Planning Proposal

94-98 Cosgrove Road, Strathfield South

Amendments to the *Strathfield Local Environmental Plan 2012* to enable a Multi-Level Warehouse or Distribution Centre

Submitted to Strathfield Council on behalf of Centuria Capital Limited



Prepared by Ethos Urban 12 February 2025 | 2230876





'Gura Bulga' Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales. Brown Country. Representing Victoria.

'Dagura Buumarri' - translates to Cold

'Dagura Buumarri'

Liz Belanjee Cameron

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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'Gadalung Djarri' Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

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Contents

Execu	tive Summary	7
1.0	Introduction	9
1.1	Project Vision	
1.2	Background	11
2.0	Site Context and Description	16
2.1	Site Location and Context	
2.2	Site Description	
2.3	Existing Development	17
2.4	Access and Transport	
2.5	Surrounding Context and Development	
3.0	Existing Planning Controls	23
3.1	Strathfield Local Environmental Plan 2012	23
3.2	Strathfield Development Control Plan 2005	
4.0	Indicative Reference Scheme	26
4.1	Overview	
4.2	Key Information	27
4.3	Layout and Built Form	27
4.4	Landscaping	
4.5	Access and Circulation	
5.0	Planning Proposal	
5.1	Objectives and Intended Outcomes	
5.2	Explanation of Provisions	
5.3	Mapping	
5.4	Site-Specific Development Control Plan	
5.5	Community Consultation	
5.6	Project Timeline	
6.0	Strategic Justification	
6.1	Strategic Justification	
6.2	Site-Specific Merit	
7.0	Environmental Assessment	51
7.1	Urban Design	51
7.2	Visual	
7.3	Transport	
7.4	Noise	60
7.5	Arboricultural	62
7.6	Contamination	62
7.7	Flooding	63
7.8	Service and Utilities	63
7.9	Social and Economic	
7.10	Evidence of Acquisition Efforts for 65 Madeline Street (Lot 18 DP 9011)	66
8.0	Conclusion	67

Figures

Figure 1	Axonometric Built Form Illustration of the Indicative Reference Scheme	10
Figure 2	Drivers for the Rise of Multi-Level Warehouses in Sydney, Australia	11
Figure 3	Sydney Multi-Level Warehouse Development Context Map	12
Figure 4	Site Location and Context Map	16
Figure 5	Site Aerial Map	17
Figure 6	Site Photographs	18
Figure 7	Road Hierarchy Map	19
Figure 8	Heavy Vehicle Approved Routes Map	19
Figure 9	Surrounding Development – North	20
Figure 10	Surrounding Development – East	21
Figure 11	Surrounding Development – South	22
Figure 12	Surrounding Development – West	22
Figure 13	Current Land Zoning Map	23
Figure 14	Current Height of Buildings Map	24
Figure 15	Current Floor Space Ratio Map	24
Figure 16	Perspective Render of the Indicative Reference Scheme – Corner of Cosgrove Rd and Hope St	26
Figure 17	Ground Level Plan – Indicative Reference Scheme	28
Figure 18	Axonometric Built Form Illustration of the Indicative Reference Scheme	28
Figure 19	Perspective Render of the Indicative Reference Scheme – Corner of Hope St and Madeline St	29
Figure 20	Indicative Reference Scheme – Materiality	29
Figure 21	Indicative Reference Scheme – Elevations	30
Figure 22	Concept Landscape Plan	31
Figure 23	Heavy Vehicle Access – Ground Level	32
Figure 24	Heavy Vehicles Access – Level 1 & 2	32
Figure 25	Height of Buildings Map – Strathfield Local Environmental Plan 2012	34
Figure 26	Floor Space Ratio Map – Strathfield Local Environmental Plan 2012	35
Figure 27	Letter Distribution Map	37
Figure 28	Productivity Structure Plan	42
Figure 29	Site Plan – Setback Illustration	51
Figure 30	Built Form and Façade Articulation	52
Figure 31	Axonometric Illustration of the Indicative Reference Scheme from the south-west	52
Figure 32	Perspective Render of the Indicative Reference Scheme – Corner of Cosgrove Rd and Hope St	53
Figure 33	Artistic Element Examples	53
Figure 34	Shadow Diagrams	54
Figure 35	Viewpoint Locations	55
Figure 36	Noise Sensitive Receivers	60

Tables

Table 1	Responses to Scoping Proposal Feedback	13
Table 2	Current Relevant Strathfield LEP 2013 Provisions	23
Table 3	Key Relevant Controls of the Strathfield DCP	25
Table 4	Key Information – Indicative Reference Scheme	27
Table 5	Anticipated Project Timeline	
Table 6	Analysis of Alternatives	
Table 7	Consistency of this Planning Proposal with the Region and District Plan	40
Table 8	Consistency of this Planning Proposal with the Strathfield LSPS	41
Table 9	Consistency with other State and Regional Studies or Strategies	43
Table 10	Consistency with State Environmental Planning Policies	44
Table 11	Assessment of Section 9.1 Directions	45
Table 12	Visual Impact Assessment – VP4 and VP9	56
Table 13	Parking Assessment	58
Table 14	Trip Generation	58
Table 15	Traffic Generation Comparison	58
Table 16	Traffic Assessment	59
Table 17	Description of Noise Sensitive Receivers	60
Table 18	Predicted Operational Noise Assessment	61
Table 19	Service Infrastructure Assessment Summary	63
Table 20	Social Impact Assessment of Operational Impacts	64

Appendices

Appendix		Author	
А.	Concept Design Report	Nettletontribe Architects	
в.	Site Survey	LandPartners	
C.	Draft LEP Maps	Ethos Urban	
D.	Draft Site-Specific DCP	Ethos Urban	
E.	Concept Landscape Plan	Geoscapes	
F.	Visual Impact Assessment	Geoscapes	
G.	Transport Assessment	Ason Group	
Н.	Noise Assessment Report	Acor Consultants	
١.	Preliminary Arboricultural Impact Assessment	Hugh the Arborist	
J.	Preliminary Site Investigation	Douglas Partners	
к.	Flooding Management Report	Acor Consultants	
L.	Service Infrastructure Assessment	LandPartners	
м.	Social and Economic Impact Assessment	HillPDA	
N.	Community Notification Letter	Ethos Urban	

Executive Summary

This Planning Proposal is submitted to Strathfield Council (Council) on behalf of Centuria Capital Limited ('Centuria' or 'the Applicant') in support of amendments to the *Strathfield Local Environmental Plan 2012* (Strathfield LEP 2012) for land identified as 94-98 Cosgrove Road, Strathfield South (the Site). The purpose of this Planning Proposal is 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 for the Site.

