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PE7                      PROponent LED PLANNING PROPOSAL - 94-98 COSGROVE ROAD, STRATHFIELD SOUTH (LOT 100 DP 862635)

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## RECOMMENDATION

1. That Council resolve to not progress the Planning Proposal for land at 94-98 Cosgrove Road, Strathfield South (Lot 100 DP 862635) which is seeking to amend the Strathfield LEP 2012 by:
  - Increasing the Height of Buildings (HOB) from 12m to 35m, and
  - Increasing the Floor Space Ratio from 1:1 to 1.6:1
2. That the proponent be advised of Council's decision.

## PURPOSE OF REPORT

This report provides an assessment of the strategic and site-specific merit of a proponent led Planning Proposal for land at 94-98 Cosgrove Road, Strathfield South (Lot 100 DP 862635) which is seeking to amend the Height of Buildings and FSR under Strathfield LEP 2012.

## REPORT

### Proposed Amendments

A draft Planning Proposal (PP) applies to the site known as Nos 94 -98 Cosgrove Road, Strathfield South (Lot 100 DP 862635) (Figure 1) and seeks to amend the Strathfield LEP (SLEP) 2012 as follows:

- Increasing the Height of Buildings (HOB) from 12m to 35m, and
- Increasing the Floor Space Ratio from 1:1 to 1.6:1

The site is a large single landholding with an area of approximately 43,100m<sup>2</sup> and has frontage to Madeline Street, Hope Street and Cosgrove Road.

A copy of the draft Planning Proposal is included at Attachment 1.



**Figure 1 – Subject Site**

The site is located along the southeastern boundary of the South Strathfield/Enfield Employment Precinct.

**The Precinct is located between Liverpool Road to the north, the Cooks River and Cox's Creek to the east and south-east, Punchbowl Road to the south and Roberts Road to the West.** The Precinct has a wide range of uses and is primarily characterised by transport, warehousing/distribution, manufacturing, professional services, wholesale trade and urban services. The site is adjoined on three sides with other industrial uses and is zoned E4 General Industrial zoning under Strathfield Local Environmental Plan (SLEP) 2012.

**To the south of the site, within 65m is Cox's Creek, Cooke Park (on the eastern side of Madeline Street) and Begnell Field (on the western side).** Within 115m to the south of the site is a low-density residential neighbourhood, with single and two storey dwellings fronting Madeline Street.

The PP is supported by a Concept Design Report (CDR) which comprises a three-level warehouse or distribution centre with a total gross floor area (GFA) of 68,960m<sup>2</sup> and building height of 34.6m. It also includes associated infrastructure including heavy vehicle ramps and landscaping (Figure 2).



Figure 2 – Photo montage from the IRS

The proposed amendments aim to facilitate multi-level (3 stacking levels) warehousing. This type of logistics warehouse has become increasingly common across metropolitan Sydney as pressure on industrial land supply increases. There are a number of examples in the St Peters, Alexandria and Mascot area of the city. The majority of these are not at the height proposed by the Applicant.

### Key Considerations

The site is strategically located near the Enfield intermodal in an established industrial area. Retention and utilisation of existing well located industrial land is a strategic objective throughout all tiers of the applicable strategic planning framework.

Amending the height and FSR permitted on the site to facilitate multi-level warehousing has strategic merit, however, the proposed 35m height is a significant departure from the existing 12m height limit under Strathfield LEP.

A 35m high building, which would be comparable in height to a 10-storey residential flat building, and with no transition in height, would have a significant visual impact for the low-density residential areas to the south (**maximum height of 9.5m**), as well as open space areas located along Cox's Creek and the Cookes River.

**The proposal's longitudinal (east-west)** dimension is 208.1m, would result in a very large southern façade orientated towards residential areas and public open spaces. Noting the need for large floor plates and stacking heights, physical articulation (via through breaks in the building and/or separation of the building and upper-level setbacks) would be difficult to achieve. When combined with the proposed height, any future building on this site, which will have long and expansive facades, will be significantly intrusive, particularly when viewed from the residential and open space areas.

Council, in discussions with the Proponent advised that the proposed 35m height could not be supported and suggested that a maximum 25m height would be more appropriate in this location. This would allow for

more appropriate height transition between the site and residential areas to the south and would result in a building that was less visually intrusive and closer in height to a mature canopy tree.

