights 21m (base height) and 28m (gateway sites).
    - Maximum FSR 2.5:1 (base FSR) to 3:1 (gateway sites).
- Western side of King Georges Road:
    - Maximum building heights 21m (base height) and 24.1m (sites requiring 3m road widering and 20m frontage), 31.4m (gateway sites) and 27.2m (cinema site).
    - Maximum FSR 3:1 (base FSR), 3.5:1 (sites requiring 3m road widening and min 20m frontage and gateway sites) and 4:1 (cinema site).
- Non-residential FSR 0.75:1.

A revised draft Master Plan is underway to include these principles identified in the Council resolution, with public exhibition expected to occur in early 2024.

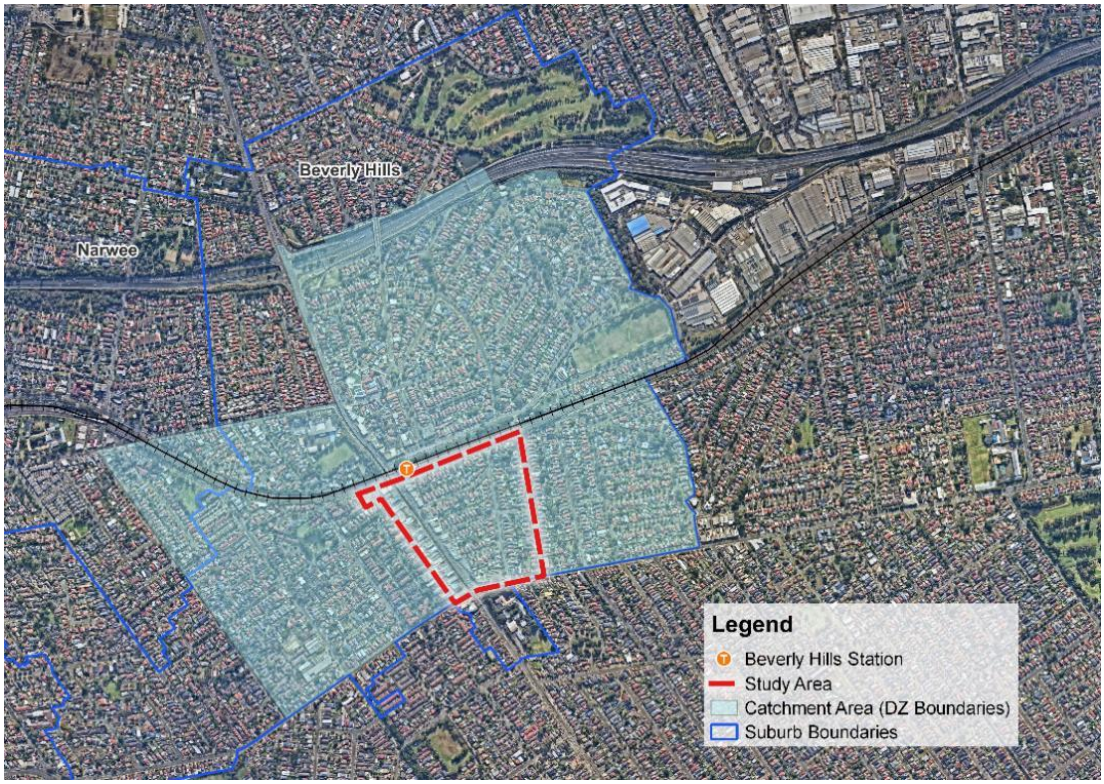
2.3 Employment Profile

To understand the strategic context and role of the Town Centre, this section examines the nature of employment and economic activity in the locality.

In order to analyse employment, a series of Destination Zone (DZ) geographies were selected which broadly align with the boundaries of the Town Centre and surrounds. These DZ geographies are referred to as the 'Catchment Area'.

Figure 2-2 illustrates the boundaries of the Catchment Area and its locational context.

Figure 2-2: The Catchment Area



2.3.1 Industry Classifications

The ABS categorises employment activity into 19 industry sectors referred to as ANZSICs (Australian New Zealand Standard Industry Classification). These are the most commonly utilised categorises used when analysing an areas employment profile.

It can useful to consider employment composition in broader industry terms. Broad industry classifications (BIC) group the 19 ANZSIC sectors into four main industry categories - population-serving, knowledge-intensive, health and education and industrial.

These BIC groupings and their corresponding ANZSIC are shown in **Table 2-1**.

Table 2-1: Broad Industry Classification by 19-Digit ANZSIC

Population Serving	Knowledge-Intensive	Health and Education	Industrial
• Construction • Retail Trade • Accommodation & Food Services • Arts & Recreation Services • Other Services	• Information, Media & Telecommunications • Financial & Insurance Services • Rental, Hiring & Real Estate Services • Professional, Scientific & Technical Services • Administrative & Support Services • Public Administration & Safety	• Education & Training • Health Care & Social Assistance	• Agriculture, Forestry & Fishing • Mining • Manufacturing • Electricity, Gas, Water & Waste Services • Wholesale Trade • Transport, Postal & Warehousing

Source: ABS/Atlas

2.3.2 Employment by Industry

In 2011, there were some 1,000 workers employed in the Catchment Area. This grew to 1,235 workers in 2016, subsequently falling to 1,070 workers in 2021. This reflects nominal employment growth averaged at 0.7% per annum over the 2011-2021 period, represented by 70 additional workers. It is acknowledged that on census night, most regions in Sydney including the Town Centre were under mandatory stay-at-home orders and many businesses had been shut.

The employment profile of the Catchment Area has also evolved.

- In 2011, population serving and health and education industries were key drivers of employment, representing 34% (~340) of jobs each. This was followed by the 21% of knowledge-intensive industries (~210 jobs).
- In 2021, whilst health and education industries remained dominant at 31% (~330 jobs), population serving industries fell in representation (from 34% in 2011 to 28% in 2021). This is attributed to the growth in knowledge-intensive industries (21% in 2011 to 29% in 2021) – driven by professional, scientific and technical services (85 jobs in 2011 to 131 jobs in 2021).

Overall, the industry mix in the Catchment Area reflects a largely balanced and diversified employment profile, almost equally comprised of population serving, knowledge-intensive and health and education industries (~30%).

Table 2-2 illustrates the employment profile of the Catchment Area over the 2011-2021 period.

Table 2-2: Employment by Industry, Catchment Area (2011-2021)

Industry (ANZSIC)	2011		2016		2021		Change (2011-21)	
	No.	%	No.	%	No.	%	No.	%
Agriculture, Forestry and Fishing	-	0%	3	0%	-	0%	0	0%
Mining	-	0%	-	0%	-	0%	0	0%
Manufacturing	39	4%	43	3%	35	3%	-4	-1%
Electricity, Gas, Water and Waste Services	-	0%	-	0%	4	0%	4	0%
Construction	92	9%	113	9%	84	8%	-8	-1%
Wholesale Trade	41	4%	19	2%	11	1%	-30	-3%
Retail Trade	67	7%	70	6%	54	5%	-13	-2%
Accommodation and Food Services	126	13%	202	16%	111	10%	-15	-2%
Transport, Postal and Warehousing	10	1%	25	2%	27	3%	17	2%
Information Media and Telecommunications	17	2%	27	2%	16	1%	-1	0%
Financial and Insurance Services	26	3%	15	1%	27	3%	1	0%
Rental, Hiring and Real Estate Services	44	4%	72	6%	83	8%	39	3%
Professional, Scientific and Technical Services	85	8%	120	10%	131	12%	46	4%
Administrative and Support Services	20	2%	27	2%	22	2%	2	0%
Public Administration and Safety	20	2%	28	2%	28	3%	8	1%
Education and Training	191	19%	193	16%	176	16%	-15	-3%
Health Care and Social Assistance	152	15%	159	13%	151	14%	-1	-1%
Arts and Recreation Services	18	2%	23	2%	12	1%	-6	-1%
Other Services	42	4%	43	3%	42	4%	0	0%
Inadequately Described / Not Stated	12	1%	53	4%	58	5%	46	4%
Total	**1,002**	**100%**	**1,235**	**100%**	**1,072**	**100%**	**70**	
Broad Industry Classification (BIC)								
Population Serving	345	34%	451	37%	303	28%	-42	-6%
Knowledge-Intensive	212	21%	289	23%	307	29%	95	7%
Health and Education	343	34%	352	29%	327	31%	-16	-4%
Industrial	90	9%	90	7%	77	7%	-13	-2%
Total	**1,002**	**100%**	**1,235**	**100%**	**1,072**	**100%**	**70**	**0%**

Source: ABS (2021)

3. Market Appraisal

Research and analysis in this chapter was undertaken in July 2023.

3.1 General Market Conditions

The Australian economy has been facing a heightened level of uncertainty over the past 12-24-months. Global upstream cost pressures resulting from the war in the Ukraine, pent-up COVID-related domestic demand and a resurgence in migration-driven population growth have resulted in a significant uptick in broad based inflation across the domestic economy. The labour market is tight and has contributed to wages growth amidst this inflationary backdrop.

In response, the Reserve Bank of Australia (RBA) has been tightening monetary policy with successive cash rate increases from 0.1% in April 2022 to 4.1% in June 2023. More rate rises are expected in the short-term as the RBA seeks to return inflation (currently pegged at 7.0%) to its target range of 2%-3%. Rapid increases to interest rates have begun to affect many parts of the economy - notable declines in investment activity, household consumption and residential property values.

Against this backdrop, the property and development sector has been impacted to varying degrees over the past few years:

- Substantial rises in building costs over 2021-2022, resulting in an increase in development delays and deferrals.
- New unit approvals have been declining since Q1 2021 and are now approaching levels observed in March 2012.
- Despite a softening in pricing, demand for housing remains strong given an uptick in population growth. This is most evident in the rental market, with a chronic undersupply of rental properties driving historically low vacancy rates.
- Structural change in working arrangements have driven a sustained level of commercial office vacancy across Greater Sydney with many commercial developers stalling or repositioning new office developments.
- Demand for industrial land is at historic highs given multiple structural tailwinds, with a chronic shortage of industrial land resulting further increasing property values and rents.

Accordingly, the influence of current economic conditions on property markets is nuanced. Trends resulting from the COVID-19 pandemic have 're-set' structural demand for some sectors, notably commercial office, retail and industrial.