Centuria recognises the significant opportunity at present to redevelop the Site for the highest and best use and create a flagship multi-level warehouse that will future proof the Site for coming decades. Multi-level warehouses are necessary to service continued population growth within the Greater Sydney Region, in particularly the increased density in in-fill areas, and are a recent trend as a result of structural changes to the industrial logistics sector. However, the number of sites within in-fill areas that can support the development typology is very limited due to the fundamental requirement for large unconstrained sites that can support them.

It is therefore crucial that large and unconstrained sites facilitate the highest and best use to support Sydney's future growth. The Site represents a large single lot under single ownership where the existing development is nearing the end of its lifecycle. It is near densely populated areas, adjacent to Enfield Intermodal Logistics Centre and in proximity to Sydney's key trade gateways. As such, it represents a significant opportunity to deliver crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region.

This Planning Proposal seeks to enable the future development of a multi-level warehouse or distribution centre on the Site through the following amendments to the Strathfield LEP 2012:

- Amend the Height of Buildings Map from 12m to 35m; and
- Amend the Floor Space Ratio Map from 1:1 to 1.6:1.

It is also supported by a draft Site-Specific Development Control Plan (DCP) to provide clarity on the intended development outcome. It is noted that no physical works are proposed, with this Planning Proposal limited to the amendment of planning controls only.

This Planning Proposal is supported by an Indicative Reference Scheme which demonstrates that a suitable built form, urban design and landscape outcome can be achieved under the proposed planning controls. It comprises a three-level warehouse or distribution centre with a total gross floor area (GFA) of 68,960m² and building height of 34.6m. It also includes associated infrastructure including heavy vehicle ramps and increased landscaping coverage. A perspective render of the Indicative Reference Scheme is provided below.



Perspective Render of the Indicative Reference Scheme from the corner of Cosgrove Road and Hope Street Source: Nettletontribe Architects

This report demonstrates that this Planning Proposal is justified for the following reasons:

- It capitalises on the strategic merit of the Site, being a large single lot under single ownership within an established industrial precinct where the existing development nearing the end of its lifecycle;
- It promotes the efficient and orderly use of strategically important land by enabling the highest and best use of the Site;
- It leverages the Site's proximity to Enfield Intermodal Logistics Centre and Sydney's key trade gateways of Port Botany and Sydney Airport to maximise logistical efficiencies and significantly reduce transportation costs for businesses and delivery times to consumers;
- It responds to current demand and changing dynamics in the industrial logistics sector, contributing to the fulfilment of the shortfall in industrial logistics floor space in close proximity to trade gateways and consumers to support the growth of business in the Eastern City District;
- It will act as a catalyst for further investment in the locality, supporting the long-term potential, objectives and economic output of employment lands within the Strathfield Local Government Area and Greater Sydney Region more broadly;
- It aligns with the needs of modern tenant requirements enabling improved efficiency in storage and operations, integration of advanced technologies, flexibility and scalability, improved cost-effectiveness and sustainability;
- It manages land use conflict by being located within an established industrial precinct, managing environmental impacts to nearby sensitive land uses to support the protection of industrial land within the existing industrial precinct and prevents the fragmentation of a large single lot, to increase the capacity of employment land;
- It will reinforce and increase the competitiveness of the established Enfield/Strathfield South industrial precinct by increasing the capacity of the industrial lands surroundings the Enfield Intermodal Logistics Centre to deliver high-quality facilities and higher economic output;
- It is consistent with the strategic planning framework, contributing to the achievement of employment targets and a number of the objectives and actions outlined within State, regional and local strategic plans;
- It is consistent with the objects of the *Environmental Planning and Assessment Act* 1979, in that it promotes the orderly and economic use and development of land;
- It is consistent with the applicable State Environmental Planning Policies and Ministerial Directions;
- It is consistent with the objectives of the E4 General Industrial zone under the Strathfield LEP 2012, supporting the efficient and viable use of land for industrial uses, minimising any adverse effect of industry on other land uses, and encouraging employment opportunities;
- It demonstrates a built form outcome that manages the inherit bulk and scale of higher density industrial uses to maintain and increase amenity in the surrounding area;
- It increases the tree canopy coverage on the Site, supporting increased amenity to the surrounding area and reduce the urban heat island effects in the local area;
- It results in a negligible impact on the surrounding road network;
- It demonstrates that noise generated will comply with the noise criteria, not impacting surrounding uses;
- It supports job creation in proximity to workers and economic growth in the local area and broader Greater Sydney Region through the following key significant economic benefits:
 - During construction:
 - o 1,787 total job-years including 478 direct full-time equivalent job-years; and
 - \$676 million in total gross output, including \$230 million in direct gross output.
 - During operation:
 - 1,379 total ongoing full-time equivalent jobs including 467 direct full-time equivalent jobs; and
 - \$503 million in total economic output annually, including \$189 million in direct economic output.
- It will support significant public benefit through the creation of a significant amount of additional jobs in the local area, and contributing to the improved efficiency and capacity of the logistical supply chain, transporting goods to consumers quicker.

For these reasons, we have no hesitation in recommending that this Planning Proposal has both strategic and site-specific merit that warrants it to be progressed for Gateway Determination.

1.0 Introduction

This Planning Proposal is submitted to Strathfield Council (Council) on behalf of Centuria Capital Limited ('Centuria' or 'the Applicant') in support of amendments to the *Strathfield Local Environmental Plan 2012* (Strathfield LEP 2012) for land identified as 94-98 Cosgrove Road, Strathfield South (the Site). The purpose of this Planning Proposal is 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 for the Site.

The creation of a multi-level warehouse or distribution centre on the Site responds to structural changes to the industrial logistics sector with increased demand for business to be located in close proximity to consumers and trade gateways, supporting the growth of business. It leverages the size and strategic location of the Site to deliver crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region. It will enable business growth, providing a facility that aligns with modern tenant requirements, maximises logistical efficiencies, and reduces transportation costs and delivery times for businesses.