The proponent has advised that they are not willing to consider a reduction in the proposed height from 35m to 25m and have requested that the Planning Proposal be determined as submitted.

A detailed assessment report on the draft Planning Proposal was considered by the Strathfield Local Planning Panel, at its meeting on 10 April 2025. The advice of the Local Planning Panel is discussed further in this report.

### Impacts of the Planning Proposal

The CDR submitted with the PP and prepared by Nettleton Tribe, contains a conceptual built form to illustrate future development outcomes based on the proposed HOB and FSR (refer to Figures 3-6 below for elevations and perspectives). The design concept, principles and design considerations such as setbacks and access are also included in the CDR.



Figure 3 – Northern Elevation



Figure 4 – Eastern Elevation



Figure 5 – Southern Elevation





Figure 6 – Western Elevation



Figure 7 – Ground Floor Plan



**Figure 8** – Perspective, Corner of Cosgrove Road and Hope Street



**Figure 9** – Perspective, Corner of Hope Street and Madeline Street

### Building height and mass

The draft Planning Proposal seeks to amend the maximum HOB from 12m to 35m metres to facilitate the redevelopment of the site for a three (3) storey industrial and warehouse building. This represents a 191.6% increase to the existing height under the Strathfield LEP. A 35m tall building is equivalent to a 9-10 storey residential flat building, which exceeds the height of any built form in the locality.

The draft Planning Proposal is supported by a Visual Impact Assessment (VIA), prepared by Geoscapes which shows the impact of the concept building in the Urban Design Report from 12 vantage points in the immediate locality. The 10 vantage points are shown below in Figure 10.



Figure 10 – Viewpoints in the Applicants VIA

From the west, north and north-east, the VIA concludes that the visual impact will generally be low. The VIA establishes that these spaces generally have a low sensitivity in that the views are from existing industrial areas towards an existing industrial site. The VIA suggests the magnitude of change would be low as the building would not look out of place in its industrial context. Council agrees with the findings of the VIA in this regard.

From the south and south-east where low density residential dwellings are located, the VIA establishes moderate to high visual impacts. A summary of the VIA's assessment of each viewpoint is provided below.

Viewpoint	Sensitivity	Magnitude of Change	Visual Impact
<u>Viewpoint 1</u> (Jct of Cosgrove Rd & Cleveland St)	Low	Low	Minor
<u>Viewpoint 2</u> (Int of Cosgrove Rd and Blanche St)	Low	Low	Minor
<u>Viewpoint 3</u> (Begnell Field)	Low	Low	Minor/Negligible
<u>Viewpoint 4</u> (Madeline Street Near No.122)	Medium	High	Moderate
<u>Viewpoint 5</u> (Cookes Skate Park)	Medium	Low	Minor
<u>Viewpoint 6</u> (Excelsior Avenue near No. 11)	Medium	Very Low	Minor/Negligible
<u>Viewpoint 7</u> (Int of Bede St and Anselm St)	High	Very Low	Minor



Viewpoint	Sensitivity	Magnitude of Change	Visual Impact
<u>Viewpoint 8</u> (Int of Mainland Rd and Wentworth St)	Very Low	Low	Negligible
<u>Viewpoint 9</u> (Madeline Street Near No.116)	Medium	Very High	High/Moderate
<u>Viewpoint 10</u> (Dean Reserve)	Low	Medium	Minor
<u>Viewpoint 11</u> (Near Jct of Cosgrove Rd and Hope Street)	Low	Medium	Minor
<u>Viewpoint 12</u> (Close to Int of Madeline Street and Hope Street)	Low	High	Moderate/Minor

**Table 3** – Summary of viewpoints and magnitude of change

Council considers that the visual impacts from the proposed development will be greater than what has **been presented in the Applicant's VIA. The concept design proposes a building that will have a longitudinal** (east-west) dimension of 208.1m, resulting in a very large southern façade orientated towards residential areas and public open spaces. The eastern boundary dimension is approximately 185m which presents similar bulk and scale concerns. These large expanses of wall, combined with a maximum building height of 35m will result in a significantly bulky building, which when viewed from the open space and low-density residential precinct will have a significant visual impact.

Noting the need for large floor plates and stacking heights, physical articulation (via through breaks in the building and/or separation of the building and upper level setbacks) will have a limited effect on mitigating bulk and scale. The VIA presents a number of before and after images that depict the scale of change. As a reference, the images for Viewpoints 5 and 9 are shown below.