3.2 Residential Market Appraisal

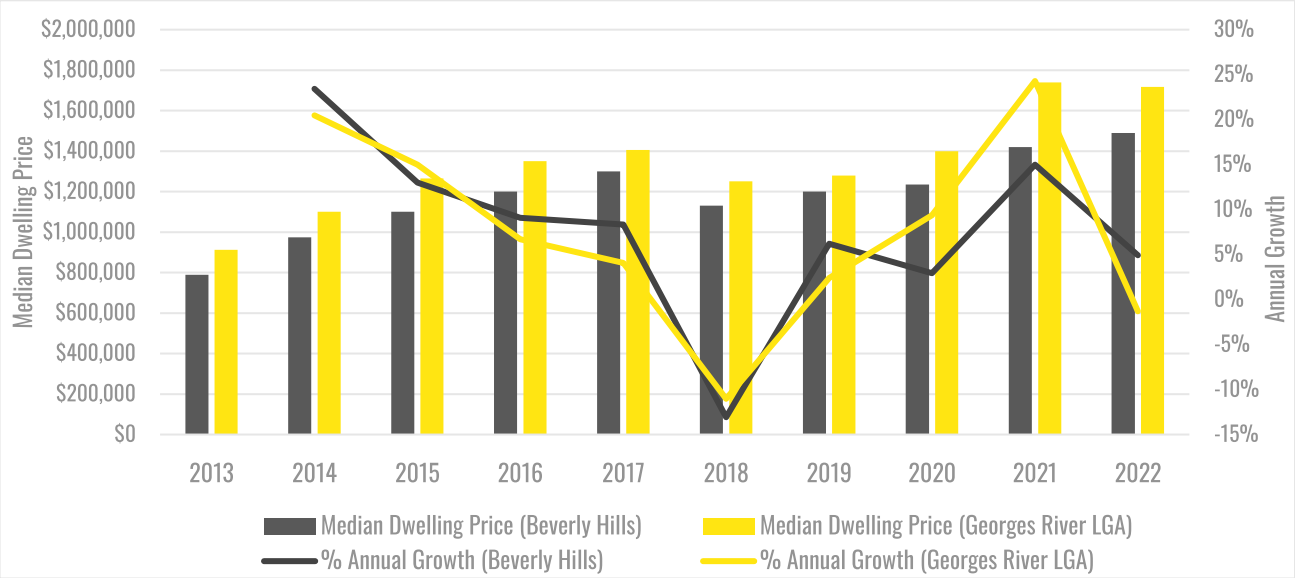
Dwelling prices in Beverly Hills have risen significantly in the last decade. In 2013, the median dwelling price in Beverly Hills was $788,750, rising by 89% to reach $1,490,000 in 2022. This follows a period of marked growth over 2020-2021, where the median dwelling price rose by a notable 15%.

The historical price trends in Beverly Hills reflect broader trends observed across the Georges River LGA and Greater Sydney, where record low interest rates during the COVID-19 pandemic stimulated significant growth in the housing market.

Overall, dwelling prices in Beverly Hills are generally lower than those in the LGA. In 2022, the median dwelling price recorded in the Georges River LGA was $1,717,500, approximately 15% higher than that of Beverly Hills.

Figure 3-1 illustrates dwelling price trends in Beverly Hills and Georges River LGA over the 2011-2021 period.

Figure 3-1: Median Dwelling Prices (2013-2022), Beverly Hills and Georges River LGA



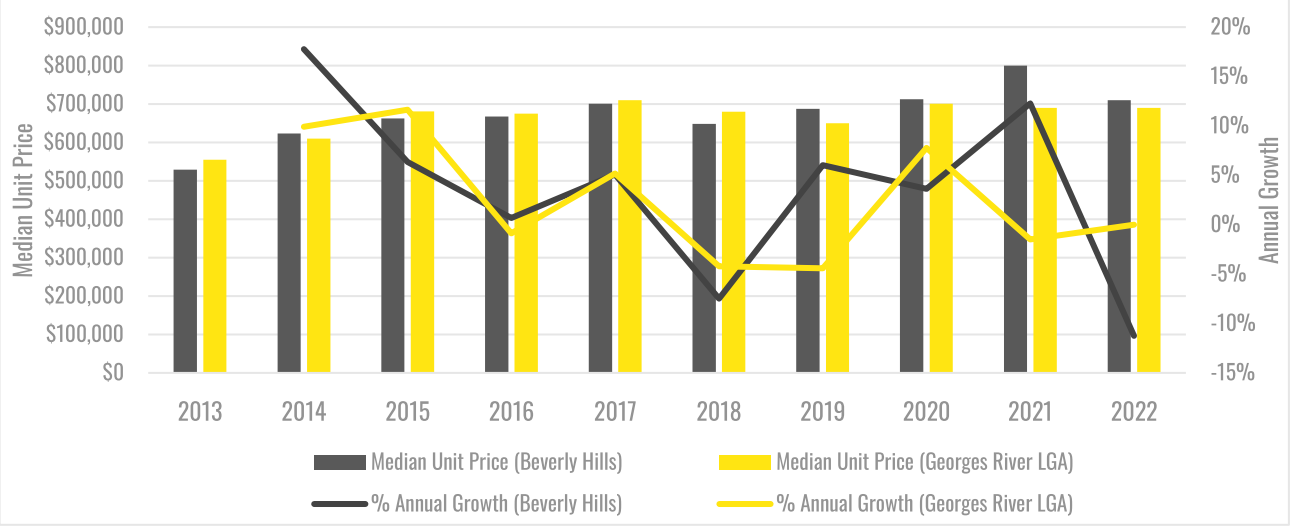
Source: PriceFinder (2023)

Residential unit price trends in Beverly Hills are broadly aligned with the dwelling market, including record growth observed over the 2020-2021 period. Whilst the residential unit market in Beverly Hills has experienced more modest growth compared to dwellings, prices have also risen significantly in the last decade.

In 2013, the median unit price in Beverly Hills was $529,000, approximately 5% lower than that of the Georges River LGA ($555,000). In 2022, the median unit price in Beverly Hills grew to $710,000, reflecting an overall price growth of 34%. Comparatively, the Georges River LGA recorded a lower median unit price of $690,000 in 2022. This demonstrates that the unit market in Beverly Hills has grown significantly and outpaced that of the broader LGA.

Figure 3-2 illustrates unit price trends in Beverly Hills and Georges River LGA over the 2011-2021 period.

Figure 3-2: Median Unit Prices (2013-2022), Beverly Hills and Georges River LGA



Source: PriceFinder (2023)

The high interest rate environment has affected prospective home buyers, variable mortgage payments and broader residential construction activity through increased cost of finance. This has led to a general slowdown in the residential market, with declining housing values observed in capital cities including Sydney - following a period of significant price growth during the pandemic. Rental prices, however, are strengthening rapidly, with record low vacancy rates observed across Australia.

The outlook for the Australian economy is generally optimistic however the economy will continue facing headwinds resulting from supply chain disruptions and inflationary pressures in the short term.

3.3 Retail Market Appraisal

The composition of existing retailers in the Beverly Hills Town Centre reflects its role as a community focused neighbourhood centre. In 2020, the Town Centre comprised some 3,500sqm of retail floorspace (Draft BHMP, 2020). Retail activity is predominantly represented by restaurants and cafes. In comparison, non-food related retailers are limited to few commercial services such as real estate agencies and professional services.

The retail market is evolving towards experience and convenience, with the rise in large-format shopping centres offering a 'one stop shop' experience, accommodating a broad range of retail, services and amenity. These are typically reflected in regional centres which support the higher order needs of residents.

Notwithstanding, local centres continue to play an important role in meeting convenience-based needs of residents and supporting local employment opportunities. Local centres in metropolitan Sydney, however, increasingly face constraints including parking, accessibility and loss of retail/commercial floorspace due to residential conversions. This includes the Beverly Hills Town Centre.

Particularly, the Beverly Hills Town Centre is focused along King Georges Road, a six-lane major thoroughfare subject to noise and traffic congestion. This has led to a gradual reduction in foot traffic along the main street. Furthermore, the lack of street parking detracts from the Town Centre's accessibility and overall attractiveness to businesses and consumers.

Overall, the Town Centre comprises an established dining and leisure precinct with a range of food and beverage retailers emerging in recent years. These retailers are supported by anchor occupiers including the cinema GU Filmhouse (447-457 King Georges Road) and the Beverly Hills Hotel (427 King Georges Road) which contribute to a vibrant night-time economy.

Whilst the Town Centre has the challenges of a busy arterial road, it also benefits from its accessibility to public transport infrastructure and its established dining scene. This presents an opportunity to deliver additional land uses including more diverse retail offerings, to leverage its existing position and further strengthen local economic activity.

3.4 Recent Sales Activity

The Study Area comprises a mix of retail and commercial buildings within the main retail strip along King Georges Road, as well as low density housing beyond. To assess existing use values in the Study Area, this section analyses recent sales of residential dwellings and retail strip buildings in Beverly Hills and surrounding centres. These existing use values will inform feasibility assumptions in the next chapter.

Residential Dwelling Sales

Numerous residential dwellings have transacted in proximity to the Beverly Hills Town Centre. This includes dwellings situated east of the Town Centre, within the R2 Low Density Residential land zone.

Table 3-1 provides a sample of dwelling sales in the R2 low density zoned portion of the Study Area.

Table 3-1: Sales Evidence, Single Dwellings (Study Area)

Address	Sale Price	Sale Date	Site Area (sqm)	$/sqm improved site	Comments
5 Lee Avenue	$1,735,000	Feb-23	588	$2,951	Situated 250m east of Town Centre. Single storey, brick dwelling. Presents in updated condition, with 4 bedrooms, 2 bathrooms and single detached garage.
91 Morgan Street	$1,410,000	Oct-22	613	$2,300	Approx. 900m east of Beverly Hills Station. Original dwelling, indicative of land value.
33 Cahill Street	$1,860,000	Jun-22	658	$2,827	Situated 550m east of Town Centre. Single storey, brick dwelling. Renovated to a good, modern standard throughout. Provides 3 bedrooms and 2 bathrooms. Dated sale.
22 Cahill Street	$1,515,000	Oct-22	626	$2,420	Situated 400m east of Town Centre. Single storey, brick dwelling. Presents in dated condition with basic internal finishes.

Source: PriceFinder (2023)

Overall, residential dwellings in the Study Area are predominantly older style, detached separate houses situated upon allotment sizes of 550sqm to 650sqm. As observed in **Table 3-1**, these dwellings typically transact between $2,400/sqm to $3,000/sqm of improved site, with the upper range reflecting those which present to an updated, modern standard.

Retail Strip Sales

Several retail properties have transacted in the Beverly Hills Town Centre in the last 12-24 months, many of which sold with passing rents or marketed as having development potential. This suggests that active buyers in the Town Centre include investors who are observed to be acquiring commercial properties for potential redevelopment opportunities.

Table 3-2 provides a sample of retail strip sales in the Study Area and surrounding centres in the LGA.

Table 3-2: Retail Sales Activity, Study Area and Surrounding Local Centres

Address	Zone	Sale Price (Sale Date)	Floor Area (site area)	$/sqm floor area	$/sqm improved site area	Passing yield
484 King Georges Rd Beverly Hills	B2	$1,550,000 (8/22)	200sqm (195sqm)	$7,750	$7,949	3.6%
Situated in the Town Centre, 100m south of the train station. Two storey shop top sold with passing rent of $55,592 per annum. Occupied by massage parlour. Advertised as having potential for alteration/extension.						
457 King Georges Rd Beverly Hills	B2	$1,828,000 (9/21)	390sqm (284sqm)	$4,687	$6,437	4.3%
Situated in the Town Centre, approx. 290m from the train station. Operating as a cafe with upper floor residence. Basic fit-out, presents neatly. Advertised as having development potential.						
482 King Georges Rd Beverly Hills	B2	$2,060,000 (5/21)	360sqm (198sqm)	$5,722	$10,404	3.9%
Corner commercial building, situated at the intersection of King Georges Rd and Morgan St within the Town Centre. Approx. 30m south of the train station. Multi-tenanted, sold with passing rent of $80,400 per annum.						
471-475 King Georges Rd Beverly Hills	B2	$5,720,000 (5/21)	850sqm (835sqm)	$6,729	$6,850	-
Large, two storey retail building within Town Centre, 350m south of train station. Original, tired condition. Sold with DA for 2 storey restaurant. Purchased by owner-occupier.						
2 Woodville St Hurstville	B4	$6,000,000 (10/22)	1,080sqm (656sqm)	$5,556	$9,146	1.2%
Low rise, 3 level commercial building in the Hurstville Town Centre. Sold partially leased returning $72,631 per annum with 2-level vacancy (potentially returning additional $312,900 per annum). Sale price reflects 6% yield if fully leased.						

