

Planning Proposal



Crossroads, Casula

Amendment to Liverpool Local Environmental Plan 2008
to permit an additional use

Submitted to Liverpool City Council
On Behalf of Costco Wholesale Australia Pty Ltd

July 2011 ■ 10755

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Date July 2011

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Date July 2011

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Essential Economics Pty Ltd
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Mott MacDonald Hughes Trueman
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Halcrow

1.0 Introduction

This Planning Proposal has been prepared by JBA Planning on behalf of Costco Wholesale (Australia) Pty Ltd in regard to land at Crossroads, Casula ("The Site").

This Planning Proposal is submitted to Liverpool City Council (Council) to support a request by Costco Wholesale (Australia) Pty Ltd (Costco) to initiate the preparation of a site specific Local Environmental Plan (LEP) relating to the Site in accordance with Section 55 of the *Environmental Planning & Assessment Act 1979* (EP&A Act).

The purpose of the site specific LEP is to identify specific development that may be carried out with consent on the Site through an amendment to Schedule 1 of the *Liverpool Local Environmental Plan 2008* (Liverpool LEP 2008).

As required by Section 55 of the EP&A Act, this Planning Proposal includes the following:

- a statement of the objectives or intended outcomes of the proposed instrument;
- an explanation of the provisions that are to be included in the proposed instrument;
- the justification for those objectives, outcomes and provisions and the process for their implementation (including whether the proposed instrument will comply with relevant directors under Section 117);
- concept plan of the Site showing sufficient detail to indicate the effect of the proposal; and
- details of the community consultation that would be expected to be undertaken by Costco before consideration is given to making of the proposed instrument.

The Planning Proposal has been prepared having regard to "*A guide to preparing local environmental plans*" and "*A guide to preparing planning proposals*" published by the Department of Planning (DoP) in July 2009. It has also been prepared following preliminary discussions with planning officers at Council.

It is requested that the Council forward the Planning Proposal to the Minister for Planning for Gateway determination in accordance with Section 56 of the EP&A Act. The Gateway determination by the Minister will decide:

- whether the matter should proceed (with or without variation);
- whether the matter should be resubmitted for any reason (including for further studies or other information, or for the revision of the Planning Proposal);
- the community consultation required before consideration is given to the making of the proposed instrument;
- any consultation required with State or Commonwealth public authorities that will or may be adversely affected by the proposed instrument;
- whether a public hearing is to be held into the matter by the Planning Assessment Commission or other specified person or body; and
- the times within which the various stages of the procedure for the making of the proposed instrument are to be completed.

The objective outcome of the Planning Proposal and LEP amendment is to enable the provision of a new Costco Warehouse on the Site.

1.1 Costco Wholesale and Retail Premises Model

Costco Wholesale (Australia) Pty Ltd is part of the Costco Companies Incorporated, which operates from some 582 locations worldwide, including the USA and Puerto Rico (424), Canada (80), Mexico (32), United Kingdom (22), Korea (7), Taiwan (6), Japan(9) and Australia(1).

Costco offers a new and unique form of retailing, previously not experienced within NSW or Australia until the opening of the Costco store in Melbourne on 17th August 2009. The first Costco in NSW is intended to open in Auburn in July 2011.

The underlying principle supporting the Costco approach is membership. This entitles the member, which can be either in the form of a 'Business Member' (\$55 per year) available to licensed businesses or 'Gold-Star Members' available to individual members of the public (\$60 per year) to shop at any Costco store worldwide.

Costco Warehouse

Costco typically operates from traditional purpose built retail warehouse buildings. These generally comprise large retail floor plates and 600+ on site car spaces. The Costco Warehouse model also generally comprises a number of ancillary uses/ services within its premises. These comprise:

- Small cafe - this is referred to as a 'food court' within the Costco model, however it generally involves an indoor seating area and sells a small range of convenience fast food, i.e. pizza, hot dogs, salads and cold beverages for consumption on the premises.
- Tyre centre - this comprises a drive-in tyre fittings and balancing facility;
- Optometrists - this involves the provision of a reception kiosk and examination rooms;
- Photo processing; and
- Hearing aid service/ sales.

Product Range

Costco offers a mix of high quality local and international brand name products. The product range is extremely wide, covering both food and non-food items and products are generally packaged in large bulk sizes or are of institutional quality. The total number of products carried within a typical store is approximately 4,000 as opposed to a traditional supermarket which carries approximately 30,000+ products, therefore whilst the range is wide ranging, the selection is limited within each category.

Products are generally received on pre-packed pallets, which are then transported to the specific product areas within the store, where they are displayed (refer to Figure 1 below).

The general product range comprises:

- groceries (including butchery and bakery)
- liquor
- appliances
- televisions and media
- automotive supplies
- toys
- hardware
- sporting goods
- office supplies and office equipment
- jewellery
- watches
- cameras
- books
- homewares
- apparel
- health and beauty aids
- furniture

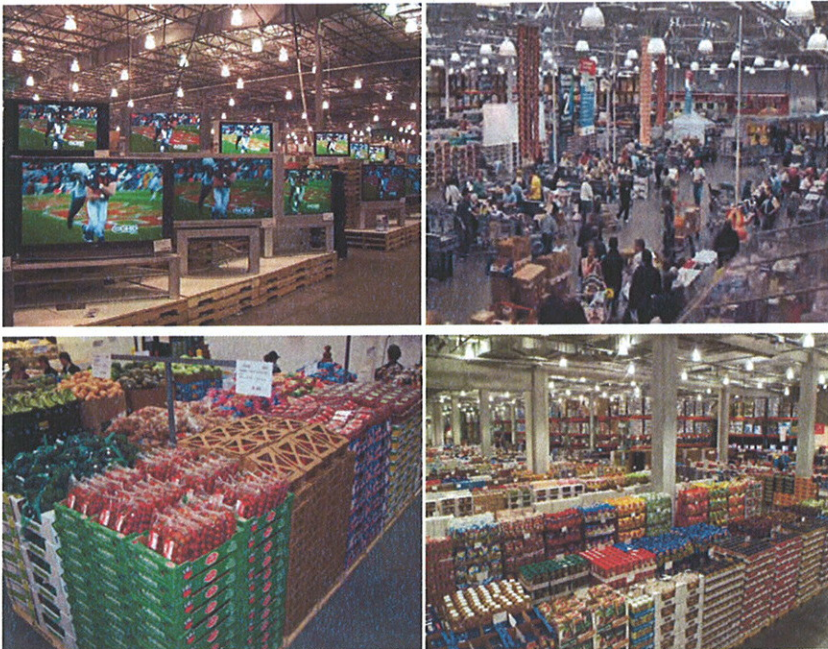


Figure 1 – Examples of typical product displays and floor layout

2.0 Site Analysis

2.1 Site Location and Context

The Site is located within the Crossroads, Casula. The Crossroads precinct is a triangular shaped site, situated approximately 6km south-west of Liverpool CBD. It is bound by the South Western Motorway (M5) to the west, Camden Valley Way to the north, and Campbelltown Road to the south-east.

The Site's locational context is shown at **Figure 2** and an aerial photograph of the Site is included in **Figure 3**.