Figure 11 – Viewpoint 5 (Cookes Skate Park) from the Applicant's VIA



Figure 12 – Viewpoint 9 from the Applicant's VIA

However, the images show small portions of a building that will have a 200m long southern façade and similar length along the eastern façade. The viewpoints show a narrow view window that indicates the visual impact of the building will be mitigated by trees and buildings in the foreground. This is considered to

underplay the presence of the building in the local environment, which currently features a 12-15m height plane across industrial areas and 9.5m (at the highest) plane across residential areas.

Viewpoints 9 and viewpoint 4 are also considered in isolation from the wider residential area south of the site. Discussion of these limited viewpoints underplays the impact of the building on numerous residential streets and dwellings located along Chisolm Street, Blanche Street, Birriwa Avenue, Chatfield Avenue and potentially further afield on Water Street.

In relation to Viewpoints 4 and 9, the VIA proposes a medium sensitivity based on a criteria that places limited value on the existing scenic context which incorporates canopy trees that screen most industrial buildings. The leafy outlook for residents and travellers along the local road network contributes to a higher sensitivity than is attributed in the VIA.

The outcome generated by this Planning Proposal would result in a new focal point for residents south of the site, with direct and close range views of a building more than twice the height of existing industrial buildings across a large horizontal extent. Therefore, the magnitude of change is expected to be high or very high.

As part of the pre-scoping response letter, Council provided suggested viewpoints, which have been addressed in the submitted VIA. However, several of the suggested viewpoints have been used to demonstrate low visual impacts due to localised view obstructions. For example, Viewpoint 6 has been given a minor/negligible impact due to a crop of mature trees directly opposite this viewpoint. However, numerous dwellings south of this point along Chisolm Street look across from Cooke Park, where the new development would introduce a large structure well above the background canopy line. Figure 35 below shows a google street view position near 1 Chisholm Street that presents a different sensitivity and impact considering the unobstructed views across Cooke Park. The tip of the existing 15m building at the site can be seen in the distance.



**Figure 11** – Google street image from a position near 1 Chisholm Street



**Figure 12** – A site visit photo taken from inside the park

The sensitivity applied to open space areas (in Viewpoints 3 and 5) underplays the scenic value of users of these spaces. The local open spaces provide green space outside of organised sport and all users have the potential to enjoy these spaces in the current visual setting where buildings are mostly screened by the tree canopy line. In considering the magnitude of change, the VIA presents narrow viewpoints that focus on areas of canopy trees in the foreground.

In reality, the building will be a significant new focal point from these spaces where there are numerous unobstructed views of the site or views from the other side of Cooke Park and various other points in Begnell Field.

#### Veracity of the VIA

During the assessment, Council contracted Audax Urban to undertake a peer review of the submitted VIA. **Audax Urban provided confirmation of Council's visual impact concerns, finding that the proposal would have greater levels of visual impact than that described in the Applicant's VIA.** A copy of the peer review undertaken by Audax Urban is included at Attachment 3.

Audax Urban also questioned the methodology used by Geoscapes, noting that no proof of the veracity of **the montages has been provided, and, at best, these can be described as artist's renditions and their accuracy cannot be ascertained as they are not court certifiable montages.**

This brings into question all other viewpoints, including those on the northern side of the Cooks River, where there may be other topographical high points that present greater visual impacts than the discussion orientated around Viewpoint 7.

#### **Façade design and setbacks**

The Planning Proposal is supported by the CDR and Site Specific DCP that establish urban design benchmarks for the proposed development, as well as minimum setbacks as follows:

- a) 10m along Cosgrove Road;
- b) 7m along Hope Street; and
- c) 5m to Madeline Street.

These features of the development are essential to mitigating bulk and scale for multi-level warehousing development. However, as noted above, the setbacks and landscaping within those setbacks would not have a mitigating effect on a 35m high building considering the visual impacts are primarily from areas outside of the adjoining local road network.

Façade treatments would not be able to modulate the building to a point where it would not be a new visual focal point for surrounding residential and open space areas and the ability to create significant breaks in the façade and step the development is limited by the nature of the land use.

**Audax Urban also questioned the VIA's use of architectural treatments to downplay visual impacts from certain viewpoints.** Architectural treatments at the Planning Proposal stage are a variable that should not be used to reduce visual impacts in the discussion of impacts from a general building envelope.

