



Appendix F

Sequential Test & Site Suitability Assessment

1.0 Sequential Test

The Draft Centres Policy (2010) includes a Sequential Test to assist in considering Planning Proposals for new retail floorspace in edge-of-centre and out-of-centre locations. It is noted that The Grove Liverpool is identified as a stand-alone centre in its own right. Therefore, the Planning Proposal does not necessarily seek to rezone an edge-of-centre or out-of-centre location. Nevertheless, as the Planning Proposal seeks to facilitate the expansion and diversification of retail uses on the Site, a sequential test has been undertaken.

The Sequential Test includes the following three considerations:

- 1) Demonstrate that there are no suitable sites within an existing or planned new centre that can satisfy the demand to be accommodated.*
- 2) Demonstrate that there are no suitable sites in an edge of centre location that can satisfy the demand to be accommodated; and*
- 3) An out of centre site that can satisfy the demand to be accommodated may be considered if the site meets the Site Suitability Criteria contained within the Draft Centres Policy.*

The Planning Proposal will facilitate the development of a diverse retail centre on the Site accommodating some 27,000m² NLA of bulky goods retail premises, as well as 17,000m² of more traditional retail uses across the following retail types:

- Approximately 5,000m² NLA DDS;
- Approximately 3,800m² NLA major supermarket;
- Approximately 1,600m² NLA ALDI supermarket; and
- Approximately 4,600m² NLA of specialty shops.

The new retail centre will be located within broader centre known as The Grove Liverpool which already accommodates a Dan Murphy's liquor store and various take-away food outlets. It is also approved to accommodate some 19,000m² (GFA) of outlet retailing floorspace. The potential synergies between these types of retail uses will produce unique economic benefits and revitalisation opportunities, and the availability of appropriate sites of a sufficient scale to accommodate these varied types of retail uses is severely limited. Furthermore, the unique location of The Grove Liverpool means that it is appropriately located to draw available retail spend from the Fairfield LGA.

The locations that have been considered for the sequential test are consistent with those that were considered in support of Amendment 22 to Liverpool LEP 2008 which facilitated the development of an outlet retailing centre on the Weekend Markets site. They include the following centres:

- Liverpool City Centre
- Bankstown
- Cabramatta
- Carnes Hill
- Casula
- Leppington
- Crossroads

The following edge-of-centre locations have also been considered:

- Moorebank

- The Industrial Estate to the immediate south of the Site
- Former Liverpool swimming pool site at Memorial Drive and Hume Highway

The suitability of these alternate locations to accommodate the proposed retail outlet centre has been considered against the Site Suitability Criteria from the Draft Centres Policy (2010).

1.1 Existing Centres

1.1.1 Liverpool

The central Liverpool CBD is 1.5km to the south of the Site and is identified as a Regional Centre under the Metropolitan Strategy. The north of the centre is dominated by the Liverpool Westfield complex with a variety of retail and commercial spaces accommodated in the traditional grid pattern layout of the centre.

The land holdings generally consist of a mixture of smaller holdings up to 500m² in area interspersed with larger holdings that have been created as a result of site amalgamations. These larger holdings are generally between 3000 - 5000m² in area.

With this pattern of subdivision, significant amalgamations would be required to provide a development site of sufficient area to accommodate the larger format retail concept proposed. There are no apparent opportunities to feasibly accommodate the proposal within the City Centre on land currently zoned to permit the use.

The EIA at **Appendix A** provides a current assessment of vacant retail premises within the Liverpool CBD and confirms that there is only 6,240m² of vacant retail space within the CBD with the largest single tenancy being 666m².

The Liverpool Retail Centres Hierarchy Review identified the following potential development sites to accommodate future growth in the Liverpool CBD:

- Northumberland Street car park – comprises 0.35ha of land in the southern part of Liverpool CBD.
- Bathurst Street car park – comprises 0.8ha of land opposite Westfield Liverpool.
- Elizabeth Street – land to the south of Elizabeth Street between the junctions of Bigge Street and George Street, and land to the south of Elizabeth Street opposite Westfield Liverpool.

