

11 February 2025

2230876

Joe Gillies
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Strathfield NSW 2135

Dear Joe,

**Response to Request for Additional Information
Planning Proposal PP2024.2 (PP-2024-2431) – 94-98 Cosgrove Road, Strathfield South**

We write on behalf of Centuria Capital Limited ('Centuria' or 'the Applicant') in response to the Request for Additional Information issued by Strathfield Council (Council) on 20 December 2024 in relation to a Planning Proposal PP2024.2 (PP-2024-2431) at 94-98 Cosgrove Road, Strathfield South (the Site).

The Planning Proposal seeks to enable the future development of a multi-level warehouse or distribution centre by amending the Height of Building and Floor Space Ratio development standards under the *Strathfield Local Environmental Plan 2012* (Strathfield LEP 2012) for the Site. The matters raised by Council in the Request for Additional information included the proposed height, visual impact, setbacks, sustainability, and public benefit. A meeting was held with Council on 3 February 2025 to discuss the subject matters, which has helped inform the Applicant's responses.

The Applicant's response to each of the matters raised by Council is provided in **Table 1** on the following page. It is supported by the following supplementary material that this letter should be read in conjunction with:

- Racking Comparison prepared by Nettletontribe Architects (**Attachment A**);
- Updated Planning Proposal Report prepared by Ethos Urban (**Attachment B**);
- Updated Concept Design Report prepared by Nettletontribe Architects (**Attachment C**);
- Updated Concept Landscape Plan prepared by Geoscapes (**Attachment D**); and
- Updated Draft Site-Specific DCP prepared by Ethos Urban (**Attachment E**).

We trust that this response addresses the matters raised by Council. Should you have any queries, please do not hesitate to contact us.

Yours sincerely,



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Table 1 Response to Request for Additional Information

Comment	Applicant Response												
1. Proposed Height													
<p>The proposed height will allow for a building that will result in a significant visual impact to the existing dwellings located in Madeline Street, surrounding residential streets of South Strathfield, Bengell Field, Cooke Park and parts of the Cooks River (to the south of the subject site).</p> <p>Council has undertaken a review of comparable multi-level warehouses across Metropolitan Sydney, namely:</p> <ul style="list-style-type: none">• 45 Burrows Road Alexandria – 18m height (2 storey warehouse); and• 1-3 Burrows Road, St Peters – 30m height (3 storey warehouse) with floor to ceiling heights of approximately 7.6m <p>Council is wanting to understand, in terms of the context of the site and adjoining land uses, as compared to the above examples, the reason for the proposed height of 35m as it appears that a multi-level warehouse (3 storey) could be contained within a maximum height of between 27m - 30m.</p>	<p>The proposed height has been deliberately chosen to enable an additional rack of storage on each level. The examples provided by Council are located in close proximity to Sydney Airport and Port Botany where tenants are typically geared towards last-mile distribution and have freight move in and out of storage very quickly. The provision of an additional rack of storage in these locations is not typically required as speed of transport is prioritised and it is inefficient to store freight higher above the ground for a short duration.</p> <p>The additional rack of storage achieved on each level of a 35m scheme compared to a 30m scheme is illustrated at Attachment A and depicts the following differences:</p> <table><tr><th>Level</th><th>35m Building Height</th><th>30m Building Height</th></tr><tr><td>Level 2</td><td>5-6 racks</td><td>4-5 racks</td></tr><tr><td>Level 1</td><td>5 racks</td><td>4 racks</td></tr><tr><td>Ground Floor</td><td>5 racks</td><td>4 racks</td></tr></table> <p>The additional racking enabled by a 35m scheme is approximately 23% more efficient than the 30m scheme in regard to storage capacity.</p> <p>It is noted that the future development may incorporate reduced racking heights and subsequently reduced building height. A decision on the future target market of the development and subsequent racking heights will be made at the Development Application stage. The Planning Proposal and supporting Indicative Reference Scheme consider a 35m building height to enable flexibility to support a wide range of tenants.</p>	Level	35m Building Height	30m Building Height	Level 2	5-6 racks	4-5 racks	Level 1	5 racks	4 racks	Ground Floor	5 racks	4 racks
Level	35m Building Height	30m Building Height											
Level 2	5-6 racks	4-5 racks											
Level 1	5 racks	4 racks											
Ground Floor	5 racks	4 racks											
2. Visual Impact, Setbacks, Sustainability													
<p>As outlined above, the proposed height will result in a building that will significantly protrude above the existing roof lines of the surrounding industrial area and will be visually prominent when viewed from Madeline Street, Cooke Park, Begnell Field and from the northeast along the Cooks River.</p> <p>Consideration needs to be given to how building setbacks will assist in mitigating the visual impact, irrespective of whether the height limit is lowered or remains at 35m.</p> <p>An increased setback along Hope Street and Madeline Street to allow for significant mature landscaping would assist in softening the impact of the building when viewed from the south. Stepping of the building through upper level setbacks with green roofs would also soften views from the south.</p>	<p>The Applicant notes there are significant limitations in reducing the footprint of the future development as it will reduce the efficiency of the development and fail to offset the high costs associated with the construction of multi-level warehouse or distribution centres. Further, the provision of upper level setbacks will add significant complexity and subsequent cost to the development.</p> <p>In order to further minimise the visual impact and bulk and scale of the future development, the southern (Hope Street) building setback has been increased from 5m to 7m. The Indicative Reference Scheme has been updated accordingly with the building shifted to the north to enable a 7m building setback to the south. This change removes landscaping along the shared northern boundary to adjoining lots and instead enables the planting of larger canopy trees along the Hope Street which wasn't possible previously given the proximity of the building. The increased building setback will further screen the development to the immediate locality, as well as the residential and open space areas to the south-east of the Site. The Concept Design Report (Attachment C), Landscape Concept Plan (Attachment D), and draft Site-Specific DCP (Attachment E) have been all updated accordingly.</p>												