Source: Realcommercial/PriceFinder

As observed in **Table 3-2**, limited sales have occurred in the Town Centre in the last 12 months, indicating that retail properties in the main shopping strip are tightly held. Sale prices are also broadly aligned with surrounding centres including Riverwood. Based on the recent sales activity, retail properties in the Town Centres typically achieve price points ranging $4,700/sqm to $7,750/sqm of floor area or $6,400/sqm to $10,400/sqm of improved site area.

The range of sale prices reflects the varying site and floor areas of the analysed sales. Most retail properties in the Town Centre are situated on small allotments (<300sqm), reflecting its fine grain nature. It is an accepted rule of thumb, that all things being equal, a small property is worth more on a rate per square metre. Accordingly, small fine grain properties in the Town Centre are expected to sell for in the upper end of the $6,900/sqm to $10,400/sqm range.

Development Site Sales

Very limited development site sales activity has been observed in Beverly Hills over the past 6-12 months – a reflection of soft economic conditions with developers remaining cautious over this period. To enable insight into the prices paid for development opportunities within Beverly Hills, development site sales deemed most relevant have been analysed whilst accounting for varying market conditions, lot sizes and other pricing determinants. These are detailed in **Table 3-3**.

Table 3-3: Development Site Sales, Study Area and Surrounds

Address	Site Area (Zone)	FSR (GFA)	Sale Price (Sale Date)	$/sqm GFA	Comments
309 Princes Hwy Carlton	562sqm (B2)	2.5:1 (1,405sqm)	$1,900,000 (12/22)	$1,352	Situated in the southeastern end of the LGA, 6km from the Study Area. Main road location, 1km south of the Carlton Station within retail shopping strip. Sold without DA. Superior locality, more established with better urban/ retail amenity and transport accessibility.
41 Broadarrow Rd Narwee	1,696sqm (B2)	3.8:1 (6,424sqm)	$8,200,000 (8/22)	$1,276	Occupied by AMPOL service station, mechanics workshop and residence. DA **approved development site for 61 residential apartments** and retail floorspace. Approved GFA of 6,424sqm. Sold with holding income. Situated adjacent to Narwee Town Centre and opposite train station.
1258-1260 Canterbury Rd Roselands	446sqm (B2)	-	$1,705,000 (5/22)	-	Mortgagee in possession sale. Approx. 1km from Roselands Shopping Centre and Punchbowl Station. Sold with **DA for 14 residential units. I**mproved with 2 existing shop tops.
280-300 Lakemba St Wiley Park	5,868sqm (B2)	2.3:1 (13,566sqm)	$15,000,00 For sale	$1,106	'Wiley Park Plaza', situated at the corner of Lakemba St and King Georges Rd. **DA approved for 142 apartments/ 13,566sqm GFA.** Situated 350m north of the Wiley Park Station. On the market for 23 days.
1-3 English St Kogarah	991sqm (R4)	2:1 (1,982sqm)	$2,500,000 For sale	$1,261	Situated 300m from Carlton Station and 750m from Kogarah Town Centre. Improved with 2 residential flat buildings. Marketed to developers and investors, with holding income. Agent notes potential development for 20-22 apartments. Offers have been received circa $2.5m.

Source: Realcommercial/PriceFinder

The 2023 Study has considered site sales which have transacted in areas permitted higher density development (i.e. B2 zones). These often reflect town centre localities and their surrounds, which enable insight into development site values in the Study Area. Overall, the sales analysis indicates price points ranging $1,100/sqm to $1,400/sqm potential GFA for sites with development potential. The upper price range includes the site sale observed in Carlton, which is considered a superior location to the Town Centre due to its higher level of amenity and accessibility.

We consider a site value of $1,100/sqm to $1,200/sqm potential GFA to be applicable to the Town Centre.

Some of the sites are observed to have the benefit of development consent. With current development activity constrained by inflationary construction costs, development consent is particularly valuable, saving time and cost associated with the planning approval process.

New Apartments

A review of new units being marketed 'off the plan' in Beverly Hills revealed a lack of new apartment developments being progressed in the locality. Few apartment developments have been delivered to the western side of King Georges Road in the last decade, mainly scall-scale, low rise buildings. To understand the potential price points of new apartments in the Study Area, recent sales within surrounding localities were analysed. Few of these 'off the plan' projects are detailed in turn.

Table 3-4: Select New Apartment Pricing, Surrounding Localities

Address	Sale Price Range	$/sqm NSA	Comments
The Rise, 206-214 Railway Pde Kogarah			Circa 13 level development situated 500m east of Carlton Station, 650m west of Kogarah Station and 6km southeast of the Town Centre.
1b	$640,000-$680,000	Average $10,800-$12,600	The project will deliver 47 units in a mix of 1, 2 and 3 bedrooms, and feature harbour and city views. Estimated completion late 2024.
2b	$810,000-$950,000		
3b	$1,250,000-$1,325,000		
54-56 Graham Rd Narwee			Boutique 3-level development set to deliver 20 apartments in a mix of 1, 2 and 3 bedrooms.
1b	$595,000-$620,000	Average $8,400-$11,700	Situated 750m northwest of the Narwee Station and 2km northwest of the Town Centre. Completion expected to occur late 2024.
2b	$665,000-$730,000		
3b	From $780,000		

Source: realestate.com.au

In the surrounding areas of Beverly Hills, majority of new apartments marketed 'off the plan' are situated within the Kogarah Town Centre, some 6km southeast of the Study Area. The Kogarah Town Centre benefits from its established public transport infrastructure, diverse mix of retail offerings and commercial services including anchor supermarket Woolworths. New apartments are therefore priced above the range of other localities including Narwee and Roselands.

Table 3-5 provides a sample of modern 1, 2 and 3-bedroom apartment sales in Beverly Hills.

Table 3-5: Established Apartment Sales, Beverly Hills

Unit Type	Address	Building Level	Internal Area (sqm)	Sale Price ($)	Sale Date	Sale Price ($/sqm)
1b	2/442-444 King Georges Rd	Ground	60	$420,000	Feb 2022	$7,000
2b	8/2-4 Hampden St	2	78	$638,000	Aug 2022	$8,180
	5/36-44 Tooronga Tce	Ground	80	$640,000	Sep 2022	$8,000
3b	5/2-4 Hampden St	Ground	85	$777,000	Jan 2023	$9,140
	9/10-12 Hampden St	1	118	$870,000	Feb 2023	$7,370

Source: Realestate.com.au/PriceFinder

Overall, there are very limited modern apartments in Beverly Hills, most of which are within boutique, 2 to 3 storey developments. Due to low building levels, apartment pricing generally varies based on the age/ quality of development, floorplan and size, as opposed to aspect/views offered.

We expect new apartments in the Study Area to achieve rates of between $9,000/sqm and $10,000/sqm of internal area.

3.5 Development Pipeline

A review of proposed developments in the pipeline indicates that there are very limited projects being progressed in Beverly Hills. Only two projects have been identified in the pipeline in Beverly Hills - comprised of a boarding house and affordable housing development outside the Town Centre. In the broader LGA, a mix of apartment and townhouse developments are proposed in various suburbs.

Most apartment developments are being proposed in **Hurstville**, situated some 3km southeast of the Study Area. Hurstville comprises an established local centre which benefits from access to train services and diverse land uses. This is aligned with its existing planning controls, comprising a mix of B2 Local Centre, B3 Commercial Core, B4 Mixed Use and R4 High Density Residential land zoning in and around its town centre.

Collectively, 13 apartment developments are being progressed in Hurstville, which could deliver up to **1,965 units** over the coming 12 to 24 months if delivered in entirety. Other localities where several apartment developments are in various planning stages include:

- **Blakehurst:** 7 projects totalling up to 235 units.
- **Beverly Park**: 5 projects totalling up to 160 units.
- **Carlton**: 5 projects totalling up to 194 units.

These proposed units will be predominantly accommodated within medium rise developments with building levels up to 7 storeys. Developments in Hurstville, however, are of higher density built forms with building levels rising to 20 storeys.

3.6 Summary of Key Findings

Findings from the market analysis enable an understanding of:

- Prices that could potentially be achieved for new apartments in the Study Area.
- Market willingness to pay for development sites in the Study Area.
- Existing use values of property types in the Study Area including retail/commercial buildings in the Town Centre and single dwellings beyond.

Residential Uses

Dwelling prices in Beverly Hills have risen significantly at an average annual rate of 7% in the last decade, particularly over 2020-2021. This is aligned with trends observed in Greater Sydney. Unit prices in Beverly Hills have also risen notably at an average annual rate of 3% over the 2013-2022 period. This is slightly higher than the 2% observed in the broader LGA.

Housing typologies in Beverly Hills are mostly represented by low density, separate houses, with few unit developments focused on the western side of the Town Centre. This reflects existing planning controls, with higher density residential developments restricted to small portion of R4 High Density Residential west of King Georges Road amongst R2 Low Density Residential land zoning elsewhere.

The development pipeline indicates that there are no notable apartment developments being planned in Beverly Hills. In the broader LGA, new apartments will be predominantly delivered to Hurstville, accommodated within high density developments of up to 20 storeys.

New apartments being marketed 'off the plan' in Narwee and Kogarah indicate price levels ranging $8,400/sqm to $12,550/sqm of internal areas, with the upper value range representing prices achieved in Kogarah. In Beverly Hills, modern apartments typically achieve prices ranging $7,000/sqm to $9,150/sqm, depending on unit size and building age. New apartments in the Town Centre are therefore expected to achieve prices in the mid to high $9,000/sqm and up to $10,000/sqm of internal area.

Development Site Sales

Limited site sales have transacted in Beverly Hills in the last 6-12 months, indicating soft development activity. This is similarly observed in surrounding localities within the LGA and reflects soft economic conditions with developers remaining cautious over this period.

Analysis of most relevant site sales indicate a price range of $1,100/sqm to $2,510/sqm of GFA, with a premium paid for development consent. The sale at **41 Broadarrow Road, Narwee** at $1,280/sqm of GFA, or $134,400 per unit/site, is considered most comparable to sites within the Study Area. Based on comparable sales, sites in the Study Area are expected to achieve a rate of $1,100/sqm to $1,200/sqm of GFA.

Retail Uses

The Town Centre comprises an established food and entertainment precinct, anchored by the cinema and predominantly occupied by restaurants along King Georges Road. Few retail properties in the Town Centre have transacted in the last 6-12 months, indicating its tightly held nature, with some landowners aware of potential future development opportunities.

Market evidence indicates commercial and retail uses in the Town Centre generally range from $6,900/sqm to $10,400/sqm of improved site area, depending on, *inter alia*, position, size, existing tenancies and building condition.

The observations of this chapter are drawn together to form key considerations for feasibility analysis of select sites within the Study Area. This is examined in the following chapter.

4. Feasibility Analysis

4.1 Objectives of Feasibility Analysis

This section undertakes feasibility analysis on a sample of selected sites in the Study Area to understand if:

- If Council's Master Plan FSRs are feasible for development.
- If development is not feasible, solve for the required FSRs for feasible development.

The overarching objective of the feasibility analysis is to identify the minimum FSR required for a feasible mixed use development on the selected sites.

The chapter concludes with an analysis and commentary on Council's endorsed principles and guiding elements for the Master Plan. It additionally reviews the BHOA Revised PP and comments on its feasibility and redevelopment prospects.

Methodology

The financial feasibility analysis relies on Direct Comparison as the primary method.