This Planning Proposal seeks to enable the future development of a multi-level warehouse or distribution centre on the Site through the following amendments to the Strathfield LEP 2012:

- Amend the Height of Buildings Map from 12m to 35m; and
- Amend the Floor Space Ratio Map from 1:1 to 1.6:1.

It is also supported by a draft Site-Specific Development Control Plan (DCP) to provide clarity on the intended development outcome for the Site. It is noted that no physical works are proposed, with this Planning Proposal limited to the amendment of planning controls only.

This Planning Proposal is supported by an Indicative Reference Scheme prepared by Nettletontribe Architects which demonstrates that a suitable built form, urban design and landscape outcome can be achieved under the proposed planning controls. The Indicative Reference Scheme comprises a three-level warehouse or distribution centre that includes:

- A centrally located hardstand area to facilitate loading/unloading between two (2) built form elements spanning three (3) levels with a building height of 34.6m;
- A total gross floor area (GFA) of 68,960m², including:
 - 62,360m² of warehouse or distribution centre GFA; and
 - 6,600m² of ancillary office GFA.
- Heavy vehicle ramps to facilitate access between Ground Level and Level 1-2;
- Perforated screens shielding hardstand area and north-eastern heavy vehicle ramp;
- Driveways, including two (2) heavy vehicle driveways from Cosgrove Road and five (5) light vehicle driveways along each of the street frontages;
- On-site car parking, including 353 parking spaces located adjacent to ancillary office space;
- Landscaping along each street frontage including the planting of 145 new trees, resulting in a tree canopy coverage of approximately 9.7% (including retained trees); and
- Hours of operation of 24 hours, 7 days a week.

As required by Section 3.33 of the *Environmental Planning & Assessment Act 1979* (EP&A Act), and in reference to the *making* (the LEP Guideline), this Planning Proposal includes:

- A statement of the objectives or intended outcomes of the proposed instrument (Section 5.1);
- An explanation of the provisions that are to be included in the proposed instrument (Section 5.2);
- The justification for those objectives, outcomes and provisions and the process for their implementation (including whether it will comply with relevant directions under Section 9.1 of the EP&A Act) (Section 6.0);
- Maps containing sufficient detail to indicate the effect of the proposed amendments (Section 5.3); and
- Details of community consultation (Section 5.5).

This Planning Proposal also describes the Site, the proposed amendments to the Strathfield LEP 2012 and provides an environmental assessment of the Indicative Reference Scheme. It should be read in conjunction with the Concept Design Report prepared by Nettletontribe Architects (**Appendix A**) and specialist consultant reports (refer to **Appendices**).

1.1 Project Vision

Centuria is a commercial property investment manager, managing a diverse range of investment types including industrial, office, healthcare, agriculture, and retail across Australia and New Zealand. It manages highquality Australian industrial assets across the eastern seaboard with a focus on in-fill locations and a strong tenant base that include production, packaging and distribution of consumer staples, pharmaceuticals and telecommunications businesses.

The Site has been under the ownership of Centuria (Centuria Industrial Real Estate Investment Trust (REIT), ASX:CIP) since 2013 and now comprises aging industrial assets that were constructed approximately four decades ago. As such, the existing structures are nearing the end of their lifecycle and do not align with the strategic location and characteristics of the Site. It also does not align with the changing dynamics of the industrial logistics sector including the continued growth of e-commerce and demand for floor space in in-fill areas in close proximity to consumers and trade gateways.

Centuria recognises the opportunity at present to redevelop the Site for the highest and best use to create a flagship multi-level warehouse or distribution centre that will future proof the Site for the coming decades. Multi-level warehouses are necessary to service continued population growth within the Greater Sydney Region, in particular the increased density in in-fill areas, and are a recent trend as a result of structural changes to the industrial logistics sector. However, the number of sites within in-fill areas that can support the development type is very limited due to the fundamental requirement for large unconstrained sites to support the development typology.

It is therefore crucial that large and unconstrained sites facilitate the highest and best use to support Sydney's future growth. The Site represents a large single lot under single ownership where the existing structures are nearing the end of their lifecycle. It is also in close proximity to densely populated areas, adjacent to Enfield Intermodal Logistics Centre and in proximity to Sydney's key trade gateways. As such, it represents a significant opportunity to deliver crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region.

Centuria are seeking to align the redevelopment of the Site with the strategic and site-specific value of the Site to create a facility that aligns with modern tenant requirements, maximises logistical efficiencies, and reduces transportation costs and delivery times for businesses.

The project is informed by substantial analysis, culminating in the preparation of this Planning Proposal to enable the future development of multi-level warehouse or distribution centre that will ensure the Site is future proofed for the coming decades. It is supported by an Indicative Reference Scheme that demonstrates a built form and urban design outcomes that will both meet modern tenant requirements and respond to environmental constraints, ensuring amenity is provided on the Site for workers and visitors, as well as surrounding uses and public open space. It represents Centuria's vision for the Site with an illustration of the Indicative Reference Scheme provided in **Figure 1** below.





1.2 Background

1.2.1 The Rise of Multi-Level Warehouses in Sydney, Australia

Multi-level warehouses have typically been a feature of land-constrained markets such as Hong Kong and Tokyo, to facilitate the necessary industrial floor space in urban in-fill areas to service dense populations. However, they have recently become prevalent in Sydney, Australia.

Currently, at least twenty-three (23) multi-level warehouse projects are in the planning system or under construction within the Greater Sydney Region. This is estimated to equate to over 1.4 million sqm of GFA, with a focus on the most land constrained and valuable industrial precincts located in close proximity to dense populations and Sydney's key trade gateways of Port Botany and Sydney Airport (refer to **Figure 3**).

The key drivers for the rise of multi-level warehouses are summarised in **Figure 2** and discussed below.



Figure 2 Drivers for the Rise of Multi-Level Warehouses in Sydney, Australia

Source: Ethos Urban

The primary driver for the rise of multi-level warehouses in Sydney is land constraints, paired with the rise of ecommerce which experienced significant growth during the Covid-19 pandemic. This has resulted in historically low vacancy rates across Australia with Sydney's industrial vacancy rate dropping as low as 0.2% in H1 of 2023 and most recently sitting at 2% (H1 2024) having been 6.3% in H2 2019¹.