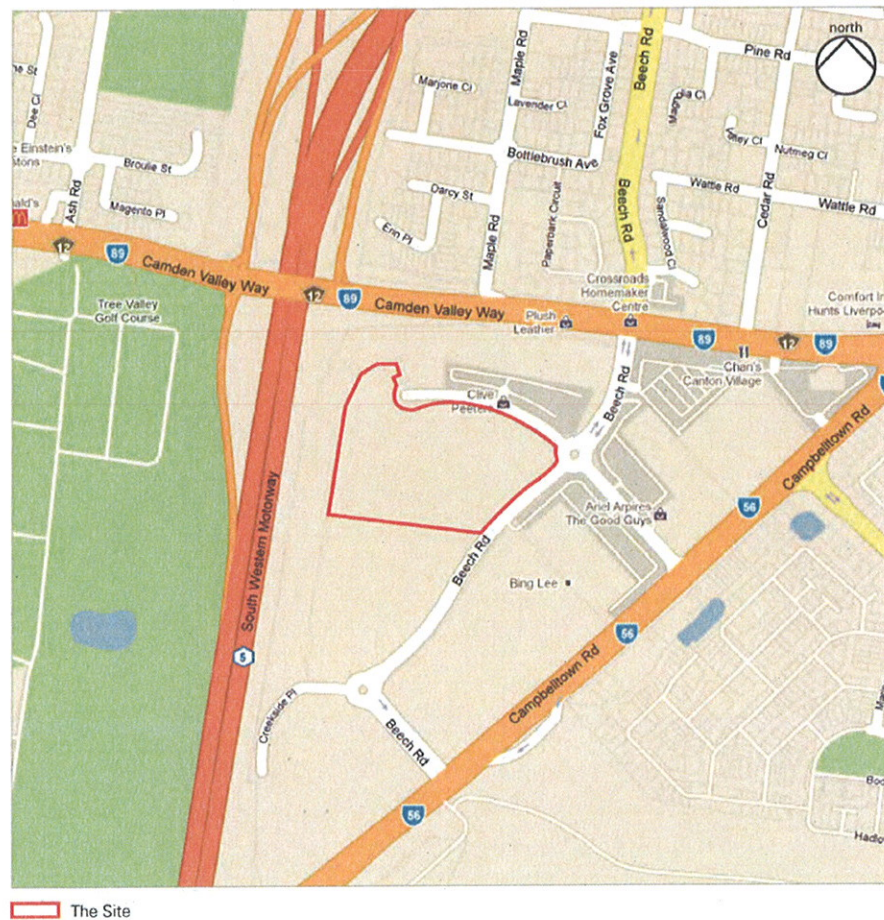


Figure 2 – Site location plan



 The Site

Figure 3 – Aerial photograph

2.2 Site Description

The Site, the subject of this Planning Proposal is situated within the north-western part of the Crossroads precinct. The Site is irregular in shape, it covers an area of approximately 59,910m² and is bounded by Parkers Farm Place to the north, Beech Road to the east, and a vegetated riparian corridor and Maxwells Creek (alongside the M5 motorway) to the west.

The Site is currently owned by AMP Crossroads Pty Ltd and is legally described as Part Lot 200 in DP 1090110.

As shown in Figures 4 and 5, the Site is currently vacant, relatively flat and comprises only small shrubs and grasses.



Figure 4 – View of the Site from Beech Road looking north west



Figure 5 – View of the Site from Parkers Farm Place looking south west

2.3 Surrounding Development

A retail/ bulky goods development, collectively known as the Crossroads Homemaker Centre is situated to the north, north-east and east of the Site.

Figure 6 illustrates the existing warehouse development and the current tenants within the units. A view of the retail/ bulky goods development to the north of the Site is provided in **Figure 7**.

Beyond the Crossroads Homemaker Centre, medium density residential development is located to the north, and low density residential development is located to the south-east and west. It is noted however, that the land to the west of the M5 motorway is known as the Edmondson Park Release Area. Edmondson Park forms part of the South Western Growth Centre and is planned for approximately 7,500 new residential lots.



Figure 6 – Crossroads Homemaker Centre Layout (source: www.crossroadshomemaker.com.au)



Figure 7 – View of Retail/ Bulky Goods Warehouse development to the north of the Site

3.0 Current Planning Controls

3.1 Liverpool LEP 2008

Liverpool LEP 2008 is the principal planning instrument currently applying to the Site. The key controls applying to the Site are shown in the following table and the current zoning map is shown in **Figure 8** below.

Table 1 – Summary of key existing planning controls

Liverpool LEP 2008 – Key Planning Controls	
Zoning	B5 Business Development
Permissible uses	Permissible uses include but are not limited to bulky goods premises; car parks; food and drink premises; landscape and garden supplies; office premises; restaurants; vehicles sales or hire premises; and warehouse or distribution centres. A Costco Warehouse development would be defined ' <i>retail premises</i> ' ¹ , ' <i>business premises</i> ' ² , ' <i>vehicle repair station</i> ' ³ and ' <i>service station</i> ' ⁴ which are not permissible within the B5 zone.
Minimum lot size	2000m ²
Height of buildings	30m
FSR limit	0.75:1
Flood planning	Part of the Site is identified as being flood prone land.

¹ **retail premises** means a building or place used for the purpose of selling items by retail, or for hiring or displaying items for the purpose of selling them by retail or hiring them out, whether the items are goods or materials (or whether also sold by wholesale).

² **business premises** means a building or place at or on which:

- (a) an occupation, profession or trade (other than an industry) is carried out on for the provision of services directly to members of the public on a regular basis, or
- (b) a service is provided directly to members of the public on a regular basis.

³ **vehicle repair station** means a building or place for the purpose of carrying out repairs or the selling of, and fitting of accessories to, vehicles or agricultural machinery, but does not include a vehicle body repair workshop.

⁴ **service station** means a building or place for the sale by retail of fuels and lubricants for motor vehicles, whether or not the building or place is also used for any one or more of the following:

- (a) the ancillary sale by retail of spare parts and accessories for motor vehicles,
- (b) the cleaning of motor vehicles,
- (c) installation of accessories,
- (d) inspecting, repairing and servicing of motor vehicles (other than body building, panel beating, spray painting, or chassis restoration),
- (e) the ancillary retail selling or hiring of general merchandise or services or both.

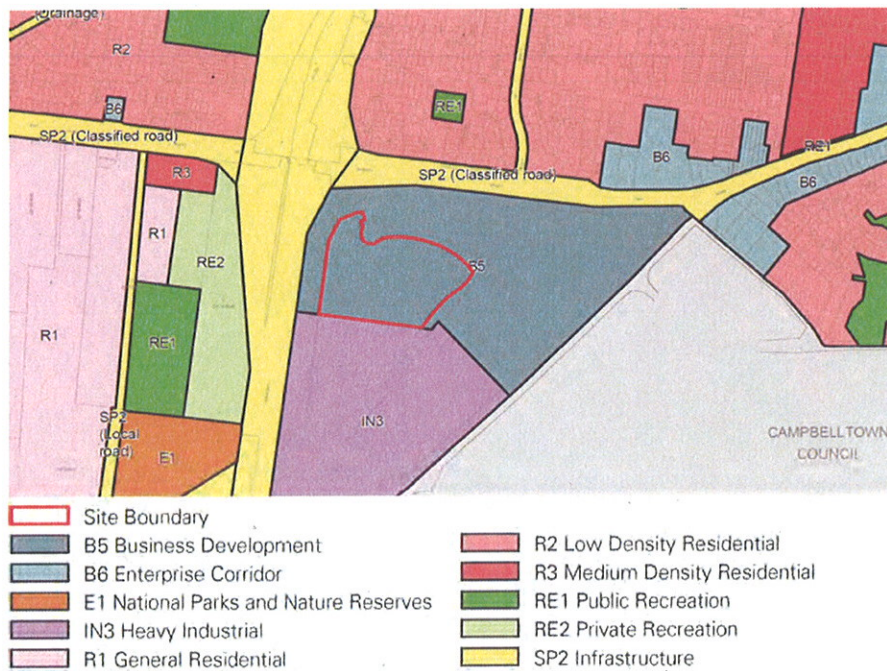


Figure 8 – Current zoning in Liverpool LEP 2008

4.0 Planning Proposal

The following section is structured generally in accordance with the document *A guide to preparing planning proposals* (DoP, 2009) as follows:

- Objectives and intended outcomes.
- Explanation of provisions.
- Justification:
 - need for the planning proposed;
 - relationship to strategic planning framework;
 - environmental, social and economic impact;
 - State and Commonwealth interests.
- Community Consultation.