The Council car parks have been acquired and developed by Council to accommodate public parking over a significant period of time via land dedication and acquisition via Section 94 Development Contributions. These sites are too small to facilitate the proposed development. To accommodate the required floor space and car parking on these sites would necessitate the construction of 6 to 7 levels of retail space and several levels of basement car parking. This is a very expensive form of construction, particularly for a low margin stock clearance operation. These construction costs are compounded by the need to provide additional public car parking accommodating the current quantum of public car park provision.

Further, at its meeting of 16 December 2014, Council endorsed a Planning Proposal to rezone the former Peter Warren site at 133 Bigge Street, 26-28 Elizabeth Street, and 148 George Street, Liverpool from B3 commercial core to B4 Mixed Use to accommodate a mixed use development. The Planning Proposal also sought changes to development standards in Liverpool LEP 2008 corresponding to the proposed changes in land use and built form. The Planning

Proposal has now been forwarded to the Department of Planning and Environment for Gateway determination.

Thus none of the sites identified in the Liverpool Retail Centres Hierarchy Review are suitable for the proposed development envisaged on the Site.

The lack of readily available sites in the City Centre and the unfeasibility of undeveloped sites such as Council's car parks make the Liverpool CBD an unfeasible option for the proposal.

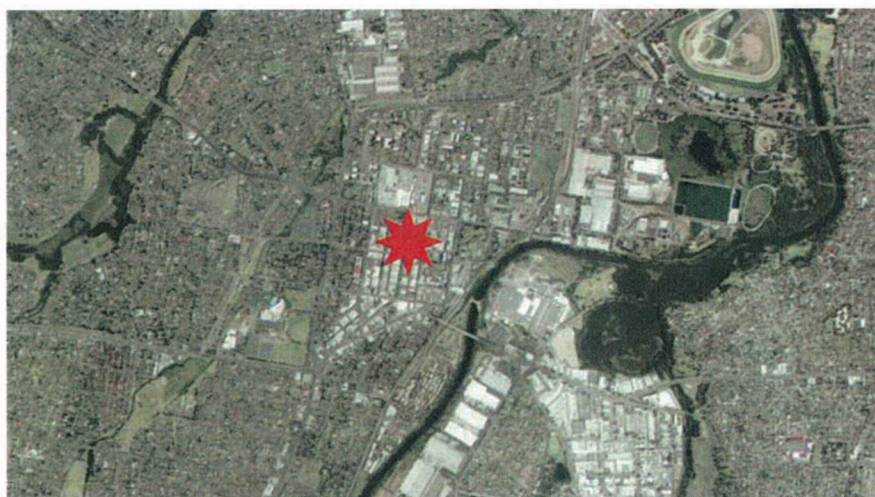


Figure 1 – Liverpool CBD

Table 1 – Liverpool Assessment

Site suitability criteria	Assessment
Strategy Consistent	The Liverpool City Centre would be consistent with the Metropolitan Strategy, the draft Subregional Strategy and Council's Retail Centres Hierarchy Review.
Infrastructure	No detailed assessment has been undertaken. However traffic management would be likely to be a significant matter to be resolved. Utility services would potentially require augmentation.
Access considerations	Good public transport accessibility is available.
Urban Design considerations	The insertion of the large format retail concept into a relatively fine grained location could be problematic and would be unsuitable for the intended method of retailing.
Competing land issues	Land uses would be competing on an economic feasibility basis. The proposal by nature of the retail model and the expense of providing the required retail volume is unlikely to be an economically feasible option. Considering the significant development potential under the planning controls, a retail centre may not represent the highest and best use.
Proximity to labour markets	High accessibility to labour markets is available.
Environmental considerations	No detailed assessment has been undertaken. However there are no apparent issues that would preclude the proposal from the CBD location.
Public benefit considerations.	If a feasible site were able to be amalgamated there could be public benefits subject to resolution of urban design integration requirements.

1.1.2 Bankstown

The Bankstown City Centre is located approximately 15km east of the Site. The centre is identified as a Major Centre under the Metropolitan Strategy and is served by Bankstown Railway Station to the south of the centre.

To accommodate a site of approximately 9ha (which is the area of the Planning Proposal Site alone) in the Bankstown centre would require significant site amalgamation. The site currently existing of the appropriate size is currently developed as a large shopping complex (Centro Bankstown). No readily available feasible sites were identified.