The Direct Comparison method involves assessing the existing use values of the sites (also referred to as the Cost of Land) which is then divided by a site value rate (obtained from the analysis of development site sales in **Table 3-3**). This arrives at the minimum GFA (and FSR) required on each site for development to be feasible.

There are three key steps in the feasibility analysis:

- **Step 1:** Assess the value of each site with existing improvements (i.e. existing use value). This is the assumed cost of land for each site.
- **Step 2:** Solve for the minimum GFA that would yield a site value at least equal to the assumed cost of land in Step 1.
- **Step 3:** Divide the minimum GFA by the site area for the equivalent FSR required.

There are a number of new fees and charges recently introduced by the NSW Government in 2023.

- The Housing and Productivity contributions (HPC) would begin to be phased-in from 1 October 2023. The following rates are applicable:
    - $10,000 per residential unit
    - $30/sqm commercial/ retail GFA.
- Sydney Water has publicly exhibited draft water infrastructure charges (drinking water and wastewater) which is proposed to be phased-in over several years. A charge of $2,060/ET will apply to the Town Centre.

The sales of development sites analysed in **Table 3-3** would not have accounted for these additional charges and if reflected, could conceivably have resulted in lower sale prices.

Assumed Cost of Land

The analysis of sale prices in **Table 3-2** reflects a range of $6,900/sqm to $10,400/sqm of overall improved site area. The following rates are applied to component properties within each site.

- Large 2 storey buildings (>800sqm site area) - $6,800/sqm to $6,900/sqm of overall improved site area.
- Large 1 storey buildings (>1,500sqm site area) - $6,000/sqm of overall improved site area.
- Smaller 2 storey buildings (150-200sqm site area) - $8,000/sqm to $9,000/sqm of overall improved site area.
- Single dwelling (500sqm site area) - $3,000/sqm of overall improved site area (drawn from sales analysis in **Table 3-1**).

The calculations of the cost of land for each property are shown in SCHEDULE 1.

Analysed Development Site Values

The analysis of mixed use development sites in **Table 3-3** indicates a range of $1,100/sqm to $2,510/sqm of GFA, with a premium paid for development consent. The sale at **41 Broadarrow Road, Narwee** at $1,280/sqm of GFA, or $134,400 per unit/site, is considered most comparable to sites within the Study Area. This site however, had the benefit of development consent and sold in August 2022 prior to the recently announced fees and charges.

Accordingly, sites in the Study Area are expected to achieve a rate of $1,100/sqm to $1,200/sqm of GFA, with emphasis placed at the lower end of the range.

4.2 Selected Sites

Working with the BHOA, several potential development sites are selected and notional development yields formulated for the purposes of feasibility analysis. The cost to purchase individual properties within the development site is estimated from research into property markets and sales activity.

Figure 4-1: Selected Sites

Source: Atlas

Existing-use Values

In the first step, overall improved site value rates are adopted based on the analysis of commercial sales in **Table 3-2**. The property at 471-475 King Georges Road was sold for $5.72 million in 2021 ($6,900/sqm improved site area) and represents the most recent and relevant sale for the purposes of ascribing existing use values to the selected sites.

Table 4-1 lists the sites selected, their masterplan FSRs and proposed FSRs in the Planning Proposal.

Table 4-1: Existing use Values, Selected Sites

Site	Properties	Site Area (sqm)	Zone	Assumed Cost of Land	Current FSR (LEP)	Council Master Plan FSR	Initial Planning Proposal FSR	Revised Planning Proposal FSR
1	407-421 King Georges Rd	2,148	E1	$13,605,300	2.0:1	3.0:1	5.5:1	5.0:1
2	437-441 King Georges Rd	903	E1	$6,140,000	2.0:1	3.0:1	5.5:1	3.0:1
3	471-475 King Georges Rd	835	E1	$5,761,500	2.0:1	3.0:1	4.0:1	3.0:1

Site	Properties	Site Area (sqm)	Zone	Assumed Cost of Land	Current FSR (LEP)	Council Master Plan FSR	Initial Planning Proposal FSR	Revised Planning Proposal FSR
4	499-505 King Georges Rd	1,052	E1	$5,625,000	2.0:1	3.0:1	4.0:1	3.0:1
5	507-517 King Georges Rd	1,689	E1	$10,134,000	2.0:1	3.0:1	5.5:1	5.0:1
6	526-530 King Georges Rd, 17 Norfolk Ave	1,622	E1, R2	$9,679,900	2.0:1	3.0:1	n/a	n/a

Source: Atlas

Minimum FSR Required in Mixed use Development

The next step divides the analysed site value rate ($1,100/sqm to $1,200/sqm GFA) into the assumed existing use values (assessed in Step 1 above) to derive the minimum GFA (and corresponding FSR) required so development site values are at least the same as the existing use values.

The rationale is that if the development site value of a site is the same or more that its value in existing use, there is incentive for the existing use to be 'displaced' and for the site to be redeveloped.

Table 4-2: Minimum FSR Required, Selected Sites

Site	Properties	Site Area (sqm)	Assumed Cost of Land	GFA Required (sqm)		FSR Required	
				Low	High	Low	High
		(a)	(b)	(c) = (b ÷ $1,200)	(d) = (b ÷ $1,100)	(e) = (c ÷ a)	(f) = (d ÷ a)
1	407-421 King Georges Rd	2,148	$13,605,300	11,338	12,368	5.3	5.8
2	437-441 King Georges Rd	903	$6,140,000	5,117	5,582	5.7	6.2
3	471-475 King Georges Rd	835	$5,761,500	4,801	5,238	5.8	6.3
4	499-505 King Georges Rd	1,052	$5,625,000	4,822	5,260	4.6	5.0
5	507-517 King Georges Rd	1,689	$10,134,000	8,445	9,213	5.0	5.5
6	526-530 King Georges Rd, 17 Norfolk Ave	1,622	$9,679,900	8,067	8,800	5.0	5.4

Source: Atlas

The analysis in **Table 4-2** shows that the FSRs required for feasible development on the selected sites varies from FSR 4.6:1 to FSR 5.8:1 (if an overall site value of $1,200/sqm GFA is assumed). If a lower site value of $1,100/sqm GFA is assumed, the required FSRs are higher and range from FSR 5.0:1 to FSR 6.3:1.

Generally, the smaller sites require a greater amount of GFA for feasible development as their existing use values are higher.

4.3 Summary of Observations

There are various factors affecting development feasibility and rarely is a single factor the only cause of poor feasibility. Urban land is subject to market factors which directly affect their land values and the feasibility of their development.

The following are a selection of factors that affect the feasibility of development in the Study Area.

- **Land Values and Site Consolidation**

  To economically acquire and develop land, the value of a site as a development prospect must exceed its existing use. Development will only occur if the proposed use is valuable enough to displace existing uses. For instance, while many existing buildings may be aged, they may still be providing a good level of functional utility and be relatively valuable. This is evident of many of the commercial buildings in the Study Area.

  Consequently, the acquisition of land for development can be a high-risk and high-resource activity, particularly where numerous sites have to be amalgamated prior to development. Where multiple properties are required, the payment of incentives over and above market value is often required to incentivise landowners to sell their properties.

  The 2023 Study ***has not*** assumed amalgamation incentives over and above existing-use values would be required. If incentives are assumed, the FSRs required for feasible development would be higher.

- **Cost of Construction**

  The cost of construction increases significantly as buildings become taller due to additional engineering and building compliance requirements (e.g. service shafts, fire escapes, etc). The cost to construct residential buildings up to 3 storeys, 9 storeys, 10-20 storeys and 20-40 storeys is different for these reasons.

  The cost of construction has been under significant upward pressure in the last 24 months. Some industry commentators expect cost rate escalations to return to trend from 2025. This does not mean construction cost prices will return to previous levels, merely that annual cost rises will be circa 3%-4% down from the current >10%.

- **Fees and Charges**

  A raft of new fees and charges are proposed to be introduced - HPC and water infrastructure charges. Being in the Sydney catchment, the proposed water charge is relatively nominal at $2,060 per equivalent tenant. The HPC charge at $10,000 per apartment is more substantial. Both charges are proposed to be phased-in over several years.

  Recently introduced fees and charges increase the cost base of development. These have the effect of reducing the value of development sites.

Overall, higher input costs reduce development feasibility and therefore, the development value of a site. Given the shift in construction cost pricing and the higher fees and charges which cumulatively increase the development cost base, the 2023 Study has adopted the lower end of development site value range ($1,100-$1,200/sqm of GFA) as observed (**Table 3-3**).

Table 4-3 summarises the feasibility analysis of selected sites against the Master Plan FSRs. All the sites require FSRs greater than endorsed by Council for the Master Plan.

Table 4-3: FSR Required and Planning Proposal FSR, Selected Sites

Site	Address	Site Area (sqm)	Council Master Plan FSR	Feasible?	FSR Required	Initial Planning Proposal FSR	Revised Planning Proposal FSR
1	407-421 King Georges Rd	2,148	3.0:1	No	5.3:1 to 5.8:1	5.5:1	5.0:1
2	437-441 King Georges Rd	903	3.0:1	No	5.7:1 to 6.2:1	5.5:1	3.0:1
3	471-475 King Georges Rd	835	3.0:1	No	5.8:1 to 6.3:1	4.0:1	3.0:1
4	499-505 King Georges Rd	1,052	3.0:1	No	4.6:1 to 5.0:1	4.0:1	3.0:1
5	507-517 King Georges Rd	1,689	3.0:1	No	5.0:1 to 5.5:1	5.5:1	5.0:1

Source: Atlas

In some instances the Planning Proposal envisages lower FSR than this Study finds to be required for feasible development.

The 2023 Study acknowledges that financial feasibility is not the only determinant of density. Environmental capacity and acceptable environmental impact are important planning considerations that the Planning Proposal has had regard to in putting forward the planning amendments sought.

4.4 Commentary on Council's Master Plan Principles and BHOA Revised Proposal

Council's Endorsed Master Plan Principles and Elements

Council's endorsed Master Plan principles seek to facilitate renewal in the Town Centre by creating opportunities for growth (through an expanded business zone and increased density controls in the existing business zone).

The Study agrees with the endorsed principles however observes the inadequacy of the proposed FSR controls to facilitate feasible development in the Town Centre. Feasibility analysis in this chapter found that all the tested sites require FSRs greater than those endorsed by Council for the Master Plan. Refer to **Table 4-3** for the FSRs required for development to be feasible compared to the endorsed FSRs for the Master Plan.

Beverly Hills Owners Association Revised Proposal

The BHOA Revised Proposal proposes FSRs revised to range from 3:1 to 5:1 along the western side of King Georges Road. **Table 4-4** summarises the feasibility analysis of selected sites against the BHOA Revised Proposal FSRs.

Table 4-4: Revised Proposal FSR, Selected Sites

Site	Address	Site Area (sqm)	FSR Required	Initial Planning Proposal FSR	Revised Proposal FSR	Feasible?
1	407-421 King Georges Rd	2,148	5.3:1 to 5.8:1	5.5:1	5.0:1	Marginal
2	437-441 King Georges Rd	903	5.7:1 to 6.2:1	5.5:1	3.0:1	No
3	471-475 King Georges Rd	835	5.8:1 to 6.3:1	4.0:1	3.0:1	No
4	499-505 King Georges Rd	1,052	4.6:1 to 5.0:1	4.0:1	3.0:1	No
5	507-517 King Georges Rd	1,689	5.0:1 to 5.5:1	5.5:1	5.0:1	Yes

Source: Atlas

The sites on the northern and southern ends of the western side of King Georges Road are proposed with FSR of 5:1.