4.1 Objectives and Intended Outcomes

The Planning Proposal is to make a Site specific LEP at Crossroads, Casula, to identify specific development that may be carried out with consent through an amendment to Schedule 1 of the Liverpool LEP 2008.

The Costco business model is that of a 'retail warehouse' which is not recognised as an individual form of development under the Standard Instrument definitions. As identified in Section 3.1, a Costco Warehouse would be defined as a mix of 'retail premises', 'business premises', 'vehicle repair station' and 'service station' uses under the Liverpool LEP 2008. These uses are currently not permissible within the B5 zone.

The objective of this Planning Proposal is to permit retail premises, business premises, vehicle repair station and service station uses on the Site, subject to specific site and operational criteria. The intended outcome of the Planning Proposal is to facilitate the viable and timely redevelopment of the Site for a well designed Costco Warehouse.

The site specific LEP will define the land to which it applies and define the parameters for the development.

4.2 Explanation of Provisions

This section provides an explanation of the proposed provisions of the site specific LEP. Terms used in this description have the same meaning as in the EP&A Act, the Liverpool LEP 2008 and Standard Instrument.

4.2.1 Land to which the Plan will Apply

Figure 8 identifies the land that is proposed to be included in the site specific LEP. It is legally described as Part Lot 200 in DP 1090110.

4.2.2 Savings Provisions

It is not considered necessary to include a savings provision.

4.2.3 Relationship to Existing Local Planning Instruments

It is proposed that Liverpool LEP 2008, will continue to apply and will be amended by the site specific LEP. It is considered appropriate that the provisions for the Site be incorporated within an amending LEP to Liverpool LEP 2008.

4.2.4 Development for Certain Additional Purposes

An amendment to Schedule 1 of the Liverpool LEP 2008 is sought. The amending LEP will insert the following at the end of Schedule 1:

Use of certain land at Crossroads in Zone B5

(1) This clause applies to Part Lot 200 in DP 1090110 in Zone B5 Business Development at Crossroads in the following location:

- (a) south of Parkers Farm Place; and*
- (b) west of Beech Road.*

(2) Development for retail premises, business premises, vehicle repair station and service station uses permitted with consent where:

- (a) the retail premises is located on land within a minimum site area of 20,000m²;*
- (b) the retail premises has a minimum gross floor area of 13,000m²; and*
- (c) the retail premises is operated by one retailer and/ or tenant only.*

In addition, further to the findings of a preliminary flood assessment (**Appendix B**) and confirmation from Council's Engineers (refer to Section 4.4.1) that the Site is not flood affected it is requested that an amendment to the extent of the Flood planning area and Flood prone land on Flood Planning Map 13.

4.2.5 Exempt and Complying Development

State Environmental Planning Policy (Exempt and Complying Development Codes) 2009, State Environmental Planning Policy (Infrastructure 2007) and State Environmental Planning Policy No 64 (Advertising and Signage) apply and will continue to apply to the Site, establishing a range of exempt and complying development.

It is proposed that no further exempt and complying development provisions be incorporated within the amending LEP at this stage.

4.3 Justification

4.3.1 Need for the Planning Proposal

The Department of Planning document *A guide to preparing planning proposals* includes the following questions in describing the need for the Planning Proposal.

Is the Planning Proposal a result of any strategic study or report?

This Planning Proposal is not the result of a strategic study or report. The need for the proposed LEP amendment has arisen due to Costco's identification of the Site, as a site which meets their criteria for a future Costco Warehouse.

Is the Planning Proposal the best means of achieving the objective?

The purpose of the site specific LEP is to identify specific development that may be carried out with consent on the Site through an amendment to Schedule 1 of the Liverpool LEP 2008.

There are two options available to achieve the proposal as follows:

- Amendment to Schedule 1 - Additional permitted uses in the Liverpool LEP 2008 to include a site specific clause allowing the proposed use (as proposed above); and
- Amendment to the B5 zone land use table in the Liverpool LEP 2008 to allow for 'retail premises' to be permissible within the zone (not proposed).

It is considered, that the first option of a site specific clause and amendment to Schedule 1 of the Liverpool LEP 2008 is the best means of achieving the intended outcome. The concept of the 'retail warehouse' is not recognised as an individual form of development under the Standard Instrument definitions, therefore the site specific clause will define the parameters for retail warehouse development on the Site and is the most practical way to facilitate the future development of a Costco Warehouse.

Is there a nett community benefit?

The Economic Impact Assessment, prepared by Essential Economics (**Appendix A**) presents an assessment of the effects of the new Costco Warehouse on nett community benefit. In summary, the proposed site specific LEP will result in a nett community benefit by facilitating a new development which will generate a number of social and economic benefits for the local area. These comprise:

- provision of a new form of retailing which offers high quality merchandise for approximately 25% less than the price of the same products purchased from competing retailers;
- small businesses can purchase wholesale goods at low prices, with sufficient opportunity to resell those goods at prices which are competitive with supermarkets;
- the introduction of Costco at Crossroads will assist in lifting the performance of the existing cluster of bulky goods uses, which currently has a high vacancy rate;
- the introduction of Costco contributes to choice and competition in the broader retail and wholesale markets which will in turn provide benefits in the form of price savings, and the ability to purchase products in bulk packaging;
- the Costco Warehouse is expected to generate approximately 330 employment positions which is the equivalent of 250 estimated full time (EFT) positions. The majority of these jobs are expected to be within the Liverpool LGA;
- a further 225 indirect or flow-on jobs are expected to be created indirectly through the employment multiplier effect within Sydney, other parts of NSW and interstate; and
- an injection of approximately \$35 million into the local economy through the construction of the Costco Warehouse and would create approximately 80 construction jobs over a 12 month construction phase, plus a further 130 indirect or flow-on jobs elsewhere in the economy.

4.3.2 Relationship with Strategic Planning Framework

Metropolitan Plan for Sydney 2036

The Metropolitan Plan for Sydney 2036 (Metropolitan Plan) was published in December 2010 and is an integrated, long-term planning framework which seeks to sustainably manage Sydney's growth and strengthen its economic development to 2036, while enhancing its unique lifestyle, heritage and environment.

Within the Plan, the Site is identified as an existing Neighbourhood Centre and existing zoned Employment land. **Table 2** demonstrates the consistency of the proposed development with the key actions within the 'Growing and Renewing Centres' (Strategic Direction B) and 'Growing Sydney's Economy' (Strategic Direction E) chapters.

