

7 July 2017

Ms. Kiersten Fishburn  
General Manager  
Liverpool City Council  
Locked Bag 7064,  
Liverpool BC, NSW 1871

Attention: Bruce Macnee, Manager Strategic Planning - [MacneeB@liverpool.nsw.gov.au](mailto:MacneeB@liverpool.nsw.gov.au)

Dear Kiersten,

**Re: 4-8 Hoxton Park Road, Liverpool**

I understand that a planning proposal is to be submitted to Liverpool Council relating to the abovementioned property, seeking to enable its use for mixed use purposes, with retail/commercial activation at the building's lower levels.

The subject site is located at the corner of Gillespie Street and Hoxton Park Road, near the south-eastern junction of Hoxton Park Road and the Hume Highway.

Council has advised that such a proposal requires that consideration be given to the nature of intended commercial and retail uses, with regard for the types of uses that might be encouraged under the current B6 zoning and those under a B4 zoning.

MacroPlan Dimasi has been requested to provide a professional opinion as to:

- The proposed retail/commercial component of the project, specifically regarding its potential impact on adjoining properties (and the retail hierarchy); and
- The optimal use of the ground/lower floors – i.e. whether this should be commercial/retail or straight residential and whether there is a market justification for such.

I note that the site is somewhat constrained in a traffic sense although rimmed by other existing and approved retail/commercial premises (including the Collingwood Hotel). I also note that the adjoining site at the corner of Hoxton Park Road and the Hume Highway (311 Hume Highway) has been or is about to be rezoned for 'B4 Mixed Use' purposes, incorporating approximately 163m<sup>2</sup> of ground floor retail space.

MacroPlan Dimasi is a national property consultancy which specialises in understanding and quantifying retail land use. The opinion provided in this response is based on our company's experience in dealing with the use of retail/commercial floorspace in a range of different formats and locations.

I note that under the B6 zone, development for the following retail/commercial purposes are possible:

*Business premises; Commercial premises; Educational establishments; Entertainment facilities; Function centres; Garden centres; Hardware and building supplies; Hotel or motel accommodation; Information and education facilities; Landscaping material supplies; Light industries; Plant nurseries; Recreation areas; Recreation facilities (indoor); Registered clubs;*

*Serviced apartments; Vehicle repair stations; Veterinary hospitals; and Warehouse or distribution centres.*

The range and scale of permitted uses under the B6 zoning is vast.

Under a B4 zoning, the following commercial/retail uses are permitted:

*Boarding houses; Child care centres; Commercial premises; Educational establishments; Entertainment facilities; Function centres; Hostels; Hotel or motel accommodation; Information and education facilities; Medical centres; Recreation areas; Recreation facilities (indoor); Registered clubs; Respite day care centres; Restricted premises; Tourist and visitor accommodation; Vehicle repair stations; and Veterinary hospitals.*

The range of commercial/retail uses permitted in a B4 zone is not substantially different from those permitted in the B6 Enterprise Corridor, except that boarding houses, child care, hostels, medical centres, and tourist/visitor accommodation are not permitted in the B6 zone.

Likewise, garden centres, hardware and building supplies, landscaping supplies, light industry, plant nurseries and warehouse/distribution centres are permitted in the B6 zone, but not in the B4 zone.

I note that the collective 'commercial premises' is permitted in both zones – this definition captures business premises, office premises and retail premises. Retail shops in the B6 zone are restricted to a GFA of 1,600m<sup>2</sup>. Development in the B4 zone must also comprise a non-residential use on the ground floor.

At face value, a ground floor residential use would appear to be a sub-optimal use for the ground floor, given traffic conditions, noise etc, and its relationship with adjoining land. A commercial/retail ground floor use is therefore a likely redevelopment outcome, whether compelled by a B4 zoning or not.

It is expected that on-site parking will be made available for any commercial/retail use, as the site would otherwise be difficult to access (i.e. no on street parking). GTA's independent traffic report has allowed for a full 1,000m<sup>2</sup> of lower level retail floorspace in its calculations of traffic impacts for the site. It finds that the traffic impacts of the site's development will not worsen the impacts associated with the development of the adjoining 311 Hume Hwy.

If the full 1,000m<sup>2</sup> were to be provided at ground level (or over, say, 2 levels), a range of common uses permitted in either the B6 or B4 zone would suit – including business, office or retail premises, educational premises, information facilities, or a veterinary facility.

I believe that the site is not suited to most of the permitted B6 land uses due to its constrained access – e.g. as an entertainment facility, a function centre, a large garden centre or hardware and building supply yard, a landscaping material supplies, a large plant nursery, a recreation area or indoor facility; a registered club, or a warehouse/distribution centre. Smaller versions of some of the B6 permitted uses may be suited, e.g. a small garden centres or hardware store, or a vehicle repair station, but these uses could fit within the commonly permitted 'commercial premises' definition.

On the other hand, some uses that are specifically permitted in the B4 zone (e.g. a boarding house, child care, hostel, or medical centre) would be suited at the site, providing facilities suited to, or services for, the surrounding residential catchment south of Hoxton Park Road.

The B6 Enterprise Corridor zone is intended to primarily accommodate large footprint land uses that are not easily located in town centres. Many of these uses are car-dependant and or require on-site loading and unloading space.

For the subject site, the range of smaller footprint land uses that are permitted in the B4 zone are, on the whole, more suited to the subject site as these are likely to serve a walkable catchment and/or not require large vehicle access. They can also benefit from the high exposure levels that are available at the subject site, but do not depend on high traffic levels to generate business.

MacroPlan recommends that the site's best commercial/retail use might involve:

- A 7-Eleven or convenience retail servicing residential development above and/or adjacent walkable catchment including hairdresser, newsagency, café, dry cleaners, etc.
- Other retail outlets including a 'small' lighting, bathware, flooring or carpet store etc – these could well fit a retail premises definition rather than require a 'bulky goods' definition to be allowed.
- A medical centre, allied health, language school or other educational facility (not being a school).
- A new format motor showroom.

In my opinion, these types of uses are more suited to a B4 zoning rather than a B6 zoning and are more likely to be provided in conjunction with the residential development of the site. The alternate range of business/retail uses currently permitted under the B6 zone are, in my opinion, sub-optimal.

The nominated uses could locate at the site without any adverse impact on Liverpool's established retail hierarchy, whether they singularly occupy the full 1,000m<sup>2</sup> that is available, or each occupied a part of it.

I trust that this information informs Council's deliberations in relation to the planning proposal.

Yours sincerely,



Wayne Gersbach  
**General Manager - NSW**