Notwithstanding, articulation of the built form as presented has limited impact to a building of this scale when combined with the need for regular floor plates.

#### **Landscaping, deep soil and canopy cover**

The concept landscape plan submitted with the Planning Proposal establishes that the concept scheme would retain 48 trees within the Site and plant 145 trees, resulting in 193 trees and a canopy cover of 9.7%. This is a notable increase from the existing canopy cover at the site which is approximately 2.5%. However, **this falls short of Council's 20% target and the State Government's City wide 40% target.**

The setbacks proposed generally allow for mature canopy spread, although Council's Urban Forest Supervisor outlined a 6m minimum should be applied. However, mature canopy trees would have minimal contribution to mitigating bulk and scale under the proposed height.

### **NEED FOR THE PLANNING PROPOSAL**

#### **Section A - Need for the Planning Proposal**

##### **Question 1 - Is the planning proposal a result of an endorsed LSPS, strategic study or report?**

No, this Planning Proposal is the result of a request from the landowner to increase the height and FSR to facilitate delivery of a warehouse.

##### **Question 2 - Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?**

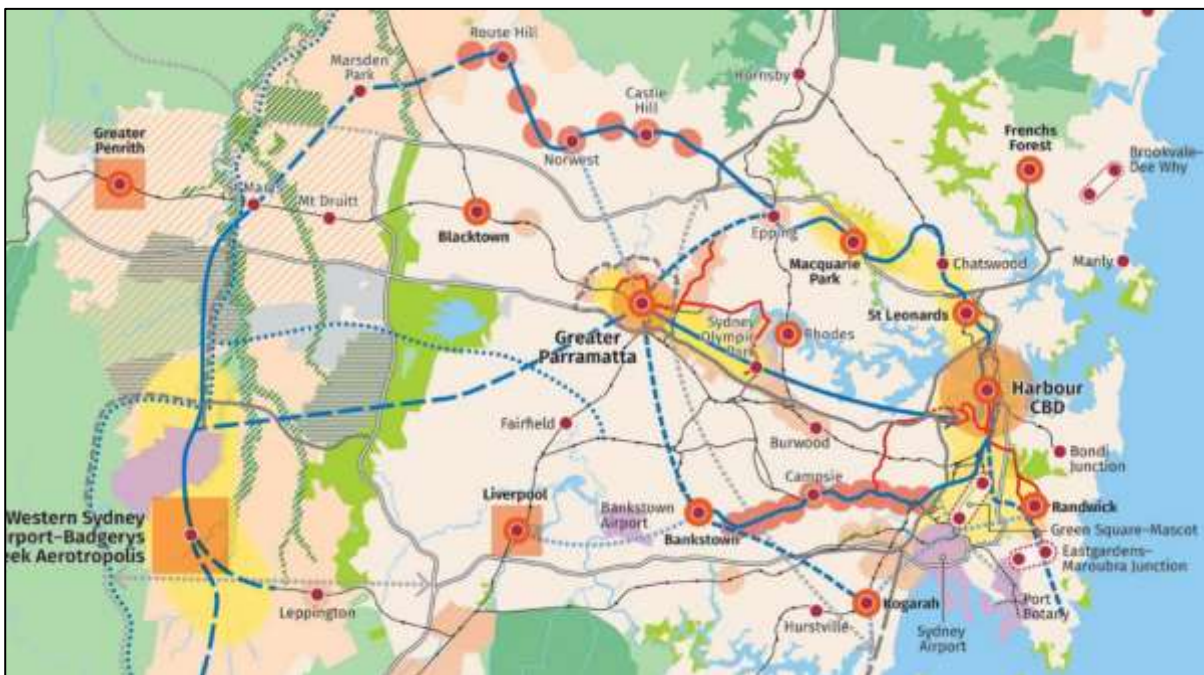


This is a site-specific Planning Proposal which is seeking to increase the height and FSR to facilitate a multi-level warehouse.

## Section B - Relationship to the strategic Planning Framework

**Question 3 - Is the Planning Proposal consistent with the objectives and actions of the applicable regional or sub-regional strategy (including any exhibited draft plans or strategies)?**

The Region Plan is the overarching strategy for growing and shaping the Greater Sydney Area. It sets a 40-year vision (to 2056) and establishes a 20-year plan to manage growth and change for Greater Sydney in the context of social, economic and environmental matters. It was adopted in March 2018 and seeks to reposition Sydney as a metropolis of three cities, being the Eastern Harbour City, Central River City and Western Parkland City. The Region Plan provides 10 high level policy directions supported by 40 objectives that inform the District Plans, Local Plans and Planning Proposals which follow in the planning hierarchy.