Table 2 – Consistency with Metropolitan Plan for Sydney 2036

Objective	Response
B1 Focus activity in accessible centres <i>- "Retailing which requires large floor areas... cannot always be readily accommodated in existing centres... The B5 Business Development Zone is generally an appropriate zone in which to cluster this kind of development".</i>	The Site is located within the B5 Business Zone. Costco's business model shares many structural and operational characteristics with bulky goods retailing, which is permissible on the Site. The proposed development is therefore considered to be appropriate within the proposed location.
B2 Strengthen major and specialised centres to support sustainable growth of the city.	Whilst the Site is not located within a Major Centre or Specialised Centre, it is considered to be within an Activity Centre, as discussed below. Further, as demonstrated in the sequential site assessment at Appendix A , there are no suitable alternative sites within nearby major or specialised centres. In addition it is considered that the Costco warehouse development will strengthen the existing Crossroads precinct.
B3 Plan for new centres and instigate a program for high quality urban renewal in existing centres serviced by public transport.	A Costco Warehouse within the Homemaker Centre will act as a catalyst for visitors and future tenants to the Crossroads Homemaker Centre, which is currently considered to be under performing and includes a number of vacant units.
E1 Ensure adequate land supply for economic activity, investment and jobs in the right locations	The inclusion of additional permitted uses specific to the Site will not significantly impact upon the land supply for economic activity and investment. Indeed, it is likely to stimulate tenant interest in the Crossroads precinct and provide 250 EFT jobs plus another 225 additional in-direct jobs. Notwithstanding this and as discussed below, it is considered that the land is unlikely to be suitable for traditional industrial uses, as encouraged by the sub-regional strategy and the Planning Proposal will not lead to a reduction in employment opportunities within the Precinct.
E2 Focus Sydney's economic growth and renewal, employment and education in centres	The Planning Proposal is specific to the Site, which is located within an existing centre. The Planning Proposal will therefore ensure that the economic growth generated by a Costco Warehouse will be located within an existing centre.
E5 Increase and diversify the jobs and skills base of Western Sydney	The development of a Costco Warehouse provides a variety of job opportunities within approximately 250 full time equivalent jobs within the south-western sub-region.

Draft South-West Subregional Strategy, December 2007

The Site is within the area covered by the draft South-West Subregional Strategy. The Strategy includes the following provisions relevant to the Site and proposal:

- Crossroads is identified as existing employment land, adjacent to a major road/freeway (M5) and planned south-west rail link.
- Crossroads is identified as land to be retained for industrial purposes, particularly, for freight and logistics and bulky goods.
- The Strategy resists the expansion of bulky goods uses at Crossroads as it considered that it would potentially alienate industrial land uses, however notes that whilst a third of the land has been developed with bulky goods retailing, the remainder is vacant.
- Retail Activity is encouraged to be concentrated in Business Development Zones and Enterprise Corridors.

In considering the provisions of the draft South-West sub-regional strategy the Planning Proposal is acceptable in the following respects:

- The Planning Proposal seeks to extend the range of permissible uses on the Site to include retail premises (subject to specific controls) to specifically enable a Costco Warehouse development to be constructed on the Site. A Costco Warehouse development has many similarities with typical bulky goods retail units and is considered an appropriate use on the Site.
- Whilst the strategy resists the expansion of bulky goods uses at Crossroads, and seeks to encourage industrial, freight and logistics uses, the available sites at Crossroads remain vacant, which indicates that there is little market demand for the vacant sites for these type of uses. Furthermore, as discussed below a sequential assessment of alternative sites has been undertaken (refer to **Appendix A**) and has found that no alternative sites are available or suitable for a Costco development within surrounding centres.
- Despite the strategy resisting further retail specifically at Crossroads, it acknowledges that retail activity is an appropriate use within a B5 Business Development zone.

Draft NSW Activity Centres Policy May 2010

The Draft NSW Activity Centres Policy (Activity Centres Policy) was circulated for consultation in May 2010 by the NSW Department of Planning. Amongst other things, the Activity Centres Policy provides guidance on how it should be applied in relation to 'spot-rezonings'. In particular the key considerations which are to be taken into account are:

- *The Sequential Test - to be applied when assessing edge-of-centre or out-of-centre proposals to ascertain whether the development can be located in existing or new activity centres;*
- *When there is no sufficient zoned land available to meet projected demand, there will be a presumption in favour of rezoning more land to meet the demand;*
- *Council's to consider the Site Suitability Criteria when assessing merits of proposed rezoning proposals;*

- *When a planning proposal is submitted to the Department of Planning, which makes strategic changes to a planned or existing activity centre, an assessment should be made of the proposal as part of the LEP 'Gateway' process. If the rezoning proposal is permitted through the Gateway, the process will be commenced to amend the LEP to permit the use on the Site. If the zoning is changed to permit the use, the development proposal will be assessed on its merits.*

In regard to the above considerations, this Planning Proposal is consistent with the Draft Activity Centres Policy in the following respects:

1. The Site is considered to be within an existing Activity Centre.
2. Given the Crossroads Precinct is described as a bulky-goods specialist centre (within the Liverpool City Retail Centres Hierarchy Review, dated December 2009), and further retail at Crossroads is resisted within the south-western sub-regional strategy, a sequential assessment has been undertaken by Essential Economics (**Appendix A**). This is further discussed in Section 4.4.3.
3. The Planning Proposal is consistent with the six key principles of the Activity Centres Policy (Refer to **Table 3**).
4. The Site is suitable for the development (refer to **Table 4**).

Table 3 – Consistency with the Key Principles

Key Principle		Planning Proposal
1	Commercial development should be located in activity centres.	Crossroads is considered to be an existing Activity Centre, therefore the Planning Proposal is consistent with this Principle in that it seeks to provide additional retail activity within an existing activity centre.
2	Activity centres should be able to grow and new activity centres to form in a manner that is consistent with relevant up to date regional or sub-regional strategies.	The Activity Centres Policy recognises that the planning system should be flexible enough to allow activity centres to grow over time to meet market demand. In accordance with this Principle, the Planning Proposal seeks to utilise the existing Site, which has been vacant for at least 10 years, for a Costco warehouse development. There will remain land for future development and the existing Crossroads precinct contains a number of vacant unity to cater for future demand by other retailers.
3	Market determines need for development.	The proposed Site meets Costco's requirements for future development. The Planning Proposal is consistent with the Principle as it will support development opportunity and ensure sound planning outcomes for the wider community.
4	The supply of development should accommodate market demand.	This Planning Proposal will strengthen Costco's position within Sydney's retail market and will meet their demand for land within the south-western part of the metropolitan area.
5	Activity centres should support a range of uses and contribute to a competitive market.	The provision of a Costco Warehouse development within the Liverpool LGA, will introduce more competition between retailers, however as demonstrated within the Essential Economics Report (Appendix A), it is not expected to significantly reduce sales within any nearby retail centres.
6	Activity centres should be well designed, sustainable and integrated with surrounding uses.	The Planning Proposal will facilitate the provision of a Costco Warehouse development which will be well designed to integrate with the surrounding bulky goods retail uses and will comprise a number of sustainable design initiatives.

