

2 June 2022

Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Attention: Rezoning Review Team,

Dear Sir/Madam,

**RE: 84 Memorial Avenue, Liverpool – Lot 100, DP 1014714
Schedule 1 Amendment to the Liverpool Local Environmental
Plan 2008 to Allow Residential Flat Buildings, Serviced
Apartments and Limited Commercial Premises, including Height
of Buildings and Floor Space Ratio Amendments**

This letter has been prepared to accompany a rezoning review regarding a planning proposal over land known as 84 Memorial Avenue, Liverpool.

This submission follows the receipt a letter issued by Liverpool City Council dated 22 April 2022 which advised that the subject planning proposal has not been supported by Council and will not be proceeding to a Gateway Assessment.

This submission has been prepared on behalf of our clients, Canterbury League Club, the landowners of the subject site.

Site History

The site has an existing approval dating back 2000 for a registered club and hotel. This consent was acted upon and remains a valid, operative consent. It is zoned RE2 Private Recreation and is separate from the broader Woodward Park which was zoned RE1 Public Recreation. Refer to Figure 1 for the Site Location Map.

The planning proposal that is the subject of this rezoning review was first discussed with Liverpool Council senior staff (including Director of Planning) in 2015, with subsequent conversations with staff and councillors in 2016, 2017 and early 2018, leading up to the formal preparation and lodgement of a planning proposal in July 2018. GAT &

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Associates was engaged as the consultant planners through these early conversations and the lodgement process.



Figure 1: Site Location Map (Source: Mecone Mosaic)

On 18 June 2019, Council expressed in a letter that their assessment of the planning proposal concluded that the proposal lacked strategic and site specific merit. Meetings were held with Council in July and November 2019 and has ultimately led in the position that Council will not support the planning proposal to Gateway.

It is worthy to note that the rejection of the planning proposal was fundamentally in relation to the provision of the residential units component. The proposed registered club, hotel, serviced apartments and limited commercial to provide support to the uses sought on the site were generally viewed as acceptable in the context of the RE2 Private Recreation zoning.

Planning Proposal Strategic Merit – Original Submission

The Demographic and Housing Characteristics Report prepared by ALpha Demographics as part of the planning proposal lodgement indicated that the rate of completions at the time of report preparation (early 2018) was going to fall short of the housing targets identified for the Liverpool LGA in the Western City District Plan of 8,250 new dwellings. The planning proposal was submitted with the position that the approximately 1,150 dwellings that would be achieved under the planning proposal

would contribute toward Liverpool Council area achieving their dwelling targets over the 2016-2036 period, which had an implied demand of 44,000 over the full 20 year period.

The subject site was considered an appropriate location for the additional residential dwellings. The site is located directly adjacent to the Liverpool City Centre, on the western side of Hume Highway which serves as the boundary of the CBD. The existing access to the CBD requires crossing at least two pedestrian crossings at the traffic lights of Hume Highway and Memorial Avenue as there is no east-west pedestrian crossing directly adjacent to the site at this intersection. To improve the linkages from this location into the CBD and to the adjoining public open space and facilities in the broader Woodward Park, a pedestrian footbridge was sought to be included in the proposal under a Voluntary Planning Agreement (VPA), amongst other aspects.

While the site is located 950m walking distance (850m radius) from the Liverpool Train Station and outside what is typically defined as “accessible area” for the train station, the site is both 350m walking distance from the Liverpool-Parramatta Transitway and enjoys bus stops directly in front of the property on both sides of Memorial Avenue. These bus services provide easier access to the Liverpool Train Station or other destinations such as Parramatta for employment purposes. The bus stops in front of the site also allow for quick access to services within the CBD and shopping in the form of a stop outside of Westfield Liverpool. The location therefore is accessible and aligns with the Strategic Directions of the Western City District Plan to provide residential within 30 minutes of jobs and services in major centres where there is available public transport.