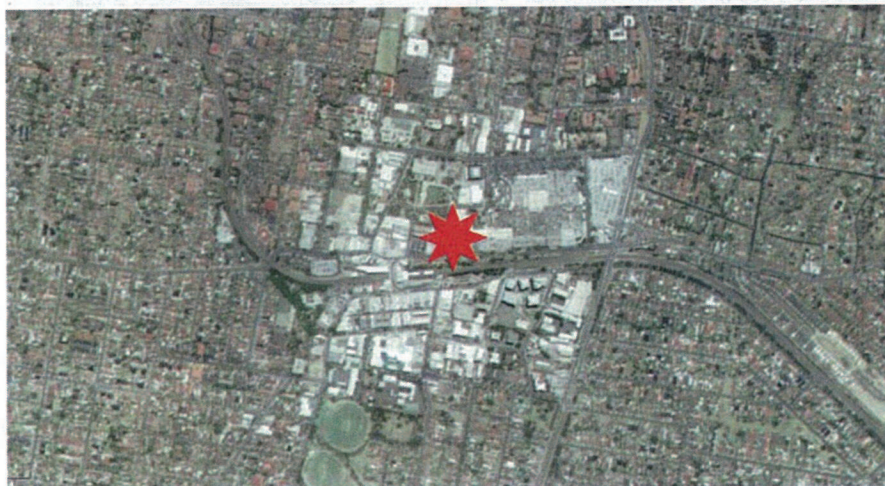


Figure 2 – Bankstown

Table 2 – Bankstown Assessment

Site suitability criteria	Assessment
Strategy Consistent	Bankstown is a Major Centre under the Metropolitan Strategy and the draft Subregional Strategy and would therefore be a consistent location.
Infrastructure	No detailed assessment has been undertaken. However traffic management would be likely to be a significant matter to be resolved
Access considerations	Good public transport to Bankstown is available and pedestrian access could be accommodated.
Urban Design considerations	Conflicts with the large format retail and large customer car parking demand requirements could present challenges to integrating the proposal into the Bankstown Centre.
Competing land issues	The proposal would displace existing uses through the need to amalgamate sites. The amalgamation of sites would likely render the proposal as financially unviable considering the proposal does not represent the highest and best use of town centre land.
Proximity to labour markets	The city centre enjoys high accessibility to employment markets.
Environmental considerations	No apparent concerns arise that have been considered in detail.
Public benefit considerations.	If a feasible site were able to be amalgamated there could be public benefits subject to resolution of urban design integration requirements.

1.1.3 Cabramatta

The Cabramatta town centre is located approximately 3km north east of the Site. The centre is identified as a Potential Major Centre under the *West Central Subregion Draft Subregional Strategy*. The centre is served by Cabramatta railway station located to the east of the centre. Existing development comprises traditional high street retail buildings to John Street surrounded by mid-sized retail/commercial complexes.

The proposed floor area of 27,000m² NLA bulky goods retail premises plus 17,000m² NLA tradition retail premises and associated parking would require significant site amalgamation due to the significant land fragmentation.