Table 4 – Suitability of the Site for the Planning Proposal

Site Suitability Criteria		Planning Proposal
a	Strategy consistent: is the proposed use of the Site consistent with or implementing the relevant regional, sub-regional or local strategy?	The proposed use of the Site, is consistent with the Metropolitan Plan and draft South-West subregional strategy as demonstrated in Table 2 and discussed above.
b	Infrastructure: capacity to support future demands, e.g. traffic capacity, sewerage and water services.	The Planning Proposal would not likely impact upon the surrounding road network as discussed in Section 4.4.2. Furthermore, the Site is or can be suitably serviced to meet the demand of the future Costco Warehouse development. Specific consideration of any necessary upgrades will be undertaken during the preparation of the DA.
c	Access considerations: ▪ good public transport and road access for employees, customers and suppliers; ▪ good pedestrian access. If not, are arrangements in place for these to be provided.	The Site has excellent road access for employees, customers and suppliers. However, the Crossroads Precinct is surrounded by major roads and as a result does not have good pedestrian access. Furthermore, we are not aware of any bus services which enter the Crossroads precinct, however there is a bus stop located on Camden Valley Way.
d	Urban design opportunities: potential to: ▪ integrate with surrounding land uses; ▪ increase the amenity of the local area.	The Planning Proposal will facilitate the development of a new Costco Warehouse, which will integrate well with the surrounding bulky goods retail uses.
e	Competing land issues: impact on: ▪ housing supply and affordability; ▪ industrial land supply; ▪ on choice and competition in the locality.	The Planning Proposal seeks to add an additional use to the permitted uses on the Site. Whilst the Site is zoned B5 Business Development, whereby the draft south-west sub-regional strategy seeks the land to be retained for industrial uses, the Site has been vacant for at least 10 years, therefore it is considered that the industrial market does not consider this Site to be a prime site. Furthermore, the industrial developments at the M7 Interchange and Hoxton Park, has fundamentally changed the market demand for industrial land within the area. The Planning Proposal will not however, remove the industrial zoning and would not preclude industrial uses being built on the Site in the future.
f	Proximity to labour markets and associated housing (jobs closer to home): ▪ for workers with required skills; ▪ for management.	It is anticipated that the majority of the future employees both managers and workers will be from within the LGA
g	Environmental considerations: ▪ hazards, such as flooding, bushfire, or coastal, contaminated land. ▪ opportunities to contribute positively to environmental outcomes.	It is not anticipated that the Site is subject to any environmental hazards. Whilst the Council's flooding maps show that part of the Site is flood affected, as discussed in Section 4.4.1, the Site levels are above the 1% AEP and PMF levels, therefore as part of this Planning Proposal we seek the flood maps be amended accordingly as part of this draft LEP.
h	Public benefit considerations: ▪ provides a broader public benefit from being located at the alternative site.	The Planning Proposal will provide public benefit as discussed in Section 4.3.1.

Liverpool City Retail Centres Hierarchy Review, December 2006

In December 2006, Leyshon Consulting Pty Ltd prepared a report for Liverpool City Council which presented a review of the retail centres hierarchy in the Liverpool LGA and provided advice to Council to inform the preparation of the comprehensive LEP on a range of planning issues associated with retail centres within the LGA.

The report outlined that within the Liverpool LGA up to 2031 the theoretical demand for additional retail floorspace would be 350,592m², the demand for additional supermarket floorspace would be 72,592 m² (equivalent to 23 supermarkets) and the demand for additional bulky goods type floorspace to be up to 155,808m².

Whilst we acknowledge that since 2006, a number of retail developments would have come forward to meet part of the estimated retail demand, it is considered that sufficient demand would still exist to support a 13,500m² Costco Warehouse as facilitated by this Planning Proposal.

Furthermore, Leyshon Consulting considered that the Crossroads precinct would be suitable to accommodate the projected increase in bulky goods floorspace demand for the following reasons:

- *The land referred to above at the Crossroads (i.e. the industrial zoned land) is unlikely to be suitable for traditional industrial uses given the nature of existing development on the northern portion of the land.*
- *Any loss of employment land in this location is likely to be compensated for by the creation of new employment zones close to the M7 corridor.*
- *The development of the subject land for bulky goods rather than industrial uses will not lead to a reduction in employment opportunities at the Crossroads.*

We concur with Leyshons arguments for the provision of additional bulky goods retailing at the Crossroads precinct, and consider that the same arguments apply to the provision of a Costco Warehouse on the Site. As explained at Section 1.1 and Section 4.1, the Costco business model is that of a 'retail warehouse' which is not recognised as an individual form of development under the Standard Instrument definitions. Whilst Costco cannot be properly characterised as 'Bulky Goods Retailing' the Costco Warehouse model shares many structural and operational characteristics with bulky goods retailing but equally cannot be considered to solely be a traditional retail centre development.

Table 5 below is a replication of a publication entitled 'Retail Format Comparison' prepared by the Bulky Goods Retailers Association. We have reproduced it below to have added a further comparison with Costco's business model.

It is considered therefore that the Planning Proposal is in accordance with Leyshons recommendations for the Liverpool LGA, based on the fact that the future Costco development will meet part of the identified demand for retail floorspace within the LGA and also the Site is considered to be a suitable location for this form of development.

Table 5 – Retail format comparison

	Bulky Goods Showroom	Core Retailing	Costco
Location	▪ Close proximity to activity centres generally on edge or outside of activity centres due to permissibility of bulky goods showrooms in lower priority land zonings ▪ Generally located on major arterial roads due to exposure to passing traffic, accessibility for customers by car and public transport	▪ Centrally within principal activity centres due to restrictions on retail uses outside of highest priority land zonings	▪ Located on edge or outside of town/ city retail centres. ▪ Located with major arterial road access, due to exposure, passing traffic and accessibility for customers.
Merchandise	▪ Generally large items in terms of size, shape and weight	▪ Generally small items in terms of size, shape and weight	▪ Mix of large and small items ▪ Small items are generally sold in bulk
Products	▪ Generally 'homemaker' products including furniture, electrical, furnishings, bedding, building materials, household fixtures and fittings	▪ Generally 'everyday needs' products principally including food and clothing, general retail products and services	▪ 'Homemaker' products such furniture, appliances, televisions and media products, hardware and tools, automotive supplies, bedding and office equipment ▪ Staple 'everyday needs' goods such as food and drink (generally bulk packaged) and health and beauty aids ▪ Additional product lines such as camera's jewellery, books, sports goods.
Display Requirements	▪ Large floor plates required for the storage, handling and display of bulky items ▪ Typical tenancy area of 1,000 - 3,500 m² for major tenants and 300 - 500 m² for minor tenants ▪ Typical ceiling height of 4.5 - 6.0 m for storage and display of products in industrial racking	▪ Small floor plates for majority of tenants ▪ Typical tenancy area of 80 - 120m² for the majority of tenants ▪ Typical tenancy area of 3,500 - 5,000m² for major anchor tenants within shopping centres (include super markets and department stores) ▪ Typical ceiling height of 3.0 - 3.6m for display of products in standard shop fittings	▪ Large floor plate required ▪ Typical retail GFA of between 13,500m² and 14,900m² in a 1 storey freestanding warehouse building ▪ Typical ceiling height of 7m in main sales floor ▪ Display of products in tall steel racking and on pallets
Customer Visitation	▪ Infrequent/ destination trip ▪ Considered capital investment ▪ Low volume of average customers per day ▪ Generally short period of stay for sole purpose of acquiring goods	▪ Frequent/ impulse trip ▪ Everyday needs ▪ High volume of average customers per day on average 3 - 4 times the population density of bulky goods showrooms ▪ Generally longer period of stay associated with lifestyle shopping, leisure, dining and entertainment facilities provided within shopping centres	▪ Business members will shop frequently ▪ Individual members will generally shop once or twice per month for grocery items ▪ Infrequent/ destination trips for larger 'homeware' items ▪ As a membership retailer, impulse buying is less typical