Given the rise of e-commerce, there is growing demand from businesses for high-quality, well-located industrial logistics facilities with proximity to consumers. This is a significant trend that is supporting the continued demand and ultimate need to construct multi-level warehouses to support the growth of businesses and broader growth of the Greater Sydney Region.

The e-commerce sector is becoming increasingly competitive with more businesses seeking to meet the growing expectation for same-day delivery by their customers. As such, competitive e-commerce businesses need to be located in close proximity to consumers, increasing the demand for industrial logistics floor space within in-fill areas close to transport connections.

Historically low vacancy rates have resulted in increased rents in Sydney which increased by 21.5% in 2023 and 23.5% in 2022 alone, with growth expected to slow but remaining relatively high². The increase in rents, as well as land value, has supported the development of multi-level warehouses and their associated high costs of construction. Due to the significant rise in rents, tenants are conversely seeking to locate in close proximity to the key trade gateways and consumers to reduce transport costs, further exacerbating the demand.

The current and future context of multi-level warehouses within the Greater Sydney Region is illustrated in **Figure 3** on the following page.

¹ CBRE: Australia's Industrial and Logistics Vacancy – First Half of 2024 (1H24) – https://mktgdocs.cbre.com/2299/2fcd98db-2d27-4579-84ed-fa4db3a37fd1-699864627/v032024/australia-industrial-logistics-vacancy-report-h1-2024.pdf

² CBRE: Figures Sydney Industrial and Logistics 2Q24 – https://mktgdocs.cbre.com/2299/c46c69b2-6aa8-4e2a-8d61-72afc0c0a406-

^{71816/}v032024/figures-sydney-industrial-and-logistics-2q24.pdf





Source: Nearmap, Ethos Urban

1.2.2 Pre-Lodgement Consultation

Table 1

Responses to Scoping Proposal Feedback

In accordance with the LEP Guideline, a Scoping Proposal was submitted to Council with a formal scoping meeting held on 23 April 2024. Subsequently, Council provided written feedback on the Scoping Proposal on 30 April 2024. The Applicant's response to matters raised in Council's feedback is provided in **Table 1** below.

Comment **Applicant Response** Strathfield Council Scope of the Proposal, Strategic and Site-Specific Merit A Concept Design Report (**Appendix A**) and • Council is supportive of an increase in the HOB and FSR limits at the Visual Impact Assessment (**Appendix F**) has site, and based on a high level review of the applicable strategic planning framework, there is evidence of an increase in scale and been prepared. intensity at the site as having strategic merit. They demonstrate that the Indicative Reference • Notwithstanding, based on the information submitted with the Scheme achieves a suitable built form, urban scoping proposal, Council is unable to comment on whether the HOB design and landscape outcome that maintains and FSR limits proposed would be supported. Conversely, Council is adequate amenity to surrounding uses. not of the mind, based on the information submitted, that the scale of the Planning Proposal should be reduced. • Council's position on the appropriate height and FSR will largely be informed by a Visual Impact Assessment and Urban Design Study lodged with the Planning Proposal. Council recommends this work is undertaken by experts experienced in preparing such documents in similar development contexts. • Council notes that the Scoping Proposal identifies a number of multi-Noted. A comprehensive description of the level warehouses developed or under construction across multi-level warehouse context within Sydney is provided in Section 1.2.1 to give Council an metropolitan Sydney. Council acknowledges and is supportive of the demand for this warehousing typology and appreciates the strategic understanding of the relevant context to this value of the site considering its proximity to the Enfield Intermodal. Planning Proposal. Notwithstanding, the Planning Proposal cannot rely on examples at Currently, there are at least 23 multi-level sites that are not comparable in terms of the surrounding built form. warehouse projects within the Greater Sydney The examples provided are either set within an area of significant Region with eight (8) receiving development open space or as a back drop to significant medium to high rise consent at the time of writing. development. This point reinforces the need for urban design and They cover a variety of development contexts visual impact assessments that demonstrate there is site specific that demonstrate the ability to manage merit for the increase in scale. environmental impacts from industrial areas to surrounding uses. Specifically, the Moxon Road, Punchbowl (SSD-55266460) and Momenta (SSD-48411467) multi-level developments demonstrate how high-density industrial development can appropriately manage the interface to surrounding sensitive receivers. This Planning Proposal is supported by an Key to Council's position will be a demonstration of how a high quality Indicative Reference Scheme that demonstrates outcome can be achieved to soften the built form. A draft site specific DCP is recommended to capture any key design features of the a suitable built form, urban design and submitted Urban Design Study including but not limited to setbacks, landscape outcome can be achieved on the Site. sustainability initiatives, landscaping provisions, façade treatments Refer to the Concept Design Report (**Appendix** and office space orientation, and general design statements or **A**). principles. It is also supported by a Draft Site-Specific DCP This DCP may become null and void considering the likely cost of (Appendix D) that establishes provisions to help works and SSD assessment considerations. However, this is a give Council comfort that a suitable outcome hypothetical that does not remove the value of having a DCP to will be achieved on the Site in the future. support a significant increase in scale and also confirms the intended development outcomes. **Recommended Investigations and Studies** This Planning Proposal is accompanied by The list of technical studies to support the Planning Proposal included in the Scoping Proposal is generally agreed with. Some minor technical studies, including the additional studies recommended by Council (refer to changes are included.

Appendices).