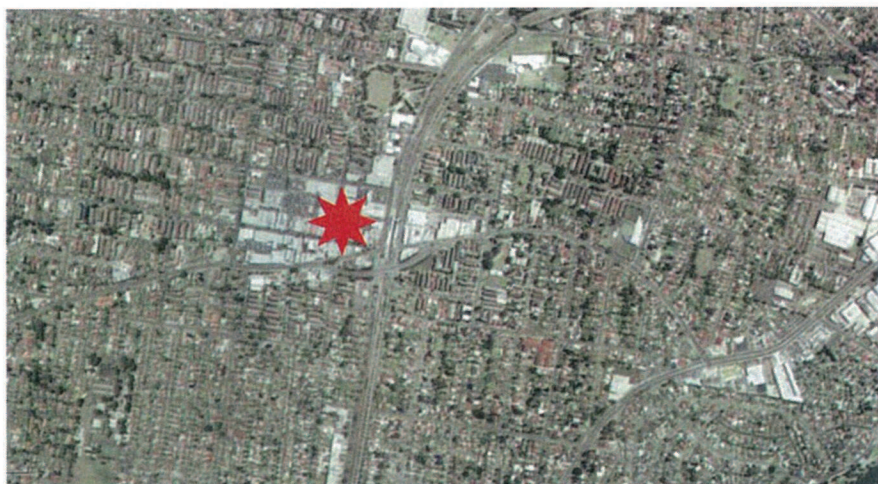


Figure 3 – Cabramatta

Table 3 – Cabramatta Assessment

Site suitability criteria	Assessment
Strategy Consistent	Cabramatta is a Potential Major Centre under the draft Subregional Strategy and would therefore be a consistent location.
Infrastructure	No detailed assessment has been undertaken. However traffic management would be likely to be a significant matter to be resolved
Access considerations	Good public transport to Cabramatta is available and pedestrian access could be accommodated.
Urban Design considerations	Conflicts with the large format retail and large customer car parking demand requirements could present challenges to integrating the proposal into a location that retains a high shopping street focus to John Street.
Competing land issues	The proposal would displace existing uses through the need to amalgamate sites. The amalgamation is however likely to make the proposal unviable in a location that has high land ownership fragmentation, some of which incorporate higher density development compared with a retail centre.
Proximity to labour markets	The city centre enjoys high accessibility to employment markets.
Environmental considerations	No apparent concerns arise that have been considered in detail.
Public benefit considerations.	The public benefits experience from the introduction of the proposal would in part be off-set by the displacement of current uses through the need to amalgamate sites. The difficulties of introducing large format retail into a generally denser shopping street location may result in a poorer urban design outcome for the centre.

1.1.4 Carnes Hill

Carnes Hill is located approximately 10km south west of the Site. The centre is identified as a Town Centre under the *South West Subregion Draft Subregional Strategy*. The centre is served by public bus transport along Cowpasture Road. Existing development comprises stand-alone shopping mall anchored by a supermarket with at grade car parking. The accommodation of 44,000m² NLA of bulky goods and traditional retail premises in the Carnes Hill centre would require either displacement of the current retail development or expansion of commercially zoned land to accommodate the proposed use.

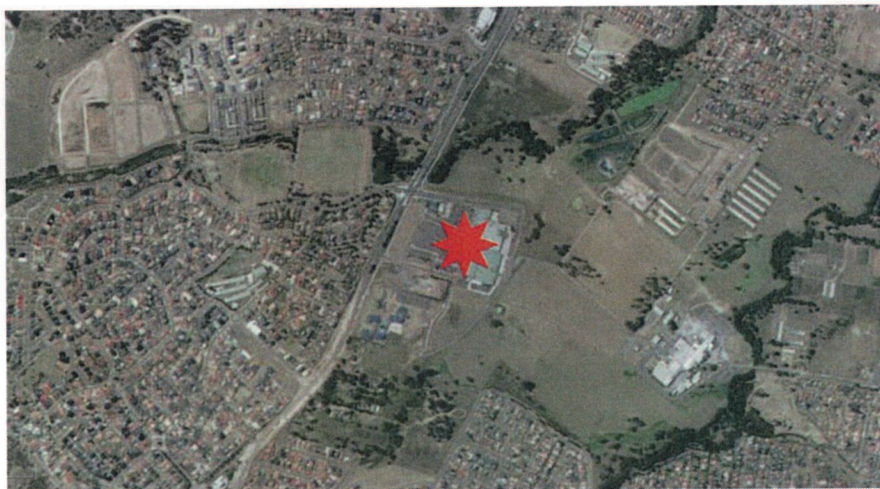


Figure 4 – Carnes Hill

Table 4 – Carnes Hill Assessment

Site suitability criteria	Assessment
Strategy Consistent	Carnes Hill is identified as a Town Centre under the draft Subregional Strategy. The required level of expansion may result in the creation of the centre as a higher order centre than the current planning framework envisages.
Infrastructure	No detailed assessment has been undertaken. However traffic management would be likely to be a significant matter to be resolved given the distance of the site from rail.
Access considerations	Public transport via bus is available and pedestrian access could be accommodated.
Urban Design consideration	The pattern of current development could accommodate the proposed large format retail proposed.
Competing land issues	The proposal would require the displacement of existing uses and or require a significant expansion to land zoned for commercial/business. The potential expansion to the north is limited by tributary of Cabramatta Creek and is likely to represent constraints from flooding and flood management. Expansion to the east and south is limited by developing residential areas.
Proximity to labour markets	Accessibility to labour markets is available. However the access is constrained due to the limited public transport availability.
Environmental considerations	Flooding and flood management is likely to be a constraint if the employment lands were to be expanded to the north of the site. This land to the north is currently zoned for public recreation purposes and is the subject of future community uses.
Public benefit considerations.	The public benefits of this location would be likely to be limited given the loss of land zoned for public recreation purposes, and the cost of reconfiguring the existing centre.