	Bulky Goods Showroom	Core Retailing	Costco
Trading Patterns	▪ Generally higher ticket value per average sale than core retailing ▪ Low average turnover per m² of floor area	▪ Generally lower ticket value per average sale than bulky goods showroom ▪ High average turnover per m² of floor area	▪ Higher ticket value per average sale
Built Form	▪ Large floor plates ▪ Non-active frontages due to large floor plates and coarse-grain subdivision pattern ▪ Primarily outdoor environment for public circulation	▪ Small floor plates ▪ Active frontages due to small floor plates and fine grain subdivision pattern ▪ Primarily indoor environment for public circulation with the exception of traditional 'street' or 'strip' based retailing	▪ Large floor plates ▪ Non-active frontages
Loading & Goods Handling Requirements	▪ Deliveries to majority of tenants by semi-trailers and large trucks ▪ Direct access to rear of tenancy for unloading of bulky goods and storage within tenancy ▪ Direct access for collection of bulky goods after purchase by customers for loading into their vehicles	▪ Deliveries to major tenants only by semi-trailers and large trucks ▪ Delivery to the majority of small tenants by small trucks and vans ▪ Direct access for loading to major tenants only. Majority of small tenants transfer goods via service corridors or public mall ▪ Primarily cash and carry	▪ Deliveries by semi-trailers and large trucks ▪ Direct access for unloading
Car Parking	▪ 2.5 - 3.0 car spaces per 100 m² of floor area	▪ 5.0 - 8.0 car spaces per 100 m² of floor area	5.4 car spaces per 100m ² retail GFA
Rent	▪ Low- Medium rent per annum	▪ High rent per annum	Low - Medium rent per annum
Outgoings	▪ Low outgoing	▪ High outgoing	Low outgoing

Source: Retail Format Comparison, Bulky Goods Retailers & Association www.bulkygoodsretailers.com.au (amended by JBA)

State Environmental Planning Policies

The following State Environmental Planning Policies are relevant to the Planning Proposal (Table 6):

Table 6 – Compliance with relevant SEPPs

SEPP	Requirement	Planning Proposal	Comply
SEPP (Infrastructure) 2007	The relevant matters for consideration include the requirement to refer a Development Application to the RT on the basis that the future development will be greater than 2,000m ² and provide parking for 200 or more vehicles.	As discussed below, detailed traffic modelling and assessment will be undertaken for the future development application and the development will be referred to the RTA at that time.	✓
SEPP (Major Development) 2005	The Major Development SEE specifies that for any development over \$10,000,000 the regional panel may exercise the functions of the consent authority.	The future development of the Site will be referred to the Joint Regional Planning Panel for determination.	✓

Ministerial Directions.

The S117 Directions issued by the Minister for Planning on the preparation of Local Environmental Plans that are relevant to the Planning Proposal lodged under the LEP Gateway are addressed in **Table 7** below.

Table 7 – Compliance with relevant Section 117 Directions

S117 Direction No. and Title	Contents of S117 Direction	Planning Proposal	Comply
1.1 Business and Industrial Zones	A draft LEP is required, inter alia, to be consistent with the objectives of the direction, retail the areas and location of existing business and industrial zones.	The Planning Proposal is consistent with the objectives of the direction in that it will facilitate the development of a new Costco Warehouse which will provide approximately 250 equivalent full time jobs, will support the existing precinct at Crossroads and act as a catalyst to improve the precincts current performance. In addition the Planning Proposal seeks to retain the existing business zoning.	✓
3.4 Integrating Land Use and Transport	A Planning Proposal must be consistent with the DUAP publications "Improving Transport Choice" and "The Right place for Business and Services".	It is acknowledged that the documents seek new development to be within traditional retail centres and close to public transport nodes. As discussed above, a sequential site assessment of alternative sites has been undertaken (refer to Section 4.4.3) which has found that no alternative sites within a sequentially preferable location are available or are suitable for a Costco warehouse development. Furthermore, it is demonstrated above that the Costco business model is akin the bulky goods warehouse retailing format and therefore considered to acceptable is the proposed location as it adjacent to a key transport corridor and will be compatible with the surrounding land uses providing the opportunity for linked trips.	✓
4.3 Flood Prone Land	Planning proposals must be consistent with the NSW Government's Flood Prone Policy and the principles of the Floodplain Development Manual 2005, and ensure the provisions of an LEP on flood land is commensurate with flood hazard and include consideration of the potential flood impacts both on and off the subject land.	The Mott MacDonald Hughes Trueman have undertaken a preliminary investigation of the flood impacts and concluded that the Site is not flood affected.	✓
5.1 Implementation of Regional Strategies	The objective of this direction is to give legal effect to the vision, land use strategy, policies, outcomes and actions contained in regional strategies.	As previously discussed, the Planning Proposal is generally consistent with the Draft South-West Subregional Strategy.	✓
6.3 Site Specific Provisions	The objective of this direction is to discourage unnecessarily restrictive site specific planning controls.	The Planning Proposal is responsive to the Costco development as a land use and accordingly provides site specific controls relating to the scale and operation of the development. These however are not considered to the unnecessarily restrictive.	✓
7.1 Implementation of the Metropolitan Plan for Sydney 2036	The objective of this direction is to give legal effect to the vision, transport and land use strategy, policies, outcomes and actions contained in the Metropolitan Plan for Sydney 2036.	As previously discussed, the Planning Proposal is consistent with the Metropolitan Plan.	✓

4.4 Environmental, Social and Economic Impact

4.4.1 Flood Impact

The Liverpool LEP 2008, identifies the western section of the Site as being Flood Prone Land. In light of this, Mott MacDonald Hughes Trueman (MMHT) have undertaken a preliminary investigation of the stormwater drainage on the Site and assessed the potential for flood impacts. The preliminary flood assessment is included at **Appendix B**.

As part of their research work, MMHT obtained the following flood levels for Maxwells Creek which is located adjacent to the western boundary of the Site:

Table 8 – Councils flood levels for Maxwells Creek

Flood Level	Northern end of the creek	Southern end of the creek
Q100	RL 35.0	RL 36.3
PMF	RL37.1	RL 37.5

Survey information obtained by Stutchbury Jaques, however has subsequently confirmed that the western boundary of the Site has the following Site levels:

Table 9 – Existing Site levels

Part of the western boundary	Surveyed Site Level	Difference to Council's recorded Q100 level	Difference to Council's recorded PMF level
Northern	RL37.39	+ 2.39m	+ 1.09m
Southern	RL 38.67	+ 3.67m	+ 1.17m

Based upon the above information, it is considered that the Site will not be inundated in either a Q100 or PMF flood event and therefore is not flood affected. Given this outcome, it is requested that Council's flood prone map be amended to reflect that the Site is not flood affected.

4.4.2 Traffic and Access

Halcrow has undertaken a preliminary traffic assessment to assess the likely traffic implications of the development of a Costco Warehouse on the Site to support the Planning Proposal. The traffic report is included at **Appendix C**.

Existing Road Network

The existing road network within the vicinity of the Site comprises the following:

- **Beech Road**, a collector road which connects to Camden Valley Way to the north and consists of two lanes in each direction with a speed limit of 60 km/ hr.
- **Camden Valley Way**, an arterial road that runs east-west, is located to the north of the Site and connects to Hume Highway to the east. It is a divided road with two travel lanes in each direction and a speed limit of 70km/ hr.
- **Hume Highway**, the main east-west arterial road which provides access directly to Sydney CBD. It is generally divided with three lanes of travel in each direction and has a speed limit of 70km/ hr.