The site is adjacent to the public open space of Woodward Park, Hillier Oval and the Whitlam Leisure Centre, making it an attractive location for future residential development. Schools, too, are within walking or public transport distance, with Liverpool West Public School, Liverpool Public School, and Marsden Road Public School within a 900m radius of the site.

Amendment 52 of the Liverpool Local Environmental Plan 2008 upzoned land within the Liverpool CBD for additional residential density, however did not provide for any additional open space. The VPA includes a pedestrian bridge which will create connectivity between the CBD and Woodward Park via the public thoroughfare designed into the planning proposal, which serves to assist in improving accessibility of the intended future CBD residents with key public open space.

The site, essentially, had proximity to services and thus was put forward as worthy of consideration for the provision of increased residential density.

In terms of the strategic policy perspective, the planning proposal was submitted as consistent with A Metropolis of Three Cities and the Western City District Plan. The proposal aligned with the following planning priorities:

- W1 – Planning for a city supported by infrastructure
- W3 – Providing services and social infrastructure to meet people’s changing needs
- W4 – Fostering healthy, creative, culturally rich and socially connected communities
- W5 – Providing housing supply choice and affordability, with access to jobs, services and public transport
- W6 – Creating and renewing great places and local centres, and respecting the District’s heritage
- W9 – Growing and strengthening the metropolitan cluster
- W11 – Growing investment, business opportunity and jobs in strategic centres
- W15 – Increasing urban tree canopy cover and delivering Green Grid connections
- W16 – Protecting and enhancing scenic and cultural landscapes
- W18 – Delivering high quality open space
- W19 – Reducing carbon emissions and managing energy, water and waste efficiently
- W20 – Adapting to the impacts of urban and natural hazards and climate change

The reasons for this alignment are detailed within the planning proposal documentation, in particular the Planning Proposal report prepared by GAT & Associates. A brief summary is:

- The location of the planning proposal is proximate to existing and future jobs in the Liverpool CBD, with excellent availability of public transportation to other centres near and further afield. The proposal would serve to enhance the ability for more residents within Sydney to be within 30 minutes of a metropolitan centre/cluster (i.e. Liverpool CBD itself, Campbelltown and the under development Aerotropolis).
- The proposed VPA would contribute toward upgrades of the Whitlam Leisure Centre, Hiller Oval and Woodward Park generally, as well as the pedestrian overpass of Hume Highway to increase connectivity with the CBD for residents of the development and those in the CBD to utilise the existing and future Woodward Park. The site is not zoned for public open space and has an existing approval for private recreation, which would be maintained through the larger 9,300m² registered club that suits contemporary needs.
- The proposed registered club, hotel, serviced apartments and limited commercial would create new jobs in the area. These uses and jobs would not compete or conflict with the CBD as they target different audiences and users,

such as residents (limited commercial to support their needs), visitors (in the form of the hotel, serviced apartments and registered club) and those utilising the Woodward Park facilities (any restaurants, cafes or modest convenience shops may also be utilised by those users). The CBD would still be strengthened by an increase in need for jobs and services, which would in turn increase the demand further for the intended reinvigoration of the Liverpool CBD to meet the needs of residents.

- The planning proposal is situated on a site without any notable tree canopy cover or general use. The landscape concept prepared by Clouston Associates demonstrates that the planning proposal would enhance urban tree canopy cover, provide permeability and connectivity with through-site links, street activation, casual surveillance, positive presentation with the road networks and allow the potential for a high quality environmentally sustainable outcome.

Consequently, it was submitted that there was merit in the planning proposal on the site.

Planning Proposal Strategic Merit – Update 2022

Given the four years since the original planning proposal lodgement, for the rezoning review process it is considered a worthwhile exercise to detail how the housing data has evolved.

An additional 8,250 dwellings were imposed as the housing target for the Liverpool LGA under the Western City District Plan released in March 2018. “Connected Liverpool 2040”, the completed version of the Liverpool Council Local Strategic Planning Statement (LSPS) dated March 2020, detailed a more specific population and dwelling forecast based on Forecast.id data and data supplied from the Liverpool Local Housing Study 2019 prepared by SGS Economics and Planning. This additional data detailed a 9,541 dwelling requirement over the 2016-2021 period, with this increasing to 9,982, 12,371 and 11,558 dwellings required over the subsequent 5 year periods ending in 2036 for a total of 43,452 dwellings over the period (refer to Figure 2 below).