Comment	Applicant Response
The Visual Impact Assessment should include, but not be limited to views from the following areas: • View due south from intersection of Cosgrove Road and Cleveland	A Visual Impact Assessment has been prepared by Geoscapes and included at Appendix F . It adopts the viewpoints selected by Council, as
Street; View due north from intersection of Cosgrove Road and Blanche	well as additional viewpoints selected by the Applicant.
Street; • View due north in front of amenity building of Begnell Field;	
 View due north in front of amenity building of Begnell Field; View due north from Madeline Street near No.122 5. View due 	
northwest in front of amenity building adjacent to Cookes Skate Park;	
• View due west from Excelsior Avenue near No.11;	
 View due south from intersection of Bede Street and Anselm Street; and 	
 View due east from intersection of Mainline Road and Wentworth Street. 	
Please also review and consider whether there are any elevated regional or district views across the industrial area which are noteworthy and should be considered as part of the visual assessment.	
Fransport for NSW	
Provide a transport and accessibility impact assessment, which includes, but is not limited to the following:	A Transport Assessment has been prepared by Ason Group and included at Appendix G . It
• An assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity.	includes an assessment of the subject matters, identifying that the Planning Proposal will resu in a negligible impact on the surrounding road network.
 Details of all traffic types and volumes likely to be generated during construction and operation, including a description of haul routes and vehicle types. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation. 	Refer to Section 5 and 6 of the Transport Assessment (Appendix G) for details on the operational traffic types and volumes. Details and an assessment of construction traffic will
 Plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading, or servicing can be accommodated on the site to avoid queuing in the street network. 	support any future Development Application.
• Detailed plans of the site access and proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards and Council's DCP.	Refer to Section 4.5 and Section 6 of the Transport Assessment (Appendix G).
 Swept path diagrams depicting vehicles entering, exiting, and manoeuvring throughout the site. 	Refer to Appendix A of the Transport Assessme (Appendix G).
 Details of road upgrades, infrastructure works, or new roads or access points required for the development. 	This Planning Proposal, based on the Indicative Reference Scheme, will result in a negligible impact on the surrounding road network and does not require external road upgrades. Refer to the Transport Assessment (Appendix G).
 Details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site. 	Details of traffic demand management, including a Green Travel Plan, will be appropriately provided as part of a future Development Application to promote none- private motorised vehicles.
 Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, 	The Site is adequately serviced by existing pub transport connections. Refer to Section 3 of the

• Measures to integrate the development with the existing/future public transport network.

Comment	Applicant Response
Sydney Water	
• In order to fully support all growth and developments and to fully assess proposed developments, we require an anticipated ultimate and annual growth dwelling or job numbers for this development. The growth data should be completed and provided directly to Sydney Water via the Water Servicing Coordinator and via the Feasibility application process.	A feasibility application (CN216635) has been lodged with Sydney Water. Discussion with Sydney Water noted that due to the large volume of projects various stakeholders in Sydney Water had not yet been able to review a feasibility application. Refer to the Service Infrastructure Assessment (Appendix L).
 Critical assets, in the form of a DN2400 SCL IBL potable water trunk main, traverses the rear of the subject site. While Sydney Water understands no works will be undertaken until the development application stage, Sydney Water highlights that redevelopment of the site may be constrained by asset protection and/or adjustment or deviation of a critical asset. 	Given the existence of existing buildings on the Site, it would appear the asset is deep and has not prevented development of the Site. However, with any new development Sydney Water will need to be consulted for Building Plan Approval assessment depending on depth of the tunnel. Refer to the Service Infrastructure Assessment (Appendix L).
• In preparation of future development applications for the site, a Specialist Engineering Assessment will be required as part of the proponents' Sydney Water Out of Scope Building Plan Approval application to assess the impact of the ultimate state of development on assets.	Noted. These matters will be addressed as part of any future Development Application.
 The Out of Scope BPA should be lodged via a Water Servicing Coordinator as soon as a design has been identified and before any development applications are referred to Sydney Water as part of the concurrence and referral process. 	
 The proponent to lodge a Feasibility via their WSC once they decide to progress to the Planning Proposal stage. The proponent should complete and return the growth data form in the format provided as part of their Planning Proposal submission and with their Feasibility application. The proponent should follow the requirements for the Out of Scope Building Plan approval prior to lodgement of any future development applications. 	As above, a feasibility application (CN216635) has been lodged with Sydney Water. Refer to the Service Infrastructure Assessment (Appendix L).

2.0 Site Context and Description

2.1 Site Location and Context

The Site is located within the Strathfield Council Local Government Area (LGA) and is approximately 12km southwest of the Sydney Central Business District (CBD) and some 11km south-east of the Parramatta CBD. It is located within an established industrial precinct within Strathfield South/Enfield, supported by the Enfield Intermodal Logistics Centre which is owned and managed by NSW Ports.

Enfield Intermodal Logistics Centre connects to Port Botany, Sydney Airport and Regional NSW through dedicated freight-only rail lines. It represents a 60 hectare area to the immediate west of the Site inclusive of an intermodal terminal, container storage and industrial lots for logistics freight forwarding, packing and unpacking and transport and warehousing. The *NSW Ports 2063* masterplan identifies that the limited supply of industrial lands within NSW and Sydney will power the need for multi-level warehouse developments and intensification of uses within these lands.

The established industrial precinct is bounded by the Hume Highway to the north, Roberts Road to the west, and residential areas to the east and south on the opposing side of the Cooks River corridor and sport and recreation fields (Cooke Park and Begnell Field) to the south. The residential area to the south-east is generally described as predominantly single detached dwellings with mature tree canopy in the surrounding streets. It also includes a small heritage conservation area identified as 'CI – Birriwa Avenue Conservation Area - Inter-war California bungalow style group' approximately 300m south-east of the Site.



The Site's location and surrounding context is illustrated in Figure 4 below.

Figure 4 Site Location and Context Map

Source: Ethos Urban

2.2 Site Description

The Site comprises a singular lot, legally described as Lot 100 DP 862635, identified as 94-98 Cosgrove Road, Strathfield South. It has a total site area of 43,100m², with the following approximate frontages:

- 200m frontage to Cosgrove Road to the west;
- 185m frontage to Madeline Street to the east;

- 165m frontage to Hope Street to the south;
- 55m frontage to 65 Madeline Street (Lot 18 DP 9011); and
- 235m frontage to multiple small lots along the Site's northern boundary.

An aerial of the Site and its immediate surroundings is provided at Figure 5 below.



Figure 5Site Aerial MapSource: Nearmap, Ethos Urban

2.3 Existing Development

The existing development on the Site is currently utilised by a freight and logistics company and a retail shopfitting manufacturer as illustrated in **Figure 6** on the following page, and is described as being portioned into three (3) parts as follows:

- The north-west portion of the Site comprises an industrial building containing a retail shop-fitting manufacturer with three (3) vehicle crossovers to Cosgrove Road and an access road around the perimeter of the building.
- The southern portion of the Site comprises an elongated warehouse that spans the entire southern portion of the Site fronting Hope Street. It includes ancillary office space, with hardstand area and car parking along the street frontage. It also includes separate vehicular crossovers to Cosgrove Road, Hope Street and Madeline Street with shared arrangements between light and heavy vehicles.
- The north-eastern portion of the Site comprises container storage with two (2) vehicular crossovers to Madeline Street as well as an accessway connecting the southern portion of the Site. It includes a defined landscape setback and retaining wall to Madeline Street.