- **Campbelltown Road**, an arterial road that provides access to Campbelltown to the south and links to the Hume Highway to the north. It is generally divided with three lanes of travel in each direction and has a speed limit of 70km/ hr.
- **M5 South Western Motorway**, a main arterial road joins the M7 Westlink Motorway to the north of the Site, and then runs alongside the western site boundary. It provides direct access to the Sydney CBD to the north east and is divided with two lanes of travel in each direction and a speed limit of 100km/ hr.
- **M7 Westlink Motorway**, an arterial road links to the M5 Southern Motorway to the north of the Site. the road is fully divided with two travel lanes in each direction and a speed limit of 100km/ hr.
- **Glenfield Road**, a collector road located to the east of the Site and provides access to the nearby suburb of Glenfield. It consists of one travel lane in each direction and a variable speed limit of up to 60 km/ hr.

Halcrow consider that that the road network within the Crossroads precinct and the connections onto the wider road network have been designed to accommodate higher levels of traffic.

Traffic Generation

In order to estimate the likely impact of a Costco Warehouse on traffic generation within the surrounding road network, Halcrow undertook intersection turning movement counts, during a Thursday evening peak in March 2010 for the intersections mentioned above. **Table 10** illustrates the peak hour traffic flows at the intersections.

Table 10 – Existing peak hour flows

Location	Thursday Evening Peak
Camden Valley Way, east of Beech Road	3,050
Beech Road, north of Camden Valley Way	1,250
Site access, south of Camden Valley Way	660
Hume Highway, east of Campbelltown	3,300
Campbelltown Road, south of Hume Highway	2,950
Glenfield Road, East of Campbelltown Road	1,390

RTA's *Guide to Traffic Generating Development* (Oct 2002) does not contain trip data for a retail model, such as Costco. In order to determine trip generation rates for the proposed development, Halcrow collected trip generation data from the RTA in regard to bulky goods retail stores, the U.S. Institute of Transportation Engineers Trip Generation Handbook (ITE) and existing Costco stores operating in the UK. In considering all the data collected, in accordance with the modelling undertaken for the Costco application at Auburn, it was determined that the ITE trip rates would be used. The predicted traffic generated by a Costco store on the Site were then calculated to be:

Table 11 – Predicted peak hour trip generation

	Arrivals	Departures	Total
Weekday Trip rate	2.51	2.61	5.12
Saturday Trip rate	3.45	3.18	6.63
Weekday No. of Vehicles	364	378	742
Saturday No. of vehicles	500	461	961

In light of the above figures, and their observations of the surrounding road network, Halcrow, consider that the Planning Proposal would be unlikely to have a significant impact on the road network. Furthermore, intersection improvements (if required following traffic modelling at the DA stage) would only likely be required to the connections onto the wider road network, where additional lanes may be necessary and the internal intersection at Beech Road/ Parkers Farm Place may need to be changed to a traffic signal.

4.4.3 Economic Impact

An Economic Impact Assessment has been prepared by Essential Economics (**Appendix A**). The report presents an analysis of the potential economic impacts associated with the construction and operation of a Costco Warehouse on the Site, the subject of this Planning Proposal. In addition, the report presents the findings of a sequential site assessment which was undertaken in accordance with the Activity Centres Policy and provides an assessment of the net community benefits of a Costco Warehouse to the surrounding population.

Economic Impact

A Costco Warehouse on the Site is expected to serve a large retail trade area (**Figure 9**) which will generally extend to:

- Prospect Creek to the north;
- Holsworthy Military Reserve to the east;
- the townships of Yanderra and Buxton to the south; and
- the Blue Mountains National Park to the west.

The retail trade area has a projected population of 814,230 residents in 2013 (the anticipated 1st year of trading) which is forecast to increase to 926,650 in 2020. In 2010 the total spend of the retail trade area population total was \$8,730 million. Of which \$4,852 million was spent on food and \$3,544 million was spent on non-food goods (i.e. apparel, homewares, bulky goods etc). A further \$355 million was spent on additional retail services in the retail trade area.

Based on these figures the projected total spend at 2020 is expected to be \$11,943 million, which represents a very considerable increase in spending capacity over the next 10 years.

Essential Economics predicts that the proposed Costco Warehouse will generate sales of approximately \$120 million within their first year of trading (2013), and \$80.8 million (67%) would be drawn from residents within the retail trade area. Based on this presumption, Costco would achieve only a very small market share of 0.8% of the available spending in 2013 from residents within the retail trade area.

The trading impacts would result in the loss of sales within Liverpool CBD of approximately 2.8%, based on a very conservative estimate of impacts, however a more likely impact would be 1.4%. Across all centres within the Liverpool LGA, impacts are expected to average a loss of 1.0% of turnover and impacts on other centres within the retail trade area are expected to be even lower.

Importantly, Essential Economics notes that the analysis shows that due to the flow-on effect, Costco is likely to lead to a net gain in turnover performance of the existing retail premises at the Crossroads precinct. Furthermore, the initial positive impact has potential to further stimulate tenant interest in the precinct.

Overall, it is considered that even if the conservative figure of 2.8% is adopted, this is considered to be a very low impact and is not expected to lead to the loss of major tenants or a change in the role of each centre. Furthermore, we note, it is considerably less than the impacts of 10% to 15% that the Land and Environment Court of NSW has in the past noted as being significant enough to cause decline in the viability and ranges of services offered in an existing centre.

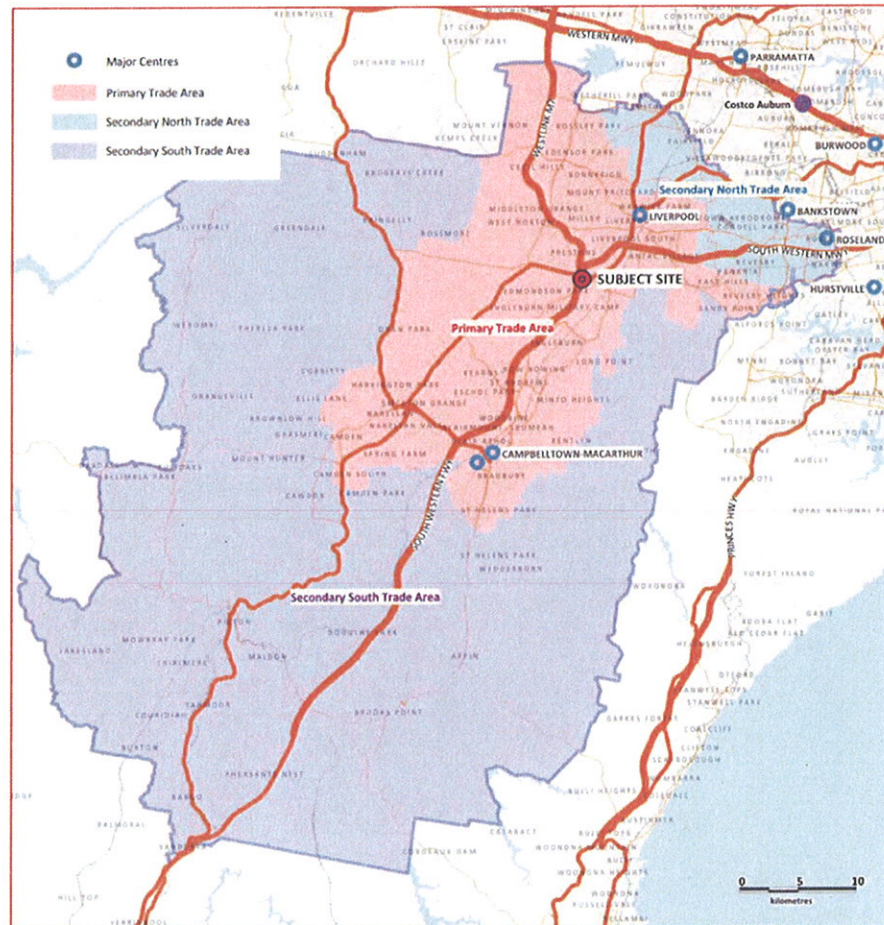


Figure 9 – Retail trade area and location of existing retail centres (source: Essential Economics).