1.1.5 Casula Mall

Casula Mall is located approximately 6km to the south of the Site. The centre is a stand-alone shopping centre that is identified as a Town Centre under the *South West Subregion Draft Subregional Strategy*. The opportunity for expansion is highly constrained by existing public and developed residential areas.

The centre is not located on an arterial road and therefore likely to create neighbourhood traffic issues.

The establishment of a new retail centre of the scale envisaged by the Planning Proposal in this location would effectively require the displacement of current land uses, which is considered unlikely and unfeasible.

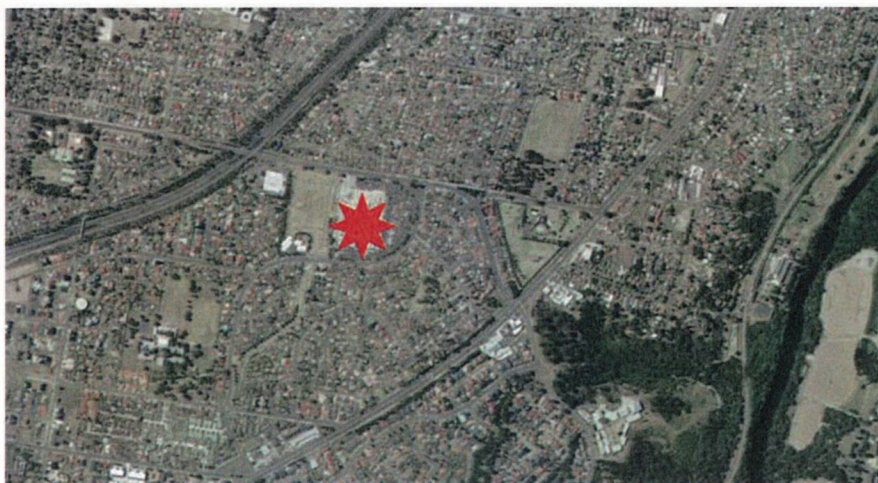


Figure 5 – Casula

Table 5 – Casula Assessment

Site suitability criteria	Assessment
Strategy Consistent	Casula Mall is identified as a Town Centre under the draft Subregional Strategy and therefore is not categorised as a location suitable for major destination retailing.
Infrastructure	No detailed assessment has been undertaken. However traffic management would be likely to be a significant matter to be resolved given the lack of rail public transport options and the circuitous route to the arterial road network.
Access considerations	Public transport via bus is available and pedestrian access could be accommodated.
Urban Design consideration	The pattern of current development could accommodate the proposed large format retail proposed, but would necessitate the displacement of the current uses in order to accommodate the required land area due to the absence of expansion opportunities.
Competing land issues	The displacement of current land uses would be required.
Proximity to labour markets	Access to the employee market is limited by the lack of public transport options.
Environmental considerations	No apparent concerns arise that have been considered in detail.
Public benefit considerations.	No apparent potential public benefits. Any expansion of the centre would result in a negative public benefit thorough the potential loss of open space and impact on neighbourhood collector roads.

1.1.6 Leppington

Leppington is approximately 14.5km south west of the Site and is a Planned Major Centre located within the South West Growth Centre. The proposed centre is within the Leppington precinct that is yet to be fully serviced for urban development. The timeframe for development is therefore not expected to be in the short term and therefore not appropriate.