A Site Survey prepared by Land Partners and included at **Appendix B**. It identifies the Site is relatively flat with an approximate 5.5m fall from the north-west to the south-west portion of the Site. The change in elevation across the Site is described as gradual given the size of the Site.

The Site contains two (2) existing substations along the eastern and western boundaries with right of way easements to protect access to the substations. It is also identified as containing right of way easements in the south-east portion adjacent to 65 Madeline Street (Lot 18 DP 9011).



View of the north-west portion of the Site from Cosgrove Road looking east



View of the south-west portion of the Site from the corner of Cosgrove Road and Hope Street looking north



View of the south-east portion of the Site along Madeline Street looking south

Figure 6 Site Photographs

Source: Ethos Urban

2.4 Access and Transport

The Site's currently comprises a total of eight (8) vehicular crossovers with four (4) along Cosgrove Road, two (2) along Hope Street, and two (2) along Madeline Street. The existing road network surrounding the Site is inclusive of a mix of state, regional and local roads. As illustrated in **Figure 7**, Hope Street and Madeline Street are local industrial roads, with Cosgrove Road representing a collector road providing connectivity to surrounding arterial roads, being Liverpool Road (Hume Highway) to the north and Punchbowl Road to the south.

The National Heavy Vehicle Regulator (NHVR) currently identifies Liverpool Road (Hume Highway) and Punchbowl Road as 25/26m B-Double truck routes without any travel conditions, and Cosgrove Road 25/26m B-Double truck routes with relevant travel conditions, as outlined in **Figure 8**. As such, heavy vehicles accessing the Site can use any of the approved routes.

A survey of existing traffic identified an AM peak of 7.30-8.30AM and PM peak of 5.00-6:00PM during weekdays.



View of the south-west portion of the Site from Cosgrove Road looking south-east



View of the primary entrance along the southern portion of the Site fronting Hope Street looking north



View of the north-east portion of the Site along Madeline Street looking south-west



Figure 7 Road Hierarchy Map

Source: Ason Group





Source: Ason Group

The Site is supported by strong industrial transport connections to Sydney's key trade gateways and consumers. To the immediate west of the Site is the Enfield Intermodal Logistics Centre that directly connects to Port Botany, Sydney Airport, and Regional NSW via a dedicated freight rail line. The Site is also afforded strong access to key road corridors, such as the Hume Highway (Liverpool Road) (A22) and Roberts Road (A3), including a range of large road infrastructure projects within the region that support greater transport connections for heavy vehicles.

In regard to public transport, the Site is located 900m north (12-minute walk) from a bus stop currently serviced by the 450 Hurstville to Strathfield Station bus line. Further, bus stops between 1.2km and 1.7km from the Site are serviced by the 415 Chiswick to Campsie (via Strathfield Station) bus line, and 914 Greenacre to Strathfield Station bus line. These routes connect to Strathfield Station, allowing connectivity to the Sydney trains network.

There is limited pedestrian infrastructure within proximity to the Site with footpaths provided along the southern side of Hope Street and both sides of Madeline Street. There are currently limited cycling routes provided within the vicinity of the Site, with the closest being along the Cooks River corridor to the north-west of the Site.

2.5 Surrounding Context and Development

The Site is located within an established industrial precinct with the immediate surrounding context comprising industrial uses, including the Enfield Intermodal Logistics Centre to the immediate west of the Site. The broader surrounding context comprises the continuation of industrial uses to the north, west and south, the Cooks River corridor to the north-east and residential uses to the north, east and south-east.

2.5.1 North

To the immediate north of the Site are a diverse range of small industrial uses that directly adjoin the Site along Cosgrove Road and Madeline Street, as well as along Pilcher Street which back onto the Site. Further north, the industrial area continues with a range of industrial uses at different scales, with the Cooks River Corridor separating the industrial area to low-density residential development.

The immediate surrounding context to the north of the Site is illustrated in Figure 9 below.







View of the existing small goods industrial building to the north of the Site along Madeline Street



View of the existing small industrial uses along Pilcher Street View of the existing small industrial uses along Pilcher Street to the north of the Site

Figure 9 Surrounding Development – North Source: Ethos Urban



to the north of the Site

2.5.2 East

To the immediate east of the Site along Madeline Street is a large recycling facility as well as a selection of smaller industrial uses. Further east is Cooke Park, an open green space for public recreational use approximately 125m south-east of the Site. It includes a full-length basketball court, playground, and sports field, as well a variety of vegetation. The Cooks River Corridor is also positioned to the east of the Site and, together with Cooke Park, provides a buffer to residential uses further east.

The surrounding context to the immediate east of the Site, from north to south, is illustrated in **Figure 10** below.



View of the entrance to an existing recycling facility along Madeline Street



View of an existing industrial building along Madeline Street



View of the exit from an existing recycling facility along Madeline Street



View of an existing hardstand area and industrial building looking north along Madeline Street

Figure 10 Surrounding Development – East

Source: Ethos Urban

2.5.3 South

To the immediate south of the Site are a series of small and medium sized industrial uses fronting Hope Street and Madeline Street. Madeline Street connects to the residential area further south with a vehicle barrier in place to restrict heavy vehicle movement into the residential area. Further south is Begnell Field, a recreational sports field located 150m south of the Site, which is surrounded by low density residential development to the east and south.

The surrounding context to the south of the Site is illustrated in **Figure 11** below.



View of the heavy vehicle restrictor on Madeline Street looking south-east



View of an existing industrial building and entrance (100-102 Cosgrove Road) along Hope Street looking south

Figure 11 Surrounding Development – South

Source: Ethos Urban

2.5.4 West

To the immediate west of the Site along Cosgrove Road is land that forms part of the Enfield Intermodal Logistics Centre. It includes vacant land that fronts Cosgrove Road which may be developed on in the future, as well as a two-storey food manufacturing building. Further west is the intermodal facility and freight rail lines associated with the Enfield Intermodal Logistics Centre.

The surrounding context to the west of the Site is illustrated in Figure 12 below.