**Figure 39 – Greater Sydney Region Plan – A Metropolis of Three Cities**

The District Plan underpins the Region Plan and sets the 20-year vision for the Eastern City District through 'Planning Priorities' that are linked to the Region Plan.



Figure 40 – The Eastern City District Plan

The Planning Proposal is consistent with several planning priorities and objectives within the Region Plan and District Plan. Of particular relevance are the following:

- *Region Plan - Objective 23: Industrial and urban services land is planned, retained and managed*
- *Region Plan - Objective 16: Freight and logistics network is competitive and efficient*
- *District Plan - Planning Priority E12: Retaining and managing industrial and urban services land*
- *District Plan - Planning Priority E9: Growing international trade gateways*

Consistency with these Objectives and Planning Priorities is the result of two fundamental features of the proposal:

- The site is strategically located within the vicinity of the Enfield Intermodal, responding to demand for industrial land, capable of supporting freight and logistics, with access to Port Botany.
- It features the retention of industrial land and intensification of the use through multi-level warehousing and additional floor area.

However, these two points do not justify multi-level warehousing at a height of 35m. The assessment of the **Planning Proposal's** site-specific merit has demonstrated that the height proposed for the site and use will introduce a building that is out of character with the locality and will have a negative impact on how local residents and visitors experience the Strathfield South residential area to the south of the site due to visual impacts.

The Region Plan and District Plan both address the need for a city of great places achieved through a well-design-built environment. Planning Priority E6 in the District Plan includes details on the need for great places to be attractive and details on place-based planning in Action 18 require Council's to recognise and celebrate the character of places in decision making.

The Planning Proposal will facilitate a development that would create a new local visual landmark and due to its prominence, detract from the local character. The future building would sit well above the tree canopy line which defines views from surrounding residential and open space areas.

Due to the nature of the development, opportunities to mitigate bulk and scale through high quality urban design are limited. With these site-specific impacts and limitations in mind, the Planning Proposal is inconsistent with place based objectives and Planning Principles in the Region and District Plans.

**Question 4 - Is the planning proposal consistent with a council LSPS that has been endorsed by the Planning Secretary or GCC, or another endorsed local strategy or strategic plan?**

The Strathfield LSPS contains planning priorities and actions of which represents Council's 20-year vision and strategy for the LGA's future direction, and contains directions about infrastructure, liveability, productivity and sustainability. It draws from Region and District Plan and implements the planning priorities identified from these larger strategic documents at a local level.

The Planning Proposal relates most directly to Planning Priority P10 under the Productivity section:

- *P10 - Industrial land and precincts deliver District and local urban services and provide activated spaces with minimal impact on neighbourhoods*

Similarly to the relevant planning principles in the Region and District Plan, the Planning Proposal addresses the need for retention of industrial land via the intensification of the site fundamental to the Planning Proposal.

However, the LSPS also provides amenity and place-based considerations to minimise the impacts on local neighbourhoods as industrial lands evolve. Under P10, the LSPS establishes that *development and renewal of industrial and commercial areas must support the LGA's attraction as a desirable place to live and work.*

In this regard, the Planning Proposal is inconsistent with the LSPS, as the proposed height would have a negative effect on local character and amenity for the Strathfield South residential area.

To a lesser extent, the Planning Proposal is relevant to P16 and Action 104 shown below:

- *P16 - A healthy built environment delivers sustainable and resource efficient outcomes*
- *Action 104 - Continue to work with industrial landowners to implement priorities and sustainability actions for industrial sites (priorities to reduce heat island effect such as tree planting, water runoff, noise and pollution impacts to adjoining land uses)*

As noted above, the Concept Design falls short of canopy cover targets for the greater Sydney region and the Strathfield LGA.