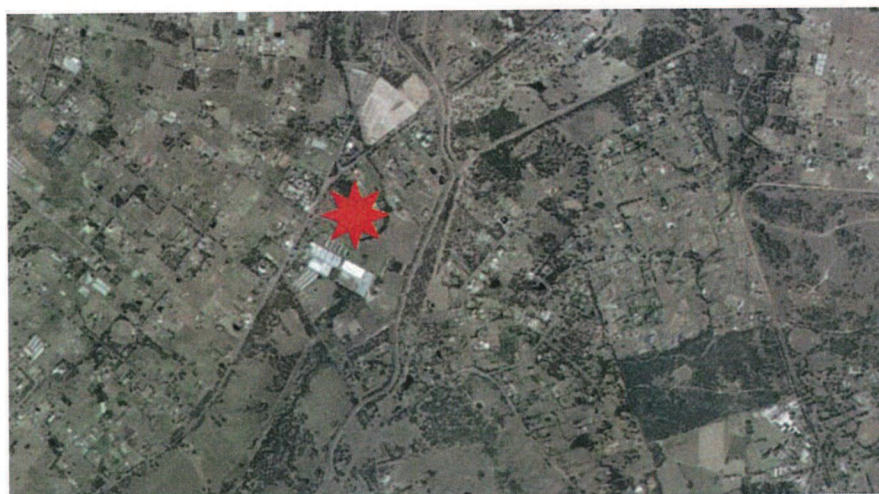


Figure 6 – Leppington

Table 6 – Leppington Assessment

Site suitability criteria	Assessment
Strategy Consistent	Leppington is a Planned Major Centre under the draft Subregional Strategy and the Growth Centres Structure Plan and would therefore be a consistent location for the proposal if the land was zoned and available for development.
Infrastructure	Currently not available but will be provided as part of the precinct development process.
Access considerations	The centre is planned to be serviced by the South West Rail Link and public transport in the form of buses will be planned for in the precinct release process.
Urban Design consideration	These could be accommodated. However the precise location of large format retailing has not yet been confirmed.
Competing land issues	The land is planned for retail and employment generating uses.
Proximity to labour markets	Currently poor, but if the rail link is delivered will be significantly improved. In any case, the necessary residential catchment will not likely eventuate for quite some time.
Environmental considerations	No detailed assessment at this stage but preliminary investigation through the structure plan development phase has identified that the land will be suitable for development in the future.
Public benefit considerations.	No specific potential public benefit has been identified and would be difficult to identify due to the longer term nature of release areas.

1.1.7 Cross Roads

Detailed consideration of the Crossroads centre has not been pursued as a significant area of the land zoned B5 Business Development has recently been rezoned and redevelopment as a new Costco store. The establishment of a new retail centre at this location would necessitate a rezoning of land currently zoned IN3 Heavy Industrial.

1.2 Edge-of-Centre Locations

1.2.1 Moorebank

Moorebank is an edge-of-centre location that is approximately 4km southeast of the Site. The edge location precinct is located to the east of the Georges River, opposite the Liverpool City Centre. The precinct comprises a range of relatively large holdings zoned IN1 General Industrial and IN2 Light Industrial.