The below example demonstrates how upper level setbacks could be delivered:



VP10 and VP6 in the Visual Impact Assessment provide views of the eastern elevation. This view is not considered to capture the visual impact of ramping in the north-eastern corner. There is concern that the requirement in the DCP to have these ramps 'integrated' into the design does not require them to be hidden by the design or softened by landscaping.

The proposed 7m setback to the southern boundary will reduce the bulk and scale of the development to the south-east, as well as enabling the planting of significantly larger canopy trees. In combination, the proposed updates will achieve significant visual impact improvements to the sensitive receivers to the south-east, appropriately mitigating impacts identified by Council.

We note that Council has suggested the inclusion of development controls within the Strathfield LEP 2012 to further enforce compliance with development controls. The Applicant does not consider it appropriate to include non-discretionary development standards within the Strathfield LEP 2012 as the draft Site-Specific DCP (**Attachment E**) can perform an appropriate function. Inclusion of development standards within the Strathfield LEP 2012 would also limit flexibility for future built form design on the site should an alternate arrangement be refined that results in a better outcome.

The Applicant and visual impact expert (Geoscapes) selected viewpoints in accordance with Council's recommendations and an analysis of the surrounding landscape to accurately depict the visual impact of the Indicative Reference Scheme. The Visual Impact Assessment identifies that the north-eastern ramp will likely be partly visible from specific areas such as Dean Reserve (VP10).

The ramps have been purposefully positioned on the northern portion of the Site to mitigate visual and noise impacts to the closest residential areas to the south-east of the Site. The Indicative Reference Scheme includes landscaping and canopy coverage along the Madeline Street frontage that will screen the lower portions of the north-eastern ramp to the immediately surrounding area. Given the height of the ramp, landscaping cannot screen the upper portion of the ramp with architectural features to screen the ramp.

As depicted on the eastern elevation (see below) in the Concept Design Report (**Attachment C**), the Indicative Reference Scheme comprises perforated mesh screening that will screen heavy vehicle movements. It will also assist in 'integrating' the north-eastern into the building design to ensure it is a cohesive design element that does not stand alone separate from the building. It is noted there is a variety of design options and material that could be utilised to screen the ramp including light weight metal or batons/fins that would be determined during the design phase for a future development application.



In order to ensure that the architectural design is effective in screening/hiding the north-eastern ramp, the draft Site-Specific DCP (**Attachment E**) has been updated to incorporate additional provisions.

We note the ramp treatment approach is similar to that of Ascent on Bourke (SSD-32489140) referenced above by Council which positioned the ramps away from sensitive receivers to the south. It also utilises a low-level screen on the light vehicle ramp to effectively screen, but not enclose the ramp, as depicted in the following photos.



There is also opportunity to introduce art into the façade design. The views from Cooke Park and the Cooks River of the eastern and southern facades present opportunities to add artwork into the design and provide improved visual benefits for users of these public spaces.

The Applicant agrees with Council that there is an opportunity to introduce artistic elements into the façade design to increase the visual interest, particularly to public spaces to the east and south where the development can be partially viewed.

An artistic elements sheet has been prepared by Nettletontribe Architects and included within the updated Concept Design Report (**Attachment C**). It identifies exemplar façade options including mural artwork, green walls, and perforated mesh screens with custom patterns. The draft Site-Specific DCP (**Attachment E**) has been subsequently updated to require artistic elements to be incorporated into the façade design on the eastern and southern elevations.

Further consideration should be provided for how the development will address environmental performance. Managing the heat island effect will be aided by increased setbacks and upper level planting and / or green roofs. Solar panels and recycled water should also be considered.

The Applicant is committed to ensuring a high standard of environmental performance is delivered by the future development on the Site. The Indicative Reference Scheme would represent a significant investment that would need to align with the sustainability objectives of both investors, as well as national and international businesses that would be the target market for such a facility.