- 407-421 King Georges Road was found to require an FSR range of 5.3:1 to 5.8:1 to be feasible for development. The proposed FSR of 5:1 is below the required range and is therefore not feasible. Should there be favourable market conditions (i.e. strengthening apartment end sale values relative to construction cost), development of the site could be marginal-to-feasible.
- 507-517 King Georges Road was found to require an FSR range of 5:1 to 5.5:1. The proposed FSR of 5:1 is at the lower end of the range and is therefore 'just' feasible.
- The proposed FSRs for the mid blocks - 437-441, 417-475 and 499-505 King Georges Road of 3:1 are well below the range needed for development to be feasible (FSR 5.7:1 to 6.2:1, FSR 5.8:1 to 6.3:1 and FSR 4.6:1 to 5.0:1 respectively). These sites are not expected to be feasible for development even in favourable market conditions.

The BHOA Revised Proposal has better prospects for redevelopment than Council's envisaged Master Plan, however only a small number of sites could be feasible for redevelopment.

References

ABS (2022). *Census of Population and Housing, 2021*. ABS, Canberra.

Georges River Council (2023). *Minutes of Council Meeting - Monday 24 April 2023*.

SCHEDULE 1

Cost of Land Assumptions

Feasibility analysis is undertaken to examine the minimum densities for feasible development to occur on select sites within the Study Area.

Existing-use Values

In **Table S1-1** the composite sites that comprise the development sites selected in the Study Area are ascribed an existing use value on a desktop basis. This is based on the site area, existing improvements and building areas.

Table S1-1: Sites Selected and Assumed Cost of Land

Site	Properties	Site Area (sqm)	Zone	Assumed Cost of Land		Adopted
1	407-421 King Georges Rd	2,148				$13,605,300
	407-409 King Georges Rd	797	E1	$6,900	$5,499,300	
	411-421 King Georges Rd	1,351	E1	$6,000	$8,106,000	
2	437-441 King Georges Rd	903	E1	$6,800	$6,140,400	$6,140,000
3	471-475 King Georges Rd	835	E1	$6,900	$5,761,500	$5,761,500
4	499-505 King Georges Rd	1,052	E1	$5,500	$5,786,000	$5,786,000
5	507-517 King Georges Rd	1,689	E1	$6,000	$10,134,000	$10,134,000
6	526-530 King Georges Rd, 17 Norfolk Ave	1,622				$9,679,900
	526 King Georges Rd	771	E1	$6,900	$5,319,900	
	528 King Georges Rd	152	E	$9,000	$1,368,000	
	530 King Georges Rd	179	E	$8,000	$1,432,000	
	17 Norfolk Ave	520	R2	$3,000	$1,560,000	

Source: Atlas

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3 May 2024

Gemma Bassett
Mecone

Sent via email: gbassett@mecone.com.au

Dear Gemma

Re: 407-511 King Georges Road - Affordable Housing Viability Assessment

Atlas Economics (**Atlas**) is engaged to assist the Beverly Hills Owners Association identify Affordable Housing contributions that could be made at 407-511 King Georges Road, Beverly Hills (**the Site**).

BACKGROUND

Beverly Hills Owners Association (**BHOA**) lodged a planning proposal (**the Proposal**) with Georges River Council (**Council**) in 2022. The Site consists of 52 contiguous allotments on the western side of King Georges Road.

The Proposal sought to amend the FSR controls to part 4:1 and part 5.5:1 and the building height control to part 44m and part 50m. The Proposal would enable 726-777 dwellings and provide for approximately 14,015sqm of retail/ dining/ entertainment floorspace, arranged within mixed use buildings of up to 12-14 storeys.

After Council did not indicate support, the Proponent submitted a request for a Rezoning Review.

In December 2023 the Strategic Planning Panel (**the Panel**) of the Sydney South Planning Panel recommended that the Proposal be submitted for a Gateway Determination because it demonstrated strategic merit.

In making its decision, the Panel recommended the Proposal is revised to address a number of issues, including *inter alia*:

- To add a site-specific clause, or other mechanism which provides:
    - A maximum height of building for:
        - 423-505 King Georges Road of part 12m (for 26m from Dumbleton Lane) and part 24.1m for remainder of these lots.
        - 'The corner 'gateway' lots being 407-421 and 507-511 King Georges Road of part 12m (for 14m from the western boundary) and part 31.4m for the remainder of these lots.
    - Maximum FSR of 3.5:1, including a non-residential FSR of 0.75:1.
    - That the maximum height and FSR can only be achieved if:
        - Land to be developed within the Site has a minimum width to King Georges Road of 20m.
        - The width of Dumbleton Lane is increased by 3m within the Site, to provide vehicular access and activate parts of the Lane with non-residential uses at ground level.
- Prepare an affordable housing viability report and clarify housing affordability rates, including floor space and number of units and method of management in-perpetuity to consider the delivery of affordable housing with the site consistent with the government's strategic housing policy. The Greater Sydney Region Plan and Sydney Central District Plan have affordable housing targets in the range of 5-10% of new residential floorspace subject to viability.

Atlas is engaged to prepare an Affordable Housing Viability Assessment (**the Study**) to address the Panel's requirements. In November 2023, Atlas previously prepared a feasibility analysis to assist development of a planning proposal at the Site (the 2023 analysis). The Study builds upon the work and findings of the 2023 analysis.

The Revised Proposal

The BHOA has prepared a revised urban design study to address the Panel's recommendations. Amendments now reflect:

1. Mid-block sites - maximum building heights of 7 storeys.
2. Corner sites - maximum building heights of 9 storeys.

All sites have a maximum FSR of 3.5:1, which includes a non-residential FSR of 0.75:1.

Figure 1: Panel-recommended Height (Storeys) and Floor Space Ratios (FSR)

Source: Olsson & Associates

Table 1 lists the recommended FSR and corresponding gross floor area (GFA) against individual areas of the Site. For context, the existing FSR and corresponding GFA is also shown.

Table 1: Existing FSR and Panel-recommended FSR, The Site

Site	Address	Site Area (sqm)	Existing GFA (sqm)	Potential FSR	Total GFA (sqm)	Non-residential GFA (sqm)	Residential GFA (sqm)	Potential Dwellings
		(a)	(b) = (2 x a)	(c)	(d) = (a x c)	(e) = (0.75 x a)	(f) = (d - e)	(g) = (e ÷ 90)*
1	407-421 King Georges Rd	2,148	4,296	3.5:1	7,518	1,611	5,907	66
2	437-441 King Georges Rd	903	1,806	3.5:1	3,161	677	2,483	28
3	471-475 King Georges Rd	835	1,670	3.5:1	2,923	626	2,296	26
4	499-505 King Georges Rd	1,052	2,104	3.5:1	3,682	789	2,893	32
5	507-517 King Georges Rd	1,689	3,378	3.5:1	5,912	1,267	4,645	52

*assuming average dwelling size 90sqm GFA

Source: Atlas

The Study relies on the foregoing development yields in testing the viability of Affordable Housing contributions. A full description of assumptions is contained in SCHEDULE 2.

Affordable Housing Policy

In its decision, the Panel noted the Greater Sydney Region Plan and Sydney South District Plan as having affordable housing targets of 5%-10% of new residential floorspace, subject to viability.

Greater Sydney Region Plan and District Plans

The Greater Sydney Region Plan (**the Region Plan**) states that Affordable Housing targets would be applied to precincts that are subject to a rezoning. In particular, the implementation of the Affordable Housing targets would be predicated on:

- The uplift in land value created as a result of the rezoning decision.
- The inclusion of other government development charges for essential local and state infrastructure so that communities do not forgo local amenity and services from s7.11 development contributions, Special Infrastructure Contributions and voluntary planning agreements.
- The necessary allowance for an increase in land value for vendors so that land is willingly sold into development projects that create housing supply.
- The necessary allowance for a normal profit margin on the capital invested and risk taken on projects.
- The requirements to have a separate approach for land release and urban infill areas given the differing circumstances in relation to development costs, development processes and land acquisition.

The Region Plan notes that targets in the range of 5%-10% on *new* (emphasis added) residential floorspace are generally viable.

The Greater Cities Commission (**the Commission**, formerly Greater Sydney Commission) issued Information Note 4 (GSC, 2017) to clarify application of the Affordable Rental Housing Targets in the Greater Sydney Region Plan and District Plans.

The Commission proposed Affordable Rental Housing Targets apply as follows:

- apply to land that is the subject of upzoning - a change of land use to residential or an increase in permissible residential development density.
- vary by precinct according to the local development viability.
- apply only to new areas nominated by the relevant planning authority; not apply retrospectively to rezoned land.
- be announced prior to rezoning to give the market certainty about the amount of affordable housing to be provided, and so that it can be factored into underlying land prices.
- apply to land within new urban renewal or land release areas (both government and private) identified via a local or district housing strategy, or another form of appropriate research that illustrates a current or future need for affordable rental housing.
- be calculated as a proportion of all residential floor space above the base floor space ratio - that is, the residential floor space ratio that was permissible before the upzoning within the nominated area.

Information Note 4 provides some parameters for an approach to development feasibility testing, including that the testing should consider "*the feasibility of residential development, with a normal risk/ return margin, including the cumulative costs of local, and where appropriate State contributions*".

The Study is guided by the contents of Information Note 4 in carrying out the viability assessment.

VIABILITY ASSESSMENT

The viability assessment is underpinned by the considerations of the Region Plan and Information Note 4, that is, the Affordable Housing Targets are calculated as a proportion of residential floor space ***above*** the base floor space ratio.

Base Scenario and *New* Residential Floorspace

The Study firstly considers the base scenario, that is, the development potential of the Site absent the Planning Proposal.

The Site is zoned E1 Local Centre and is subject to an FSR of 2:1 and maximum building height of 15m. There is no minimum non-residential FSR requirement.

Table 1 showed the GFA potential under existing planning controls and those recommended by the Panel. Under existing planning controls there is no minimum non-residential floorspace requirement. For the purposes of the testing, the ground floor is assumed to be non-residential (equivalent to FSR 0.5:1), with the remainder to be residential on the upper levels.

Table 2 shows the 'new' residential floorspace that results from the upzoning.

Table 2: New Residential Floorspace from Upzoning

Site Address		Site Area (sqm)	Existing Controls			Panel-recommended Controls			Rezoning	
			Total GFA (sqm)	Non-residential GFA (sqm)	Residential GFA (sqm)	Potential GFA (sqm)	Non-residential GFA (sqm)	Residential GFA (sqm)	New Residential GFA (sqm)	New Dwellings
		(a)	(b) = (2 x a)	(c) = (0.5 x a)	(d) = (b – c)	(e) = (3.5 x a)	(f) = (0.75 x a)	(g) = (e – f)	(h) = (g – d)	(i) = (h ÷ 90)*
1	407-421 King Georges Rd	2,148	4,296	1,074	3,222	7,518	1,611	5,907	2,685	30
2	437-441 King Georges Rd	903	1,806	452	1,355	3,161	677	2,483	1,129	13
3	471-475 King Georges Rd	835	1,670	418	1,253	2,923	626	2,296	1,044	12
4	499-505 King Georges Rd	1,052	2,104	526	1,578	3,682	789	2,893	1,315	15
5	507-517 King Georges Rd	1,689	3,378	845	2,534	5,912	1,267	4,645	2,111	23

*assuming average dwelling size 90sqm GFA

Source: Atlas

Table 3 applies the Affordable Housing targets (5%-10%) identified in the Region Plan to the 'new' residential floorspace enabled by the rezoning.