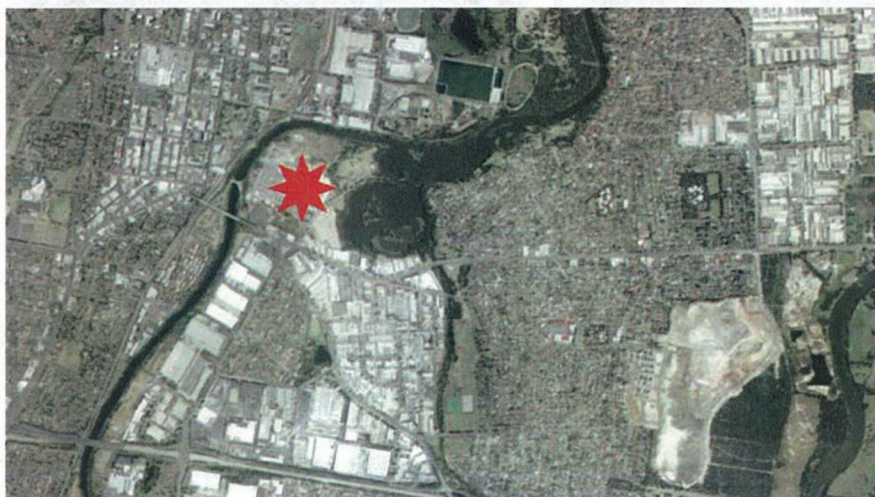


Figure 7 – Moorebank

Table 7 – Moorebank Assessment

Site suitability criteria	Assessment
Strategy Consistent	Geographically the area is an edge-of-centre location. However there is a significant barrier to integration formed by the Georges River. The area is identified as employment lands for industrial purposes and any rezoning to permit retail activity would be contrary to the Metropolitan Strategy as it would result in the loss of land zoned for industrial purposes.
Infrastructure	Utility infrastructure is likely to be available or could be augmented. Traffic impacts arising from the increased light vehicle traffic would be an issue that would require resolution and would be made more difficult by the limited existing connectivity.
Access considerations	Public transport access is poor. Pedestrian access may be accommodated.
Urban Design consideration	The locality is an industrial precinct into which the large format building could be integrated.
Competing land issues	Any rezoning would necessitate the loss of land zoned for industrial purposes.
Proximity to labour markets	Relatively poor due to the limited access to public transport options to the locality.
Environmental considerations	Likely to require flood management considerations and confirmation of the suitability of the area having regard to potential land contamination.
Public benefit considerations.	Limited unless direct pedestrian link is established from Liverpool railway station.

1.2.2 Industrial Estate to South

The industrial estate to the immediate south of the Site is zoned IN1 General Industrial. The precinct would be considered as an edge-of-centre location. The industrial units in this complex are largely strata titled complexes representing a significant barrier to the amalgamation of sites large enough to accommodate the proposed retail centre.



Figure 8 – Industrial Estate to South

Table 8 – Industrial Estate Assessment

Site suitability criteria	Assessment
Strategy Consistent	The site is an edge-of-centre location and is therefore consistent with the Metropolitan Strategy as an option to consider. The conflict with the Strategy arises from the area being identified as employment lands for industrial purposes. Any rezoning to permit retail activity would be contrary to the Metropolitan Strategy.
Infrastructure	Infrastructure could be augmented. However additional traffic management measures would be required to be provided to facilitate access into and out of the location.
Access considerations	Access is available via bus public transport along Orange Grove Road and the Hume Highway public. Pedestrian accessibility could be accommodated.
Urban Design consideration	The large format retail could be integrated into the existing development forms and management of impacts to residential lands to the west could be addressed.
Competing land issues	The use of this land would require displacement of land zoned for industrial purposes. The displacement of existing use would affect the feasibility of the location as an option.
Proximity to labour markets	Good given the proximity to the Regional Centre of Liverpool.
Environmental considerations	Minimal expected. However confirmation of the suitability relative to land contamination may be required.
Public benefit considerations.	The displacement of industrial employment lands would need to be considered in the context of the employment opportunities that would arise. In this context a neutral public benefit is likely to accrue.

1.2.3 Former Liverpool Swimming Pool Site

The former Liverpool swimming pool site is located at the intersection of Memorial Drive and the Hume Highway. The site adjoins the Whitlam Leisure Centre. The site is located 2km south of the Planning Proposal Site. It is an edge-of-centre location but separated from the Liverpool CBD by residential development to the north and east. To the south and west of the location are community uses in the form of open space and recreation facilities.