View of existing vacant land that forms part of the Enfield Intermodal Logistics Centre from Cosgrove Road looking south-west

Figure 12 Surrounding Development – West

Source: Ethos Urban



View of 65 Madeline Street on the corner of Madeline Street and Hope Street looking north-west



View of an existing industrial building at (2 Hope Street) along on Hope Street looking south

View of Northside Fine Foods Facility and entrance to the Enfield Intermodal Logistics Centre from Cosgrove Road looking north-west

3.0 Existing Planning Controls

3.1 Strathfield Local Environmental Plan 2012

The Strathfield LEP 2012 is the principal environmental planning instrument applying to the Site. The key controls currently relating to the Site and Planning Proposal are identified in **Table 2** below.

Table 2 Current Relevant Strathfield LEP 2013 Provisions



1 Objectives of zone

- To provide a range of industrial, warehouse, logistics and related land uses.
- To ensure the efficient and viable use of land for industrial uses.
- To minimise any adverse effect of industry on other land uses.
- To encourage employment opportunities.
- To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers.
- To minimise fragmentation of valuable industrial land and provide large sites for integrated and large floorplate activities.
- To allow for a higher proportion of ancillary office floor space to support high technology, light industrial and small-scale warehouse-related land uses.
- 2 Permitted without consent
- Nil

2.3 - Zone Objectives and

Land Use Table

3 Permitted with consent

Agricultural produce industries; Animal boarding or training establishments; Boat building and repair facilities; Car parks; Depots; Environmental protection works; Freight transport facilities; Garden centres; General industries; Goods repair and reuse premises; Hardware and building supplies; Industrial retail outlets; Industrial training facilities; Kiosks; Landscaping material supplies; Light industries; Local distribution premises; Neighbourhood shops; Oyster aquaculture; Places of public worship; Plant nurseries; Recreation areas; Research stations; Roads; Sex services premises; Signage; Storage premises; Take away food and drink premises; Tank-based aquaculture; Timber yards; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Veterinary hospitals; Warehouse or distribution centres; Wholesale supplies

4 Prohibited

Any development not specified in item 2 or 3



3.2 Strathfield Development Control Plan 2005

The *Strathfield Development Control Plan 2005* (Strathfield DCP) provides additional detailed design guidance which builds upon the provisions of the Strathfield LEP 2012. Part D – Industrial Development establishes the key design controls for the Site given its industrial zoning, setting out the controls for density, bulk and scale, setbacks, parking access and manoeuvring, landscaping, and signage.

More generally, the Strathfield DCP establishes a number of controls that are relevant to the Site, with the key controls impacting the built form, as summarised in **Table 3** below.

Provision	Relevant Control
Section 1.2 – Objectives	
Specific Objectives	 To improve the quality of industrial development within the Strathfield Municipality; To ensure the orderly development of industrial sites to minimise their environmental impact while maximising their functional potential;
	 To ensure development is consistent with the principles of Ecologically Sustainable Development;
	 To encourage high quality building design and industrial streetscape aesthetics; To ensure that new industrial development is of a type, scale, height, bulk and character that is compatible with the streetscape characteristics of the surrounding area;
	 To promote high quality landscape areas which complement the overall development of the site and which assist in enhancing streetscape quality;
	• To ensure that development will not unreasonably impact upon the amenity of any residential area in the vicinity;
	 To ensure that traffic generated by industrial development does not adversely impact upon local or regional traffic movements;
	• To ensure that each development has adequate on-site parking and manoeuvring areas for vehicles; and
	To encourage employee amenity within industrial developments.
Section 2.5 – Density, Bulk	and Scale
Height	 A building shall not have a wall height of more than 10m above natural ground level. Where an industrial development otherwise achieves the objectives of Part D, Council may consider varying this provision depending on the merits of the case.
Floor Space Ratio	The maximum floor space ratio is 1:1.
Section 2.6 – Setbacks	
Front Setbacks	• A minimum setback of 10m from the front boundary applies.
Secondary Setbacks	• On corner lots, a setback of 5m applies to the secondary frontage.
Side Setbacks	 Side and rear boundary setbacks for proposals adjoining non-industrial uses such as residential development shall be subject to an individual merit based assessment. Such a assessment will consider privacy, solar access, and visual and acoustic amenity. Side and rear boundaries adjoining industrial development may not require a setback; th will depend on the individual situation
Section 2.9 – Parking	
Car Parking	 Industry: 1 space per 50m² GFA where any office component is under 20%. If the office component is greater than 20% that additional area will be assessed at a rate of 1 space per 40m² GFA. Warehouses: 1 space per 300m² GFA.
	 Delivery and service vehicles associated with a development: 1 space per 800m² GFA up t 8,000m² GFA plus 1 space per 1,000m² GFA thereafter.
Layout	 Car parking areas should ideally be located in the front setback for easy access. Loading/unloading and parking areas are to be separated so as not to cause conflict.
Section 2.10 – Landscaping	and Fencing
Landscape Setbacks	• For sites greater than 10,000m ² , the minimum width is to be 4m.
Landscape Area	 Continuous deep soil landscape areas of a minimum of 3m in width are required adjacen to all common boundaries forward of the building line for sites greater than 10,000m².

Table 3 Key Relevant Controls of the Strathfield DCP

4.0 Indicative Reference Scheme

This section describes the Indicative Reference Scheme which depicts the vision for the Site, being a flagship three-level warehouse or distribution centre. It has been developed to identify a potential future functional development that demonstrates a suitable environmental outcome within the proposed planning controls. The Indicative Reference Scheme is depicted in detail within the Concept Design Report prepared by Nettletontribe Architects included at **Appendix A**. A summary of the key components is provided in the following sections.

4.1 Overview

The Indicative Reference Scheme would involve site preparation works including the demolition of the existing structures and earthworks across the Site to enable construction of a new facility. The Indicative Reference Scheme comprises a three-level warehouse or distribution centre that includes:

- A centrally located hardstand area to facilitate loading/unloading between two (2) built form elements spanning three (3) levels with a building height of 34.6m;
- A total gross floor area (GFA) of 68,960m², including:
 - 62,360m² of warehouse or distribution centre GFA; and
 - 6,600m² of ancillary office GFA.
- Heavy vehicle ramps to facilitate access between Ground Level and Level 1-2;
- Perforated screens shielding hardstand area and north-eastern heavy vehicle ramp;
- Driveways, including two (2) heavy vehicle driveways from Cosgrove Road and five (5) light vehicle driveways along each of the street frontages;
- On-site car parking, including 353 parking spaces located adjacent to ancillary office space;
- Landscaping along each street frontage including the planting 145 trees, resulting in a tree canopy coverage of approximately 9.7% (including retained trees); and
- Hours of operation of 24 hours, 7 days a week.