Table 3: Affordable Housing Targets for Testing (5%-10%)

Site Address		New Residential GFA (sqm)	New Dwellings	5% Affordable Housing		10% Affordable Housing	
				GFA (sqm)	Dwellings	GFA (sqm)	Dwellings
		(a) = (h) in **Table 2**	(b) = (i) in **Table 2**	(c) = (5% x a)	(d) = (5% x b)	(e) = (10% x a)	(f) = (10% x b)
1	407-421 King Georges Rd	2,685	30	134	1.5	269	3.0
2	437-441 King Georges Rd	1,129	13	56	0.6	113	1.3
3	471-475 King Georges Rd	1,044	12	52	0.6	104	1.2
4	499-505 King Georges Rd	1,315	15	66	0.7	132	1.5
5	507-517 King Georges Rd	2,111	23	106	1.2	211	2.3

*assuming average dwelling size 90sqm GFA

Source: Atlas

At the stated Affordable Housing targets, the Affordable Housing resulting from the built form scenarios is equivalent to:

- 5% of new residential floorspace - 52sqm to 134sqm GFA (equivalent to 0.6 to 1.5 dwellings).
- 10% new residential floorspace 104sqm to 269sqm GFA (equivalent to 1.2 to 3 dwellings).

The next section carries out feasibility testing to examine if the foregoing Affordable Housing targets are viable.

Methodology and Approach

The feasibility testing takes an approach consistent with Information Note 4 and uses the Residual Land Value (RLV) method. This method assesses the potential revenue on completion of the development, deducts development costs and makes a further deduction for profit and risk that a developer and financier would require to take on the project. If the project return and development margin are above minimum hurdles, the development is considered feasible.

The RLV can be defined as the maximum price a developer would be prepared to pay for a site in exchange for the opportunity to develop a particular development scheme whilst achieving target hurdle rates for profit and project return. For a development to be considered feasible, the RLV must exceed the Site's 'base land value' or opportunity cost of land.

The RLV method is intended to mimic the thought process of a developer; the outcomes are validated against analysed market activity to ensure alignment. While direct comparison against market evidence is important, the Study acknowledges a lack of market sales evidence that reflects the following factors:

- Recent commencement of new fees and charges (Housing and Productivity contributions, Sydney Water charges).
- Significant increase in construction cost prices resulting from supply chain disruptions and labour shortages.
- Softening end sale values (for completed product) resulting from interest rate rises and inflationary environment.

While the RLV method relies on a number of assumptions (cost and revenue), it is still the most suitable for the purposes of assessing the viability/ tolerance of development feasibility to Affordable Housing targets particularly given the lack of direct market activity reflecting the above factors.

The RLV method is also the most suitable method through which to meet the parameters suggested by Information Note 4, that is, to consider "*the feasibility of residential development, with a normal risk/ return margin, including the cumulative costs of local, and where appropriate State contributions*".

The analysis of market activity is in SCHEDULE 1 and the feasibility testing assumptions are detailed in 0.

The feasibility testing is undertaken in three steps:

1. **Step 1 - Base Case opportunity cost of land**

   Step 1 considers the 'base value' of the Site. The Site is improved with a variety of commercial buildings. The 'base land value' is referred to as the 'Opportunity Cost of Land'.

   Based on an analysis of market activity, individual values are assumed as the Opportunity Cost of Land. These base values and the analysis of market activity are provided at SCHEDULE 1.

2. **Step 2 - Viability of Affordable Housing contributions**

   Step 2 tests the scope for Affordable Housing contributions assuming the recommendations of the Panel.

   Revenue assumptions are developed based on an analysis of market activity. Cost assumptions are based on cost publications and past experience. Statutory fees and charges (including those recently introduced) are also assumed.

Assumptions and Limitations

Atlas acknowledges the assumptions and limitations associated with this Study.

- Market research is carried out on a 'desktop' basis without the benefit of site surveys and internal inspections.
- Development yields assumed (Scenario 1 and 2) are conceptual and are not architectural and/ or engineering tested.
- Revenue assumptions are based on a review of recent market activity. Atlas acknowledges that the market has been adversely impacted by interest rate rises over the past 12-18 months which has dampened price growth and demand.
- Construction prices have increased significantly (circa 20%-30%) over the past 24 months across the country.

Lenders require mortgage valuations to assume certain hurdle rates; while market appetite may vary with development/ market cycles, capital finance requirements do influence the parameters within which a development project is 'bankable'.

Table 4 outlines the target hurdle rates adopted for the feasibility testing.

Table 4: Benchmark Hurdle Rates

Hurdles	Feasible	Marginal	Not Feasible
Development Margin	>20%	18%-20%	<18%
Project Return (IRR)	>18%	17%-18%	<17%

Source: Atlas

The feasibility testing outcomes in Step 2 is presented to show whether Affordable Housing contributions at 5% and 10% are viable, that is, after making the contributions the development still achieves the target (minimum) hurdle rates.

Testing the Feasibility of Development (Step 1)

Table 5 show the feasbility of development ***before*** contribution of 5% Affordable Housing at the Site.

Table 5: Modelling Results (Step 2)

	407-421	437-441	471-475	499-505	507-517
Site Area (sqm)	2,148	903	835	1,052	1,689
Total GFA (sqm)	7,518	3,161	2,923	3,682	5,912
Residential GFA (sqm)	5,907	2,483	2,296	2,893	4,645
Non-residential GFA (sqm)	1,611	677	626	789	1,267
Revenue					
Gross Sales Revenue	$62,787,750	$26,589,763	$24,670,413	$3,503,050	$49,449,838
Less: Selling Costs	($726,878)	($307,898)	($285,704)	($353,031)	($572,498)
Total Revenue (before GST paid)	$62,060,873	$26,281,865	$24,384,708	$30,150,020	$48,877,339
Less GST paid on revenue	($4,587,600)	($1,946,255)	($1,807,236)	($2,224,291)	($3,614,473)
Total Revenue (after GST paid)	$57,473,273	$24,335,610	$22,577,472	$27,925,729	$45,262,866
Costs					
Land Purchase Cost (Opportunity Cost of Land)	$13,605,300	$6,140,000	$5,761,500	$5,786,000	$10,134,000
Transaction Costs	$867,400	$382,155	$357,553	$359,145	$641,765
Construction Costs (incl. Contingency)	$32,050,904	$13,526,029	$12,480,786	$15,650,597	$25,195,535
Professional Fees	$3,568,274	$1,509,666	$1,394,013	$1,732,777	$2,798,933
Statutory Fees	$2,572,021	$1,089,726	$1,010,425	$1,249,216	$2,025,373
Affordable Housing Contributions	-	-	-	-	-
Land Holding Costs	$203,317	$46,447	$37,879	$65,221	$145,483
Finance Charges	$182,000	$80,500	$77,000	$87,500	$147,000
Interest Expense	$2,421,873	$1,021,053	$943,560	$1,162,042	$1,893,573
Total Costs (net GST)	$55,471,087	$23,795,576	$22,062,715	$26,092,497	$42,981,662
Performance Indicators					
Development Margin	3.6%	2.2%	2.3%	6.9%	5.2%
Project Return (IRR)	6.5%	5.3%	5.3%	9.5%	7.9%
Residual Land Value (excl. GST)	$8,106,180	$3,504,765	$3,305,908	$3,918,345	$6,430,896
($/sqm GFA)	$1,078	$1,108	$1,131	$1,064	$1,088
Analysis of Residual Land Value (RLV)					
Comparison to Opportunity Cost of Land	($5,499,120)	($2,635,235)	($2,455,592)	($1,867,655)	($3,703,104)
Feasible?	No	No	No	No	No

The modelling shows development on the Site is not feasible under the planning controls recommended by the Panel (FSR 3.5:1 with a minimum FSR 0.75:1 non-residential).

Atlas' 2023 analysis previously found the following FSRs were required (at a minimum) for development to be feasible:

- 407-421 King Georges Road - FSR 5.3:1 to 5.8:1.
- 437-441 King Georges Road - FSR 5.7:1 to 6.2:1.
- 471-475 King Georges Road - FSR 5.8:1 to 6.3:1.
- 499-505 King Georges Road - FSR 4.6:1 to 5.0:1.
- 507-517 King Georges Road - FSR 5.0:1 to 5.5:1.

The Site is not feasible to develop at the recommended FSR 3.5:1, let alone contribute to Affordable Housing or public benefit works in a voluntary planning agreement.

Viability of Affordable Housing Contributions (Step 2)

For a rezoning proposal to be feasible, the residual land value should be higher than the base scenario, i.e. what the Site is worth in its existing use (no rezoning). If the land value of the Site (post rezoning) is lower than (or the same as) the Opportunity Cost of Land, there is no financial incentive to undertake the Proposal.

The feasibility modelling shows that development to the recommended FSR 3.5:1 is not feasible (even before Affordable Housing or VPA contributions).

No further testing is therefore undertaken given that development is not feasible in Step 1.

Summary of Findings

Development of the Site is not feasible (under the planning controls recommended by the Panel). Accordingly, Affordable Housing contributions are not viable.

It would be a matter for the Proponent whether an Affordable Housing contribution offer is made. If such an offer were to be made, it would represent a significant commercial compromise given how significantly short the performance indicators (development margin and project return) fall below the benchmark hurdle rates.

We trust this assists the Proponent with development of a VPA offer in the context of the reduced development density recommended by the Panel. Please contact the undersigned with queries.

Yours sincerely

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Reference List

Greater Sydney Commission (2018). *Greater Sydney Region Plan*. Accessible here: https://www.planning.nsw.gov.au/sites/default/files/2024-04/greater-sydney-region-plan.pdf

Greater Sydney Commission (2017). *Affordable Rental Housing Targets Information Note 4. Revised October 2017*. Accessible here: https://greatercities.au/sites/default/files/2023-07/information_note_4_affordable_rental_housing_targets_updated_october2017.pdf

SCHEDULE 1

Analysis of Sales Activity

Opportunity Cost of Land

This section analyses market activity to assess a 'base value' (or Opportunity Cost of Land) for the Site as currently zoned.

Analysed Sales Activity

Several retail properties have transacted in the Beverly Hills Town Centre in the last 12-24 months, many of which sold with passing rents or marketed as having development potential.

Table S1-1 provides a sample of low density commercial sales in Beverly Hills and surrounding centres in the LGA.

Table S1-1: Analysis of Sales Activity, Beverly Hills and Surrounds

Address	Zone	Sale Price (Sale Date)	Floor Area (site area)	$/sqm floor area	$/sqm improved site area	Passing yield
484 King Georges Rd Beverly Hills	B2	$1,550,000 (8/22)	200sqm (195sqm)	$7,750	$7,949	3.6%
Situated in the Town Centre, 100m south of the train station. Two storey shop top sold with passing rent of $55,592 per annum. Occupied by massage parlour. Advertised as having potential for alteration/extension.						
457 King Georges Rd Beverly Hills	B2	$1,828,000 (9/21)	390sqm (284sqm)	$4,687	$6,437	4.3%
Situated in the Town Centre, approx. 290m from the train station. Operating as a cafe with upper floor residence. Basic fit-out, presents neatly. Advertised as having development potential.						
482 King Georges Rd Beverly Hills	B2	$2,060,000 (5/21)	360sqm (198sqm)	$5,722	$10,404	3.9%
Corner commercial building, situated at the intersection of King Georges Rd and Morgan St within the Town Centre. Approx. 30m south of the train station. Multi-tenanted, sold with passing rent of $80,400 per annum.						
471-475 King Georges Rd Beverly Hills	B2	$5,720,000 (5/21)	850sqm (835sqm)	$6,729	$6,850	-
Large, two storey retail building within Town Centre, 350m south of train station. Original, tired condition. Sold with DA for 2 storey restaurant. Purchased by owner-occupier.						
2 Woodville St Hurstville	B4	$6,000,000 (10/22)	1,080sqm (656sqm)	$5,556	$9,146	1.2%
Low rise, 3 level commercial building in the Hurstville Town Centre. Sold partially leased returning $72,631 per annum with 2-level vacancy (potentially returning additional $312,900 per annum). Sale price reflects 6% yield if fully leased.						