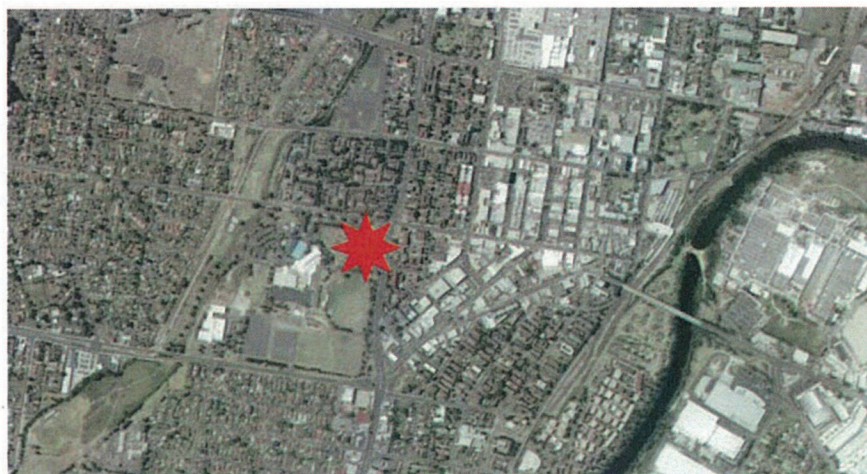


Figure 9 – Former Liverpool Swimming Pool

Table 9 – Former Liverpool Swimming Pool

Site suitability criteria	Assessment
Strategy Consistent	The site is an edge-of-centre location and is therefore consistent with the Metropolitan Strategy as an option to consider.
Infrastructure	Infrastructure would require augmentation and traffic management would need to be considered.
Access considerations	Public transport via bus is available adjacent to the site and pedestrian access could be readily accommodated.
Urban Design consideration	Integrating with the City Centre and surrounding recreational area would be a significant consideration.
Competing land issues	The use would require rezoning and would displace recreation lands due to the land take requirements of the proposal.
Proximity to labour markets	Relatively good given the proximity to the Regional Centre of Liverpool.
Environmental considerations	No apparent concerns arise that have been considered in detail.
Public benefit considerations.	Likely to be negative given the loss of recreation lands and public parking currently situated at the site.

1.3 Summary

The Sequential Test has demonstrated that there are no opportunities to use existing buildings/sites in the Liverpool CBD for the proposed new retail centre. To amalgamate an appropriately sized site within the Liverpool CBD would be difficult due to the high fragmentation of land ownership and current subdivision pattern. There are also limited sites that could be considered to accommodate the development proposed in other centres or edge-of-centre locations.

2.0 Site Suitability Assessment

In addition to the Sequential Test and consideration of the Site Suitability Criteria for other centres and edge-of-centre locations, the Centres Policy requires an assessment of the physical and locational characteristics of the Site to be undertaken to demonstrate its suitability for development facilitated by the Planning Proposal. This is considered below.

The proposed retail centre is intended to provide a range of affordable retail facilities for surrounding residents, and allow for the co-location of a range of retail services within The Grove Liverpool to maximise convenience and accessibility. Some 44,000m² NLA of bulky goods and traditional retailing is

proposed within the new single centre, which will link with the adjoining outlet retailing centre. The type of development proposed requires a large area of level land to accommodate a single-level tenancy and ample customer parking. It also requires a site with good access to arterial roads, and high levels of exposure preferably on a highway location with the ability to service a large catchment.

The Site satisfies these requirements and will allow for the full use of the Site which is currently only partially occupied by the existing homemaker centre.

The Grove Liverpool is located at the edge of the Liverpool Regional Centre and is serviced by public transport. It is an existing stand-alone centre that contains a number of current and approved services and retail formats including bulky goods retailing, food outlets, a gym and an approved outlet retailing centre. The proposed new centre will provide additional opportunities for traditional retailing on the Site and will allow multi-purpose trips to be undertaken in a single visit. It is also strategically well located between the Liverpool and Fairfield LGAs allowing the Site to service these large population centres in a location with good highway exposure via Cumberland Highway.

Environmental constraints have been considered in detail in the Planning Proposal report and it is considered that the Site can be appropriately developed for the new retail centre without unacceptable environmental impacts. The EIA undertaken in support of the proposal (**Appendix A**) and the peer review of the EIA (**Appendix E**) conclude that the economic impacts of the proposal on the Liverpool CBD, as well as other surrounding centres, will be acceptable.

The preceding assessment has demonstrated that there are limited feasible and practical alternatives within the Liverpool CBD (and other centres) for the proposal. The amalgamation of sites in the CBD to create a 9ha level holding would necessitate the consolidation of several properties. Similarly, the construction of a multi-level retail centre is considered unviable and not the CBD land's highest and best use considering the floor space ratio and height controls that apply.

The Site is an existing large holding that already has the required infrastructure in place to support the proposed new centre and is considered suitable. Notably, the Traffic and Parking Assessment confirms that appropriate intersection upgrades can be undertaken to support the additional traffic from the proposed new centre. This can be facilitated in a VPA which may also contribute towards improved pedestrian connectivity, as well as contributions towards infrastructure consistent with those required in the Liverpool CBD.