**Question 5 - Is the Planning Proposal consistent with any other applicable State and regional studies or strategies?**

The following State strategies are applicable to the Planning Proposal:

**i) Future Transport Strategy 2056**

*The Future Transport Strategy 2056 sets out the NSW government's vision for transport in a growing and changing state. It guides the community on strategic directions for future planning integrated with evolving transport networks throughout the greater Sydney metropolitan area and the state. The strategy delivers a framework that informs place-based planning and policy decisions to achieve successful outcomes, aiming to connect communities to the city and state shaping infrastructure and services pipeline.*

*The strategy seeks to ensure that freight networks and supply chains are efficient and reliable (E1). It identifies that the lack of adequate infrastructure, facilities and land around intermodals can impact the efficiency of supply chains, cause delays for freight operators, and limit capacity. The encroachment of residential land on existing strategically located industrial lands is similarly a concern that places pressure on freight routes connecting ports, airports, employment lands and intermodal.*

**ii) NSW State Infrastructure Strategy 2022-2042 – Staying Ahead**

*The NSW State Infrastructure Strategy 2022-2042 – Staying Ahead identifies infrastructure needs and strategic priorities for the State over the next 20 years, building on the recommendations made by the previous strategy. NSW Government*

*strategies, policies and reform initiatives underpin the development of the strategy, which sets out nine (9) long-term objectives for Infrastructure NSW.*

*The strategy seeks to improve freight efficiency, security and capacity to support NSW's industries and supply chains, in addition to supporting existing, and emerging knowledge and manufacturing industries in dedicated precincts with high-quality infrastructure.*

The Planning Proposal is consistent with these strategies as it seeks to retain and intensify existing industrial land in close proximity of the Enfield Intermodal. However, this does not necessitate the height proposed.

**NSW Government Architects 'Better Placed' and 'Greener Places'**

*Better Placed was released in September 2017, as a strategic document to guide the future of urban environmental planning such that it works towards the creation of better designed places throughout NSW.*

The Proponent has indicated that the Planning Proposal is consistent with Greener Places, however design guidance within the Strategy indicates a much higher (40%) canopy cover target than what is proposed in the Concept Design and achievable under the setbacks proposed.



***Question 6. Is the Planning Proposal consistent with applicable State Environment Planning Policies?***

The Planning Proposal is consistent with the applicable State Environmental Planning Policies as shown below.

State Environmental Planning Policy	Consistency
State Environmental Planning Policy (Resilience and Hazards) 2021	<p>Yes - Chapter 4 of the Resilience and Hazards SEPP aims to promote the remediation of contaminated land.</p> <p>A Preliminary Site Investigation has been submitted with the Planning Proposal and concludes that the Site can be made suitable for the future land use and development from a contamination perspective.</p>
State Environmental Planning Policy (Transport and Infrastructure) 2021	<p>Yes - Future development on the site would be considered a traffic generating activity under Section 2.122 of the Transport and Infrastructure SEPP requiring the consent authority to refer the Development Application to Transport for NSW (TfNSW).</p>

**Table 4 – State Environmental Planning Policies**

***Question 7 - Is the Planning Proposal consistent with the applicable Ministerial Directions (Section 9.1 Directions) or key government priority?***

The Planning Proposal is consistent with the applicable Ministerial Directions as shown below.

Ministerial Direction	Consistency
4.1 Flooding	<p>The Planning Proposal includes a Flood Impact assessment that demonstrates the site could be developed to be to accommodate the probable maximum flood levels established in <b>Council's Cooks River and Cox's Creek Flood Study</b>. <b>The Planning Proposal is consistent with Council's adopted flood study.</b></p> <p>The Planning Proposal does not seek to rezone land and does not seek to introduce any new special provisions into SLEP 2012.</p>
4.4 Remediation of Contaminated Land	<p>The Planning Proposal is supported by a Preliminary Site Investigation report which outlines that a detailed site investigation (DSI) is required.</p> <p>It is noted that, under the Ministerial Direction, the DSI is not required at this stage as the Planning Proposal does not change the zoning of the land. A DSI can be a requirement following gateway approval of the Planning Proposal or more suitably can be addressed during the development application process.</p>
4.5 Acid Sulfate Soils	The Acid Sulfate Soils Map – Sheet ASS_06 of Strathfield LEP 2012

	<p>indicates that the site is classified as Class 5 where development consent is required for works within 500m of adjacent Class 1, 2, 3 or 4 land that is below RL 5 and by which the water table is likely to be lowered below RL 1 on adjacent Class 1, 2, 3 or 4 land. Class 4 land is located approximately 50m to the south and east of the Site, however, the topography is above RL 5 AHD.</p> <p>In addition, Council has adopted the Model LEP clause under Clause 6.1 of the Strathfield LEP, meaning that Direction 4.5(4) does not apply.</p>
7.1 Employment Zones	The Planning Proposal is consistent with the Ministerial Direction as it retains and does not reduce existing industrial employment land.