Population and dwelling forecast

| Year | 2016 | 2021 | 2026 | 2031 | 2036 |
|---|---------|---------|---------|---------|---------|
| Population | 212,232 | 242,817 | 276,970 | 319,304 | 358,871 |
| Total dwelling demand | 67,738 | 77,279 | 87,261 | 99,632 | 111,190 |
| Additional dwellings required over five years | | 9,541 | 9,982 | 12,371 | 11,558 |

Sources: Population – Forecast population projections (Forecast.id);
Dwellings and additional dwellings – Liverpool Local Housing Study 2019 (SGS Economics and Planning).

Figure 2: Population and dwelling forecast (Source: Liverpool LSPS p. 44)

The Local Housing Study, therefore, indicated a higher-than-expected target than initially prescribed under the District Plan and a continual increase in the dwellings completed requirement over the next 10-15 years.

Analysis of the data available from the Department of Planning's Metropolitan Housing Monitor for the 2016-2021 period indicates that a total of 14,688 dwellings were approved between July 2016 and June 2021. Of those approved, only 9,591 dwellings were completed. While some time lag is inevitable between approval and completion, the immediate comparison suggests a 65.3% conversion rate of approvals to dwellings. This is generally consistent with the previous 4 years where 8,662 dwelling approvals were granted and 5,913 dwellings were completed between July 2012 and June 2016, a rate of 68.3%.

Importantly, the data suggests that the Liverpool LGA reached their housing target by only 50 dwellings total. The 2021-2026 target of 9,982 dwellings and then the 2026-2031 target of 12,371 dwellings will require a further increase in dwellings completed than the 2016-2021 period and, by consequence, those approved. At the highest conversion rate mentioned above of 68%, approximately 14,700 dwelling approvals must be issued between 2021-2026 and 18,200 between 2026-2031 to achieve the dwelling targets.

As such, there remains a need for Liverpool Council to strongly consider how their housing targets will be reached rather than letting the market resolve itself entirely based on the existing zoned land in the Growth Centres and the existing high density zoned land closer to the CBD. It is worthy to acknowledge that there are other factors to be considered in how those housing targets will be achieved, including:

- Delays in the provision of key infrastructure such as sewage in the Austral portion of the Austral & Leppington North Precinct of the Growth Centres has

led to a slowdown in the dwelling completions in the area. Portions of the Growth Centres have seen a 2-3 year delay in the delivery timeframe which has cooled progression of the development in the affected areas.

- Amendment 52 of the Liverpool Local Environmental Plan 2008 sought to provide additional uplift in the Liverpool CBD to double the population of the CBD. The best-case scenario generation of dwellings the amendment would create was up to 7,000 dwellings, which relied upon lot consolidation or co-operation between landowners and developers. The amendment was gazette on 5 September 2018 after being a draft legislation for over 12 months. Despite these controls having been available for over 5 years in at least a draft form, only six concept development applications have been submitted, five approved and only one has eventuated into a development application for the physical built form, being Council's own application with no residential component (the Liverpool Civic Place development). The slow uptake of these controls for residential development will further impact on the capacity of the CBD to contribute to the achievement of the housing targets.

It is our view that the external factors mentioned above that affect the delivery of housing supply where it has been anticipated means that there is still a need for consideration toward alternative sites where housing may be delivered.

Conclusion

The positive attributes of the site mentioned above and within the planning proposal documentation remain applicable as they were at the time of lodgement.

Based on the above and the original submission, we are seeking the Department of Planning to reconsider our proposal which we submit has strategic merit and will positively contribute to the future of Liverpool. We are keen to meet with the Department to discuss the merits of our application further.

Should you have any questions, please do not hesitate to contact the undersigned.

Kind regards,

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