27 March 2026

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Re: Moore Point Planning Proposal (PP-2022-1602) — Request to Cease Progression

Dear Daniel

Moore Point has long been identified as a location of strategic importance to Liverpool City Centre's evolution. Over many years, strategic documents have highlighted its potential to contribute new homes, jobs, open space and foreshore activation, supporting the expansion of the Liverpool CBD becoming a true river city.

Leamac Property Group/CVC Limited have actively supported this long-term vision. Over the past decade we, in partnership with other landowners in the precinct, have undertaken substantial technical work, collaborated with Liverpool City Council and State agencies, and advanced a consolidated Planning Proposal through Gateway Determination and public exhibition.

We remain grateful for the dedication and professionalism demonstrated by the Department and all stakeholders involved.

However, as the assessment has advanced, critical technical, structural, and economic issues have emerged which fundamentally alter the feasibility and deliverability of the precinct. After careful consideration, Leamac/CVC Limited have concluded that it is no longer viable or responsible for us to continue progressing PP-2022-1602.

The key issues are outlined below.

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1. Critical Transport Network and Flood Planning Issues

As the precinct planning has moved into more detailed phases, two interrelated technical matters—regional transport capacity and flood evacuation requirements—have become clear structural constraints. These issues form the primary basis for Leamac/CVC Limited's request to discontinue the rezoning process.

1.1 Updated Transport for NSW (TfNSW) Traffic and Network Analysis

Recent engagement with TfNSW, including the February 2026 review of the precinct's Transport Modelling and Access Plan (TMAP), has identified network-wide impacts far greater than previously understood. TfNSW's independent modelling demonstrates that:

- Traffic generated by the precinct affects a significantly larger area of the regional network than the proponent's earlier modelling suggested.
- The cumulative impacts extend to major arterial corridors and intersections already experiencing high congestion levels.
- Mitigation measures previously contemplated during early stages of the Planning Proposal are insufficient to maintain acceptable performance.

- The scale and cost of upgrades required would exceed what could reasonably be delivered by the proponent or justified under standard planning agreements.

TfNSW has also advised that the previously anticipated realignment and upgrade of the Moorebank Avenue / Newbridge Road / Bridges Road / Heathcote Road intersection is unlikely to proceed in the foreseeable future. This intersection is a critical access point for the precinct. Without this upgrade, and significant Government investment the road network cannot support the level of density required for a viable mixed-use precinct.

In effect, the transport evidence now indicates that the precinct cannot accommodate the originally envisaged yield without major regional infrastructure investment, which sits outside Leamac/CVC Limited's control.

1.2 Flood Modelling, Evacuation & Emergency Access Requirements

In parallel with transport work, the precinct is subject to stringent flood evacuation and resilience requirements due to its position within the Georges River and Lake Moore floodplain.

While Stage 1 flood analysis was completed, the required Stage 2 detailed flood modelling has not yet been undertaken. Based on preliminary advice, it is clear that:

- Additional modelling is likely to require further raising of levels, redesign of access routes, and reconsideration of safe evacuation timeframes.
- Flood evacuation requirements are intrinsically tied to transport network performance; if key intersections and bridges cannot function reliably during flood events, the precinct's evacuation strategy becomes compromised.
- Achieving compliance with PMF-level safety may require significant overland flow path works, elevated structures, and staged evacuation thresholds that materially constrain feasible built form.
- These requirements would likely reduce the deliverable density well below earlier assumptions.

Taken together, the flood and transport constraints create a cascading yield suppression effect: reduced capacity to move people in and out of the site during peak periods and flood events means the precinct cannot responsibly support the population originally modelled.

1.3 Combined Effect: An Irreconcilable Constraint on Precinct Delivery

The interaction between transport capacity and flood evacuation is central. Without sufficient network performance:

- higher densities cannot be supported;
- the evacuation strategy cannot be certified;
- infrastructure funding gaps widen; and
- the land cannot transition from industrial to high-density mixed use without unacceptable risk.

These technical issues—independent of commercial considerations—are now definitive limitations on the precinct's progression.

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2. Reduced Yield

The transport and flood constraints, given the views expressed by authorities to date, are expected to give rise to the possibility that the project is subjected to a significant reduction of GFA. If actioned, this reduction would in turn reduce the number of dwellings and the commercial / non-residential floorspace that could responsibly be delivered.

A reduced yield:

- increases the already wide infrastructure funding gap,
- eliminates the ability of the proponents to feasibly contribute to, in an economically viable project, bridges, significant public domain, and flood works, and
- removes an economically viable business case which is required to procure the necessary funding to support the development of this precinct.

It is unlikely that the precinct could sustain the infrastructure burden associated with its envisioned mixed-use form and density. Any further reduction from the PP FSR levels only further detracts from the ability of the precinct to carry this heavy infrastructure load which is being driven by as yet resolved hydraulic and traffic issues.

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3. Significant Construction Cost Escalation Affecting Feasibility

Notwithstanding, and in addition to the above, over the course of this PP (2017-present), the landscape surrounding medium/high density construction has materially changed. Construction costs have increased markedly (c.40% since 2021), as has been widely reported across the market and in the media. The viability of any project with the density proposed on this project is questionable, let alone a precinct of this scale. This market reality sets out the following situation:

- The current Precinct assessed using present construction rates assuming the infrastructure solutions and FSR as proposed in the submitted PP is at this time unviable;
- The current PP infrastructure solutions are no longer considered sufficient, therefore either:
  - Development yield stays the same and infrastructure demands / costs materially increase (ignoring the practicality of how these solutions are found); or
  - Development yield is reduced and infrastructure costs remain the same; or
  - Development yield is reduced and infrastructure costs materially increase
- All of these modifications only serve to further move the project away from being viable and there would be no economic business case to proceed with development. The land would sit sterilised, uneconomic and underutilised.

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4. Fragmentation of Land Control

Coronation Property's sale of 361 Newbridge Road and 6 Bridges Road, its decision to retain 8 Bridges Road as industrial land and their objection to entering into a VPA should the land be rezoned has resulted in the loss of key access and infrastructure parcels and a critical share of infrastructure funding required to deliver the project. These changes undermine the integrated landholding structure assumed throughout the planning process, as well as the necessary surety that infrastructure can be guaranteed.

A coordinated precinct outcome is now impractical and will inevitably further reduce the development yield.

Conclusion and Request

Taken together, **these transport, flood, economic and structural issues make the mixed-use, high-density precinct outcome unachievable.** Under these circumstances, the most responsible course is to cease pursuit of the rezoning.

Accordingly, **Leamac Property Group/CVC Limited's respectfully requests that the Department cease progression of PP-2022-1602** and allow the land to remain under its current industrial zoning, which is designated as Regionally Significant under the Sydney Plan.

We thank the Department, Council, TfNSW and other stakeholders for their considerable efforts in assessing the PP. We remain committed to constructive dialogue and would welcome future engagement as to the potential future of the precinct as employment land.

Yours sincerely,

Leamac Property Group

Angus MacInnes
Director

CVC Limited

Mark Avery
Managing Director