Table 5 – Ministerial Directions

## Section C – Site-Specific Merit

***Question 8 - Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected because of the proposal?***

The subject site is located centrally within an existing industrial precinct and is unlikely to contain any critical habitats or threatened species, populations or ecological communities or their habitats. Council's records and GIS mapping do not indicate any environmentally sensitive land at the site or within close proximity of the site.

***Question 9 - Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?***

An assessment of the environmental impacts is provided in Section 6 of this report. The salient environmental consideration relates to visual impacts from the expected bulk and scale of the proposal. The size of the subject site will result in long and expansive facades when combined with the 35m height and will have a detrimental effect on the character of the locality due to visual impacts. The submitted VIA does not accurately capture the physical presence of a building of this scale and form on a large portion of the Strathfield South residential area and open spaces along the Cocks Creek and Cooks River.

***Question 10 - Has the Planning Proposal adequately addressed any social and economic effects?***

The Planning Proposal is supported by a social and economic impact (SEI) assessment.

This document outlines the economic benefits of the Planning Proposal, focusing on job creation and economic output. The SEI presents a base case, reflecting the current potential of the site, to highlight the economic benefits of the PP. While this comparison shows clear economic advantages, it remains a simplistic one. Of more relevance would be comparisons with similar multi-level warehousing developments in comparable settings, particularly in the context of discussions about the feasibility of multi-level warehousing at a reduced height on the site.

In this regard, Council requested during the assessment that the Proponent provide any feasibility studies conducted for the site, noting that there are numerous examples of two-storey warehouses within the trade

and logistics corridor east of the site in other local government areas. However, this information was not provided to Council.

The Proponent asserts that the economic benefits of the Planning Proposal offer significant public value. However, the Council disagrees, pointing out that the Planning Proposal fails to address the need for local infrastructure improvements, lacks robust sustainability initiatives and commitments, and does not meet the canopy tree targets set by the relevant Planning Policies.

The SEI also examines the social impacts of the Planning Proposal. It is agreed that the proposal will not significantly affect the general way of life, culture, community, or access. However, the SEI indicates the impacts on the surroundings for nearby residential receivers can be mitigated through architectural quality and articulation in the detailed design phase. Council's assessment of the visual impacts from the Planning Proposal do not align with this assumption.

#### Section D – Infrastructure (Local, State and Commonwealth)

##### *Question 11 - Is there adequate public infrastructure for the Planning Proposal?*

The Proponent's Service Infrastructure Assessment indicates that the site is suitable serviced. This aligns with the sites position in an existing industrial area within close proximity to the Enfield Intermodal and arterial roadways Punchbowl Road and Liverpool Road which can be accessed via Cosgrove Road.

#### Section E – State and Commonwealth Interests

##### *Question 12 - What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?*

State agencies were consulted as part of the pre-scoping process. Their responses to the pre-scoping material are outlined below.

Authority	Comment
Transport for NSW	Comments provided related to details to be included in a Traffic Impact Assessment. The Applicant has undertaken additional consultation with TfNSW to determine appropriate growth rates for traffic impact assessments.
NSW Ports	NSW Ports outlined that comments would be provided at formal exhibition stage.
Sydney Trains	No response received.
Ausgrid	Ausgrid provided comments relating to requirements for a services and utilities impact assessment.
Sydney Water	Sydney Water provided high level comments and established that further comments may be provided at formal exhibition stage.

**Table 6 – Pre-scoping State Agency Consultation**

#### Consistency with Applicable Strategic Planning Policy

The Planning Proposal has been assessed against the following strategic planning policy in accordance with the requirements of Section 2B in the NSW Government's Local Environmental Plan Making Guidelines:

- NSW Government Greater Sydney Region Plan
- Eastern City District Plan
- Strathfield Local Strategic Planning Statement (LSPS)
- NSW Government Future Transport Strategy 2056
- NSW State Infrastructure Strategy 2022-2042 – Staying Ahead

Each of these policies features objectives and priorities that establish the need for retention and utilization of well-located industrial land. The Planning Proposal fulfills these priorities due to two fundamental features of the proposal:

- The site is strategically located within the vicinity of the Enfield Intermodal, responding to demand for industrial land, capable of supporting freight and logistics, with access to Port Botany.
- It features the retention of industrial land and intensification of the use through multi-level warehousing and additional floor area.