The Site currently is typical of industrial development in the past with very limited tree canopy coverage, noting that a significant portion of tree canopy coverage is provided within the street reserve around the Site. The redevelopment of the Site would significantly increase the provision of tree canopy coverage in addition to existing street reserve planting. The Indicative Reference Scheme includes the planting of 145 trees and retention of 48 trees, achieving 4,171m² of canopy coverage within the Site, equating to approximately 9.7% of the Site area.

Further, the proposed increased building setback along the southern boundary from 5m to 7m has enabled the planting of significantly larger canopy trees which were previously limited by the proximity of the building. Refer to the updated Landscape Concept Plan (**Attachment D**).

The future development would utilise the large roof area for the provision of solar panels, provide rainwater harvesting for irrigation and non-potable uses, and have infrastructure that meets the needs of businesses upon operation and into the future including Electric Vehicle (EV) charging. The draft Site-Specific DCP (**Attachment E**) has been updated to include additional provisions to help ensure a high standard of environmental performance is achieved.

3. Public Benefit

The proposal provides a significant uplift on the site with no delivery of real public benefit. Council acknowledges that the proposal will deliver additional jobs, close to the Enfield Intermodal Logistics Centre and in proximity to Sydney's key trade gateways, however this in itself does not represent public benefit.

Council, previously raised the issue of the delivery of public benefit as part of the pre-scoping response. A public benefit relates generally to the delivery of infrastructure for a public purpose (such as the dedication of land, public infrastructure, community facilities, affordable housing, or any other material public benefit) which will benefit the community and may also be a monetary contribution.

The Planning Proposal, as submitted, does not address the delivery of a public benefit. Consideration must be given to the delivery of public benefit as part of this proposal. This can be achieved through the negotiation of a Planning Agreement.

The Applicant notes the Planning Proposal will support the development of a three-level warehouse or distribution centre on the Site which will subsequently result in a significantly greater local contribution to Council.

Under the current planning controls (Scenario 1), the Site has a maximum Height of Buildings (HOB) development standard of 12m. This limits the redevelopment of the Site to a single-level warehouse or distribution centre which would leave a significant portion of the Site under-developed given the requirement for large hardstand areas for heavy vehicle manoeuvring and car parking for light vehicles. Therefore, the Site cannot currently achieve the maximum Floor Space Ratio (FSR) development standard of 1:1, with a practical design limit of approximately 0.65:1 for the Site.

The construction cost of a single-level warehouse or distribution centre is currently \$1,000-1,200/sqm of GFA which would equate to a construction cost of approximately \$28,015,000 to \$33,618,000.

Under the proposed planning controls (Scenario 2), a three-level warehouse or distribution centre can be developed under the proposed 35m HOB development standard. A three-level warehouse or distribution centre would be able to achieve the proposed maximum FSR development standard of 1.6:1 (68,960m²), while still maintaining appropriate manoeuvring and parking areas as part of the ground floor and upper level designs.

The construction cost of a three-level warehouse or distribution centre is currently estimated to be \$3,500-3,700/sqm of GFA, being approximately 300% to 350% greater than a single-level warehouse or distribution centre. It is significantly greater given additional materials and construction complexity. It would equate to a construction cost of approximately \$241,360,000 to \$255,152,000.

A summary of each scenario, and the local contribution that would be payable to Council under each scenario, is summarised in the following table. In summary, redevelopment under the proposed planning controls (Scenario 2) will result in an additional local contribution of approximately \$2.2 million (\$2,133,540 to \$2,215,340) compared to the existing planning controls (Scenario 1).

The additional local contribution that would be payable under Scenario 2 is approximately 800% (758% to 861%) greater than Scenario 1. On this basis, a significantly greater local contribution would be payable as part of a future Development Application approval that would enable Council to deliver significant public benefits in accordance with the development contribution plan. Therefore, a public benefit offer is not considered appropriate or reasonable in the circumstances.

Scenario 1: Redevelopment under Current Planning Controls

HOB Limit	12m
FSR Limit	1:1 (GFA: 43,100m ²)
Practical FSR Design Limit	0.65:1 (GFA: 28,015m ²)
Construction Costs	\$1,000-1,200/sqm of GFA (\$28,015,000 to \$33,618,000) (expressed in 2025 dollars).
1% Contributions Range	\$280,150 to \$336,180

Scenario 2: Redevelopment under Proposed Planning Controls

HOB limit	35m
FSR limit	1.6:1 (GFA: 68,960m ²)
Practical FSR Design Limit	1.6:1 (GFA: 68,960m ²)
Construction Costs	\$3,500-3,700/sqm of GFA (\$241,360,000 to \$255,152,000) Construction costs expressed in 2025 dollars.
1% Contributions Range	\$2,413,600 to \$2,551,520