Sequential Site Assessment

In accordance with the Activity Centres Policy a sequential site assessment has been undertaken to assess whether there are any alternative sequentially preferable sites to the Crossroads Site for a Costco development.

In considering edge-of-centre or out-of-centre proposals, the Activity Centres Policy requires the following steps to be taken:

"Step 1: Firstly, it must be demonstrated that there are no suitable sites within an existing or planned new activity centre than can satisfy the demand to be accommodated. This may be achieved by adjusting future intentions for a centre and could include:

- *increasing height and floor space controls,*
- *permitting a broader mix of uses, or*
- *actions to facilitate site availability or site consolidation.*

Step 2: Secondly, it must then be demonstrated that there are no suitable sites in an edge-of-centre location than can satisfy the demand to be accommodated.

Step 3: Thirdly, an out-of-activity centre site that can satisfy the demand to be accommodated may be considered if it meets the Site Suitability Criteria and is consistent with relevant local or regional planning strategy".

The Sequential Site Assessment is set out in detail within Essential Economics' Report at **Appendix A**. As explained in the report, the availability and suitability of sites were assessed for a Costco Warehouse development.

Table 12 summarises the key findings of the assessment of each of the centres and their location.

Table 12 – Key findings of the Sequential Site Assessment

Centre	Findings
Main Centres	
Liverpool CBD	▪ No identifiable sites within the CBD could accommodate a Costco store. ▪ Land consolidation would be required, which would make the development unviable. ▪ Development would not be suitable as it would likely give rise to unacceptable traffic congestion and would displace opportunities for more intensive fine grained retail development.
Casula Mall	▪ The Mall is constrained by surrounding uses and insufficient land is available in and around it to accommodate a Costco Warehouse. ▪ The Mall has poor exposure to the regional catchment and does not meet Costco's commercial requirements. ▪ The Mall is not identified for significant expansion and therefore development in this location would not be consistent with relevant planning policy. ▪ A Costco development would be difficult to integrate with adjoining suburban residential development.
Campbelltown	▪ There are currently no vacant or available sites of sufficient size to accommodate a Costco Warehouse development. ▪ A Costco development in this location would not serve the wider regional catchment and therefore does not meet Costco's commercial requirements.
Leppington	▪ There are currently not identifiable available sites which are likely to come forward within reasonable time frame, which would meet Costco's commercial requirements. ▪ A Costco development within this centre is not considered to be in accordance with relevant planning policy, which seeks instead smaller scale neighbourhood related retail.
Bankstown	▪ Land consolidation of multiple properties would be required, which would make the development unviable. ▪ The location does not meet Costco's commercial requirements as the anticipated trade area would overlap with the Auburn Costco store. ▪ A Costco development within this location would displace the existing fine grained development and dense urban fabric, and therefore is not considered suitable.
Edge-of-Centre Location	
Bridges Road	▪ The site has poor connectivity and access to main roads, Liverpool CBD and local workers. ▪ The site would require significant additional infrastructure. ▪ The site does not meet the identified regional trade area and therefore does not meet Costco's commercial requirements.

Centre	Findings
Memorial Drive and Hume Highway	▪ The site is too small to accommodate a Costco development. ▪ The site is constrained and a Costco development is likely to adversely impact upon the amenity of the surrounding area. ▪ The site has limited access to the regional catchment and limited opportunity to integrate with Liverpool CBD.
El Toro Estate	▪ The site is currently leased by a number of businesses, therefore consolidation of the site would be difficult. ▪ The site is likely to have contamination issues due to its existing industrial use. ▪ The site has limited access to the regional catchment.
Out-of-Centre Locations	
Kurrajong Road	▪ The site is not considered to be sequentially preferable than the proposed Crossroads site and development would not be consistent with relevant planning policy. ▪ The site has a poor synergy with surrounding uses and does not have potential to generate a public benefit. ▪ The site has poor access to the regional catchment. ▪ The site is currently zoned IN1 General Industrial, and a proposed Costco store is not permissible.
Former Hoxton Park Airport	▪ The site is not considered to be sequentially preferable than the proposed Crossroads site and development would not be consistent with relevant planning policy. ▪ A Costco development would not provide the opportunity for public benefit. ▪ The site has poor east-west connections and is a difficult location to serve the identified catchment.
Warwick Farm Shopping Centre	▪ The site is not considered to be sequentially preferable than the proposed Crossroads site and development would not be consistent with relevant planning policy. ▪ The site has poor access to the major road network and identified catchment. ▪ The site contains existing uses and therefore is not currently available. ▪ The site is currently zoned IN1 General Industrial, and a proposed Costco store is not permissible.

4.4.4 Ecological Impact

The Site is cleared and contains little vegetation. It is considered that there will be no impacts to any known critical habitat, threatened species, populations or ecological communities or their habitats resulting from the proposal.

4.5 State and Commonwealth Interests

There are no significant Commonwealth or State interests in the Planning Proposal, other than in general providing an appropriate planning and development outcome on the Site, generally consistent with the State's regional and subregional strategies and the strategic planning framework as described above.

Adequacy of public infrastructure and transport infrastructure

It is understood that the existing infrastructure within The Crossroads development precinct has the capacity to accommodate development on the Site.

State and Commonwealth Agencies

No consultation with State or Commonwealth authorities has been carried out to date on the Planning Proposal.

4.6 Community Consultation

No formal public community consultation has been undertaken to date in regard to this Planning Proposal. It is expected however, that this Planning Proposal will be formerly publicly exhibited and that direction as to the nature and extent of the public exhibition will be given by the Minister as part of the LEP Gateway determination.

5.0 Summary and Recommendations

This Planning Proposal is submitted to request an LEP be prepared to enable an additional use on the Site under Schedule 1 of the Liverpool LEP 2008 to facilitate the future development of the for a Costco Warehouse.

The Site the subject of this Planning Proposal is currently vacant. Having regard to the characteristics of the Site and its location, the proposed site specific additional permissible land use and proposed development controls, are considered appropriate. Furthermore, it is demonstrated that the development of a Costco Warehouse will generate a number of social and economic benefits, without resulting in any adverse environmental impacts.

The proposal fulfils the objectives of the Liverpool LEP 2008, and is consistent with the Metropolitan Plan for Sydney 2036, applicable SEPPs, draft NSW Activity Centres Policy, and the Section 117 Directions. In the absence of any adverse impacts and the community and economic benefits of the proposed grandstand development, we have no hesitation in recommending that Council implement this proposal.

It is therefore requested that the Council resolve to forward this Planning Proposal to the Department of Planning for LEP Gateway determination in accordance with the EP&A Act.