However, these two points do not justify multi-level warehousing at a height of 35m. The assessment of the **Planning Proposal's** site-specific merit has demonstrated that the height proposed for the site and use will introduce a building that is out of character with the locality and will have a negative impact on how local residents and visitors experience the Strathfield South residential area to the south of the site due to visual impacts.

The Region Plan, District Plan and Strathfield LSPS all identify the need for place-based development that allows for great places to be delivered. The Planning Proposal will facilitate a development that would create a new local visual landmark and due to its prominence, detract from the local character. The future building would sit well above the tree canopy line which defines views from surrounding residential and open space areas.

### **Advice of Strathfield Local Planning Panel**

The Planning Proposal was considered by the Strathfield Local Planning Panel (LPP) at its meeting on 11 April 2025. The following advice was provided:

*The Panel recommends that the Planning Proposal for land at 94-98 Cosgrove Road, Strathfield South (Lot 100 DP 862635) to amend the height and FSR in the Strathfield Local Environmental Plan 2012 should not progress to the Department of Planning, Housing and Industry under Section 3.34 of the Environmental Planning and Assessment Act 1979.*

*The Panel noted the Council commissioned an independent peer review of the proponent's visual impact assessment, and agreed with the conclusions in the assessment report regarding visual impacts arising from the likely future bulk and scale resulting from the height and length of the building that could be accommodated by the requested Planning Proposal. This is especially an issue for nearby residential and open space areas to the south of the site.*

*Otherwise, the Panel saw some strategic and site-specific merit in accommodating a reasonable re-development of the site, given its large single ownership in a strategically important industrial zone. However, this needs to be*



*balanced with potential impacts, particularly close to the edge of the industrial zone, proximate to residential and open space uses. This balance of considerations favours some additional height and density at the site, but not to the degree sought by the proponent.*

## Conclusion

The Planning Proposal has strategic merit in that it protects and utilises existing well-located industrial land.

Council acknowledges the significance of preserving and enhancing industrial land near the Enfield Intermodal. On a broader scale, the DPHI is currently conducting a thorough review of its Industrial Lands Strategy, which may lead to a Council-led comprehensive review of industrial land. This review will aim to establish appropriate heights and Floor Space Ratios (FSRs) that support modern industrial warehouse stacking heights, including multi-storey warehousing at suitable levels. Additionally, this review will be **complemented by updates to Council's Development Control Plan (DCP).**

**The Council's recognition of the need for height increases in modern industrial developments is reflected in** its support for several 4.6 variation requests during Development Application assessments, including one for the site at 41 Roberts Road on the western side of the Intermodal. This site, developed by Goodmans, saw a 48% increase to the 12m height limit, allowing for a building height of 17m.

However, the proposed 35m height represents a significant departure from the current height patterns of buildings in the surrounding industrial area. It will create a dominant visual focal point that could undermine the setting and character of the Strathfield South area. While physical articulation, such as breaks in the building or upper-level setbacks, may help reduce the bulk and scale, these measures will have limited impact given the large size and scale of the proposed structure, which at 35m will be equivalent to a 9-10 storey residential flat building

During the assessment of the Planning Proposal, Council informed the Proponent that a maximum height of 25m could be supported. This height would facilitate appropriate transitions between the site and the residential areas to the south, while allowing the building to be at or slightly above the existing and future canopy tree heights. However, the Proponent has stated that a 25m height limit does not align with their future vision for the site.

**Accordingly, in consideration of the Planning Proposal's inconsistency with place based strategic planning** objectives and anticipated visual impacts, Council recommends that the Planning Proposal for land at 94-98 Cosgrove Road, Strathfield South (Lot 100 DP 862635) to amend the Strathfield Local Environmental Plan 2012 should not progress to the Department of Planning, Housing and Industry under Section 3.34 of the *Environmental Planning and Assessment Act 1979*.

## FINANCIAL IMPLICATIONS

There are no financial implications.

## ATTACHMENTS

1. [Planning Proposal - 94-98 Cosgrove Road, Strathfield South](#)