Source: Realcommercial/PriceFinder

As observed in **Table S1-1** limited sales have occurred in the Town Centre in the last 12 months, indicating that retail properties in the main shopping strip are tightly held. Sale prices are also broadly aligned with surrounding centres including Riverwood. Based on the recent sales activity, retail properties in the Town Centres typically achieve price points ranging $4,700/sqm to $7,750/sqm of floor area or $6,400/sqm to $10,400/sqm of improved site area.

Some properties within the Site are on small allotments (<300sqm). It is an accepted rule of thumb, that all things being equal, a small property is worth more on a rate per square metre. Accordingly, small fine grain properties within the Site are expected to sell for in the upper end of the $6,900/sqm to $10,400/sqm range.

Existing-use Values

In **Table S1-2** the composite sites that comprise the Site are ascribed an existing-use-value on a desktop basis. This is based on the site area, existing improvements and building areas.

Table S1-2: Sites Selected and Assumed Opportunity Cost of Land

Site	Properties	Site Area (sqm)	Zone	Assumed Cost of Land		Adopted
1	407-421 King Georges Rd	2,148				$13,605,300
	407-409 King Georges Rd	797	E1	$6,900	$5,499,300	
	411-421 King Georges Rd	1,351	E1	$6,000	$8,106,000	
2	437-441 King Georges Rd	903	E1	$6,800	$6,140,400	$6,140,000
3	471-475 King Georges Rd	835	E1	$6,900	$5,761,500	$5,761,500
4	499-505 King Georges Rd	1,052	E1	$5,500	$5,786,000	$5,786,000
5	507-517 King Georges Rd	1,689	E1	$6,000	$10,134,000	$10,134,000

Source: Atlas

Residential Development Sites

This section analyses sales activity of residential development sites (medium and higher density) to observe prices paid. This analysis enables a comparison against the residual land values assessed in Step 2 (**Table 5**).

Very limited development site sales activity has been observed in Beverly Hills over the past 6-12 months – a reflection of soft economic conditions with developers remaining cautious over this period. To enable insight into the prices paid for development opportunities within Beverly Hills, development site sales deemed most relevant have been analysed whilst accounting for varying market conditions, lot sizes and other pricing determinants. These are detailed in **Table S1-3**.

Table S1-3: Analysis of Development Site Sales Activity, Beverly Hills and Surrounds

Address	Site Area (Zone)	FSR (GFA)	Sale Price (Sale Date)	$/sqm GFA	Comments
309 Princes Hwy Carlton	562sqm (B2)	2.5:1 (1,405sqm)	$1,900,000 (12/22)	$1,352	Situated in the southeastern end of the LGA, 6km from the Study Area. Main road location, 1km south of the Carlton Station within retail shopping strip. Sold without DA. Superior locality, more established with better urban/ retail amenity and transport accessibility.
41 Broadarrow Rd Narwee	1,696sqm (B2)	3.8:1 (6,424sqm)	$8,200,000 (8/22)	$1,276	Occupied by AMPOL service station, mechanics workshop and residence. DA **approved development site for 61 residential apartments** and retail floorspace. Approved GFA of 6,424sqm. Sold with holding income. Situated adjacent to Narwee Town Centre and opposite train station.
1258-1260 Canterbury Rd Roselands	446sqm (B2)	-	$1,705,000 (5/22)	-	Mortgagee in possession sale. Approx. 1km from Roselands Shopping Centre and Punchbowl Station. Sold with **DA for 14 residential units. I**mproved with 2 existing shop tops.
280-300 Lakemba St Wiley Park	5,868sqm (B2)	2.3:1 (13,566sqm)	$15,000,00 For sale	$1,106	'Wiley Park Plaza', situated at the corner of Lakemba St and King Georges Rd. **DA approved for 142 apartments/ 13,566sqm GFA.** Situated 350m north of the Wiley Park Station. On the market for 23 days.
1-3 English St Kogarah	991sqm (R4)	2:1 (1,982sqm)	$2,500,000 For sale	$1,261	Situated 300m from Carlton Station and 750m from Kogarah Town Centre. Improved with 2 residential flat buildings. Marketed to developers and investors, with holding income. Agent notes potential development for 20-22 apartments. Offers have been received circa $2.5m.

Source: Realcommercial/PriceFinder

Overall, the sales analysis indicates price points ranging $1,100/sqm to $1,400/sqm potential GFA for sites with development potential. The upper price range includes the site sale observed in Carlton, which is considered a superior location to the Town Centre due to its higher level of amenity and accessibility.

The Study considers a site value of $1,100/sqm to $1,200/sqm potential GFA to be applicable to the Town Centre.

Some of the sites are observed to have the benefit of development consent. With current development activity constrained by inflationary construction costs, development consent is particularly valuable, saving time and cost associated with the planning approval process.

New Apartments Sales

A review of new units being marketed 'off the plan' in Beverly Hills revealed a lack of new apartment developments progressed in the locality. Few apartment developments have been delivered to the western side of King Georges Road in the last decade, mainly scall-scale, low rise buildings.

To understand the potential price points of new apartments on the Site, recent sales within surrounding localities were analysed. Few of these 'off the plan' projects are detailed in **Table S1-4**.

Table S1-4: Select New Apartment Pricing, Surrounding Localities

Address	Sale Price Range	$/sqm NSA	Comments
The Rise, 206-214 Railway Pde Kogarah		Average $10,800-$12,600	Circa 13 level development situated 500m east of Carlton Station, 650m west of Kogarah Station and 6km southeast of the Town Centre. The project will deliver 47 units in a mix of 1, 2 and 3 bedrooms, and feature harbour and city views. Estimated completion late 2024.
1b	$640,000-$680,000		
2b	$810,000-$950,000		
3b	$1,250,000-$1,325,000		
54-56 Graham Rd Narwee		Average $8,400-$11,700	Boutique 3-level development set to deliver 20 apartments in a mix of 1, 2 and 3 bedrooms. Situated 750m northwest of the Narwee Station and 2km northwest of the Town Centre. Completion expected to occur late 2024.
1b	$595,000-$620,000		
2b	$665,000-$730,000		
3b	From $780,000		

Source: realestate.com.au

In the surrounding areas of Beverly Hills, majority of new apartments marketed 'off the plan' are situated within the Kogarah Town Centre, some 6km southeast of the Site. The Kogarah Town Centre benefits from its established public transport infrastructure, diverse mix of retail offerings and commercial services including anchor supermarket Woolworths. New apartments are therefore priced above the range of other localities including Narwee and Roselands.

Table S1-5 provides a sample of modern 1, 2 and 3-bedroom apartment sales in Beverly Hills.

Table S1-5: Established Apartment Sales, Beverly Hills

Unit Type	Address	Building Level	Internal Area (sqm)	Sale Price ($)	Sale Date	Sale Price ($/sqm)
1b	2/442-444 King Georges Rd	Ground	60	$420,000	Feb 2022	$7,000
2b	8/2-4 Hampden St	2	78	$638,000	Aug 2022	$8,180
	5/36-44 Tooronga Tce	Ground	80	$640,000	Sep 2022	$8,000
3b	5/2-4 Hampden St	Ground	85	$777,000	Jan 2023	$9,140
	9/10-12 Hampden St	1	118	$870,000	Feb 2023	$7,370

Source: Realestate.com.au/PriceFinder

Overall, there are very limited modern apartments in Beverly Hills, most of which are within boutique, 2 to 3 storey developments. Due to low building levels, apartment pricing generally varies based on the age/ quality of development, floorplan and size, as opposed to aspect/views offered.

The Study expects new apartments on the Site to achieve rates of between $9,500/sqm and $10,500/sqm of internal area.

SCHEDULE 2

Feasibility Testing Assumptions

Project Timing

Pre-sales marketing commences in Month 9. Site preparation commences in Month 21 and construction is for 12-24 months per stage. Development is staged to commence as 50% pre-sales is achieved.

Built Form Scenario

Development yields in **Table S2-1** are developed numerically based on site area and FSR controls.

Table S2-1: Scenarios Tested

Site	Address	Site Area (sqm)	Potential FSR	Total GFA (sqm)	Non-residential GFA (sqm)	Residential GFA (sqm)	Potential Dwellings
1	407-421 King Georges Rd	2,148	3.5:1	7,518	1,611	5,907	66
2	437-441 King Georges Rd	903	3.5:1	3,161	677	2,483	28
3	471-475 King Georges Rd	835	3.5:1	2,923	626	2,296	26
4	499-505 King Georges Rd	1,052	3.5:1	3,682	789	2,893	32
5	507-517 King Georges Rd	1,689	3.5:1	5,912	1,267	4,645	52

*assuming average dwelling size 90sqm GFA

Source: Atlas

The apartments comprise a mix of unit sizes. Minimum parking requirements under the Georges River DCP are detailed.

Table S2-2: Apartment Unit Mix and Parking Assumptions

Apartment Type	Mix	Net Saleable Area (sqm)	Gross Floor Area (sqm)	Min. Parking (per dwelling)
1-bedroom units	20%	61	72	1 space
2-bedroom units	65%	76	89	1 space
3-bedroom units	15%	100	118	2 spaces
Average Internal Area (sqm)		**77**	**90**	0.2 visitor space

Source: Georges River DCP

Revenue

Average end sale values are adopted based on property market research and analysis.

Table S2-3: End Sale Values

Land Uses	End Sale Values			
1-bedroom units		61sqm	$10,500	$640,500
2-bedroom units		76sqm	$10,000	$760,000
3-bedroom units		100sqm	$9,500	$950,000
Commercial	$8,500/sqm			

Source: Atlas

It is assumed that 50% of the residential yield would be pre-sold prior to commencement of construction and the balance would be sold prior to completion of construction at an average rate of 4-5 units per month.

Other revenue assumptions:

- GST is excluding on non-residential sales and included on the residential sales.
- Sales commission at 2.5% (residential) and 1.5% (non-residential) gross sales.
- Marketing costs of 1% on gross sales and legal cost on sales included at $1,500 per dwelling.

Costs

- Land purchase cost imputed by the Opportunity Cost of Land (**Table S1-2**).
- Legal costs, valuation and due diligence was assumed at 1% of land price and stamp duty at NSW statutory rates.
- Construction costs are assumed based on past experience:
    - Apartment build cost - $3,000/sqm and balconies - $1,000/sqm
    - Commercial - $3,000/sqm
    - Parking - $60,000 per space

Other cost assumptions include:

- Professional fees at 9.5% of construction cost.
- Development management at 1% of construction cost.
- Statutory fees:
    - DA and CC fees at Council's fees and charges.
    - Long service levy of 0.25% of construction costs.
- s7.11 contributions at:
    - $15,478 per dwelling (1 bedroom)
    - $20,000 (2 bedroom and 3 bedroom).
- Housing and Productivity contributions at $10,000 (apartments), $30/sqm GFA (commercial).
- Sydney water infrastructure charges at $805 per ET.
- Land holding costs applied at statutory rates.
- Finance costs:
    - Land purchase cost as equity with remainder financed at interest capitalised monthly at 8% per annum.
    - Establishment fee at 0.35% of peak debt.

Hurdle Rates

Key performance indicators relied upon are hurdle rates (development margin[1] and project IRR[2]). Benchmark hurdle rates and their 'feasible' ranges are indicated in **Table S2-4**.

Table S2-4: Benchmark Hurdle Rates

Performance Indicator	Feasible	Marginal to Feasible	Not Feasible
Development Margin	>20%	18%-20%	<18%
Project Return (IRR)	>18%	17%-18%	<17%

Source: Atlas

[1] Development Margin is profit divided by total costs (including selling costs)
[2] Project IRR is the project return on investment, the discount rate where the cash inflows and cash outflows are equal

NORTHROP

HYDRAULIC REPORT

Beverly Hills Town Centre – APA Gas Report

Ref: SY223341-00-HY-RP01
Rev: 3
Date: 02 May 2024

PREPARED FOR
Mecone
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179 Elizabeth Street
Sydney 2000

Hydraulic Report

Revision Information

Project:	Beverly hills Town Centre – APA Gas Report
Document Title:	Hydraulic Report
Client:	Mecone
Revision:	2
Status:	Draft Issue
Revision Date:	02 May 2024
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1. General

Northrop Consulting Engineers Pty. Ltd. (Northrop) was engaged to provide a desktop investigation and summary of existing gas services relating to the proposed development at Beverly hills Town Centre – APA Gas Report. The proposed development will impact 52 continuous allotments covering area of 16,291m² and is located within the Georges River Local Government Area (LGA). This desktop review will be used to highlight potential impacts and considerations that are currently present.

The existing gas main is owned and operated by APA Pty Ltd. This pipe is part of the Moomba - Sydney pipeline. A bi-directional gas pipe which is used to transport both natural gas and ethane.

The pipework which is affected in this report travels to Botany Bay, NSW and is responsible for carrying ethane gas for industrial purposes.

Northrop has contracted APA Group for information that is present in this report. This high-level consultation has provided us with basic information regarding the size and depth of the gas main. Correspondence was provided through emails and telephone conversations.

Figure 1-1 Proposed development site with route of gas line

2. Proposed Development

The proposed concept design shows a full re-development to the existing Beverly Hills Town Centre, into mixed development high rise. The subject site in question is the north-block is located at 407 King Georges Rd, Beverly Hills will be renovated and rebuilt with a 31.4m tall mixed-use building. This building will be the closest and largest to be constructed adjacent to the main.

Due to the size of the proposed building, foundation and footing sizes will be required as part of the engineering works. While the current gas line easement adjacent to the proposed property is outside the construction zone. However, the zone of influence will be impacted due to the construction of basements, footings and piers.

Subsequently, large and extensive excavation works in close proximity to the gas main will be required during the construction phase for the proposed north block. These works may damage the pipework due to over excavation, or land slippage if shoring is not provided during excavation. Additionally, geotechnical and flood reports will also have impact on the size and type of structure. This also included proposed vibrations impacts of piling, vehicle and machinery movements.

Figure 2 Concept design of the redevelopment with gas main overlay.

2.1 Existing Gas Line and APA Requirements

The current gas line is located adjacent to the rail corridor in Beverly Hills, NSW. The ethane gas main is owned and operated by APA Group Pty Ltd and is currently installed with a 6-metre easement which runs parallel along the rail corridor. Preliminary desktop investigations show that this gas main is a DN200 steel main and can achieve pressures from 1050kPa to 10,000kPa. The main is on average approximately 0.9 – 1.2m deep. However, this may be up to 1.8m deep when installed along a rail corridor. Pipework installed along the rail corridor is generally installed with concrete protection slabs over the top.

Ethane is a flammable gas that has similar characteristics to that of Natural Gas, however it is predominately used in industrial processes, mainly in the production of plastics and detergents, as opposed to being used as a heating gas. Damage to this pipe during construction will cause significant ramifications to those on site and in surrounding areas.

All proposed works within the vicinity of this gas main and easement, require written consent and confirmation from APA Group Pty Ltd. This includes information such as:

- Details and specification of any earthworks proposed on the easement/pipeline area
- A professionally prepared landscape plan by a qualified landscape architect
- Planting plan and schedule showing species, quantities, size when installed, mature size, height, canopy, and root ball sizes
- Likely timing of works.

Any developments that could affect the access or maintenance of this pipeline. For development within 600m of the pipeline, APA requests that the NSW Dept Planning, Councils and Developers engage with APA in the early design stages particularly where there is an to be an increase in sensitive uses, i.e. schools, childcare, aged care, buildings with 5 or more stories.

The existing gas main must be located through non-destructive digging techniques such as electronical location technology and wet-vac truck digging. These works must be conducted under APA's guidance and approval. Current DBYD information is to be obtained from both designers and contractors. Exact locations of the main are to be confirmed by APA Group, these cannot be assumed or be measured from DBYD information.

This gas main has already had noticeable impact on other developments within the local area. The proposed Beverly Hills Commuter Car Park development was required to have a structural set back of at least 3m or more from the gas main. We note that the proposed works at 407 King Georges Rd will require a similar or greater set back.

This construction set back was done in consultation to APA Group under their national construction guidelines. These guidelines show clear examples of exclusion zones from pipework and easements to ensure compliant and safe building design.

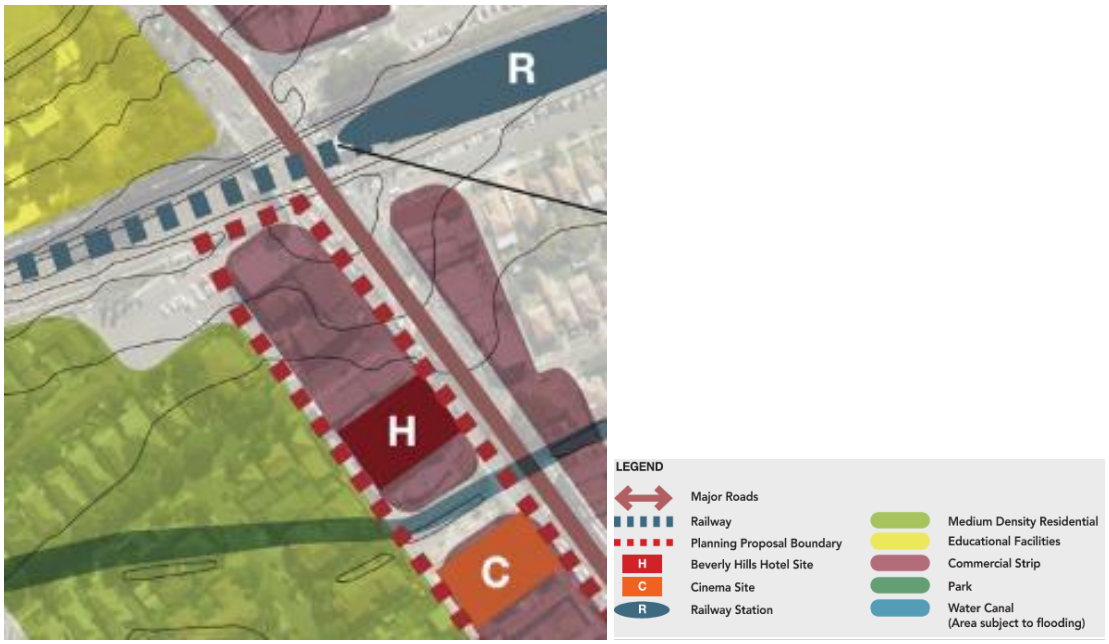

Figure 3 - Proposed development of Beverly Hills Commercial Strip

Figure 4 – 6 m Easement adjacent to railway corridor

The zone of influence of the pipework must also be adhered to, an example of this is provided in the screenshot below.

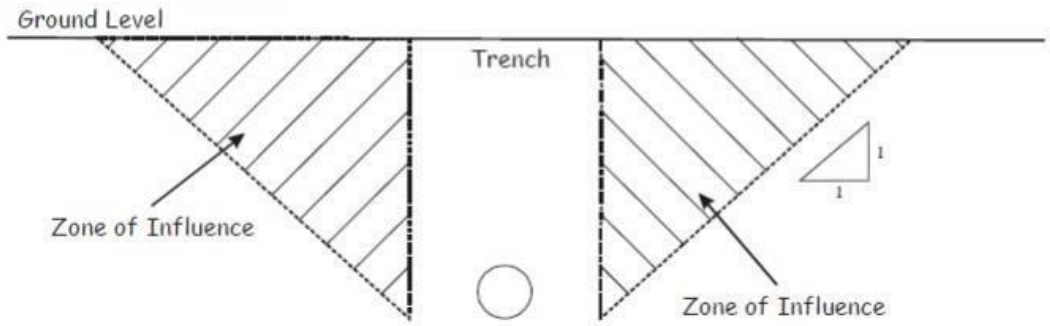

Figure 5 - Zone of influence

2.2 Considerations and further works

APA Group Pty Ltd is to be considered and available to provide consultation at each key design phase. This collaboration will ensure that the proposed building is designed and constructed safely adjacent to the gas main. Approval shall also be sort from the Georges River Local Government Area.

Additional construction and site investigation costs may also be reduced if the building set back of the mixed residential building is moved away from the gas main. This change will remove foundations away from the zone of influence. Building elements such as a central courtyard / extension of public domain would be seen as favourable and would reduce the likely hood of causing impact to the main and ensure adequate access is available for maintenance.

Design documentation from structural engineers and landscape architects that is within this range is to be passed onto APA. Any buildings that include sensitive areas like schools, childcare facilities, aged care facilities, or buildings with five or more stories should also be passed on to APA Group for review and assessment.

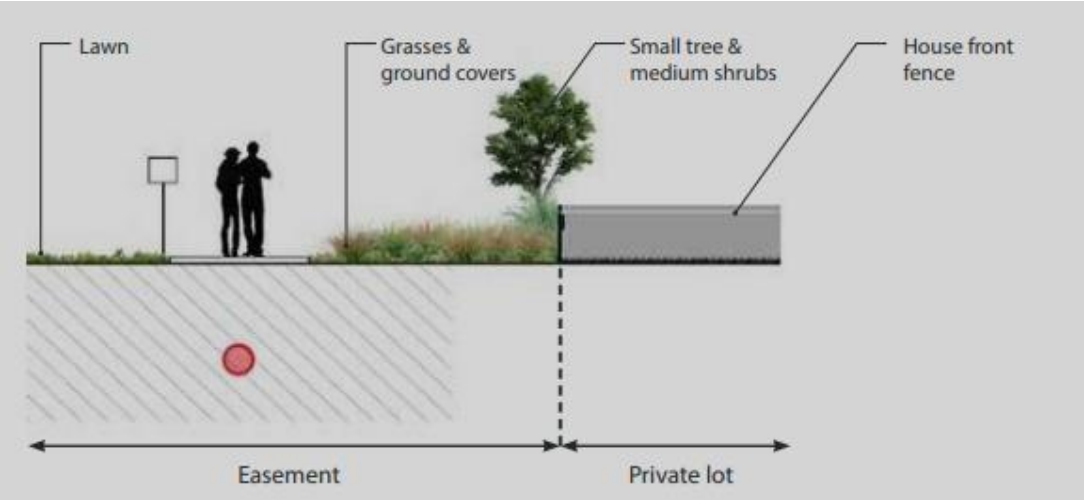

Figure 6 - Typical sections provided by APA