It is important to note that no physical works are proposed, with the Indicative Reference Scheme representing a possible development outcome. It is a single possible solution for how the Site might be redeveloped under the proposed planning controls, with development still required to be subject to a future Development Application.

A perspective render of the Indicative Reference Scheme is provided in Figure 16 below.



 Figure 16
 Perspective Render of the Indicative Reference Scheme - Corner of Cosgrove Rd and Hope St

 Source: Nettletontribe Architects

4.2 Key Information

A summary of the key information in regard to the Indicative Reference Scheme is provided in **Table 4** below.

Table 4 Key Information – Indicative Reference Schem
--

Component	Description				
Site Area	43,100m ²				
Land Uses	Warehouse or distribution centre, including ancillary Office premises uses				
Gross Floor Area	Component	Warehouse GFA	Office GFA	Total	
	Warehouse 1	7,780m ²	1,100m ²	8,880m ²	
	Warehouse 2	12,150m ²	1,100m ²	13,250m ²	
	Warehouse 3	7,780m ²	1,100m ²	8,880m ²	
	Warehouse 4	13,640m ²	1,100m ²	14,740m ²	
	Warehouse 5	7,780m ²	1,100m ²	8,880m ²	
	Warehouse 6	13,230m ²	1,100m ²	14,330m ²	
	Total	62,360m ²	6,600m ²	68,960m ²	
FSR	1.6:1				
Building Height	34.6m (RL 51.6)				
Car Parking	353 spaces				
Tree Retention and Planting	 Retain – 48 Plant – 145 Total – 193 				
Tree Canopy Coverage	4,171m² (9.7%)				
Operation Hours	24 hours a day, 7 d	lays a week			
Construction Jobs	478 direct full-time	e equivalent job-years			
Operational Jobs	467 direct full-time	e equivalent jobs			

4.3 Layout and Built Form

The Indicative Reference Scheme comprises a three-level warehouse or distribution centre with a centrally positioned shared hardstand area and warehouse tenancies to the north and south. It results in an efficient layout with a centralised hardstand area servicing loading docks on each side, while positioning hardstand area away from the external envelope minimising visual and noise impacts to surrounding receivers.

In order to facilitate heavy vehicle access to Level 1 and 2, separate circular ramps are provided to ensure the safe and efficient movement of heavy vehicles. The ramps are positioned in the northern portion of the Site to minimise visibility to surrounding residential areas to the south-east.

The location of ancillary office space has been positioned at the corners of the warehouse spaces to reduce the bulk and scale of the built form through articulation of facades and material selection, while also enabling the creation of smaller tenancies in the future. It is identified as containing six (6) warehouse tenancies that may be split in the future. The layout of car parking across the Site, has been positioned in order to ensure an adequate provision adjacent to each separate ancillary office core.

The layout of the Indicative Reference Scheme is illustrated on the Ground Level plan and axonometric built form illustration provided in **Figure 17** and **Figure 18** on the following page.



 Figure 17
 Ground Level Plan – Indicative Reference Scheme

 Source: Nettletontribe Architects



Figure 18 Axonometric Built Form Illustration of the Indicative Reference Scheme

Source: Nettletontribe Architects

The built form of the Indicative Reference Scheme has drawn inspiration from a historical Enfield Tram, adopting horizontal facade pattern breaks and vertical rhythm and expressed windows inspired by the design of the Enfield Tram. The horizontal facade pattern breaks have been incorporated into the warehouse façade through

the use of large glazing elements, while the vertical rhythm and expressed windows have been incorporated into the office elements to create

As depicted in **Figure 20** and **Figure 22**, the Indicative Reference Scheme comprises a selection of elements to contribute to a high quality built form and façade. It includes offices comprising expressed windows, glazing and metal cladding, as well as horizontal façade pattern glazing breaks in the warehouse façade and perforated mesh screening at either end of the hardstand and the north-eastern ramp. The materiality of the warehouse includes 'jasper' and 'shale grey' coloured profiled metal sheeting with blue glazing, while the office materiality comprises predominantly clear glass.

A perspective render of the Indicative Reference Scheme from the corner of Hope Street and Madeline Street depicting the built form is provided in **Figure 19** below.



 Figure 19
 Perspective Render of the Indicative Reference Scheme – Corner of Hope St and Madeline St

 Source: Nettletontribe Architects



 Figure 20
 Indicative Reference Scheme – Materiality

 Source: Nettletontribe Architects

0		R. 515 +-1m (0)	
12 MZZ 5. 4 0 00 IVAL 00 IV			
11 M-22 R. 7 Holo LAVE 01 R. 7 Holo R. 7 Holo			
01 1677 Ric 2000 Ric 10 000 Ric 11 000 Ric 2000 Ric 2000 Ri			

North Elevation



East Elevation - Madeline Street frontage



South Elevation – Hope Street frontage



West Elevation - Cosgrove Road frontage

Figure 21 Indicative Reference Scheme – Elevations

Source: Nettletontribe Architects

4.4 Landscaping

The Indicative Reference Scheme is supported by a Concept Landscape Plan prepared by Geoscapes and included at **Appendix E**. It comprises a 10m wide vegetation buffer zone along the frontage to Cosgrove Road, comprising retained existing trees and proposed tree plantings, as well as larger species such as Eucalyptus globoidea and Eucalyptus paniculata.

The indicative landscape design has sought to maximise the use of larger canopy trees to create a visual buffer that responds to the built form and scale of the development, while ensuring selected species have adequate space to survive and mature healthily. It includes a total tree canopy coverage of 4,171m² (9.7%), representing a significant increase in comparison to the existing condition on the Site, achieved through the retention of 48 trees and planting of 145 new trees, resulting in 193 trees on the Site.

The concept landscape masterplan supporting the Indicative Reference Scheme is provided in **Figure 22** below.



Figure 22 Concept Landscape Plan Source: Geoscapes

4.5 Access and Circulation

The Indicative Reference Scheme comprises a total of seven (7) vehicle crossovers along each of the Site's street frontages with separate light and heavy vehicle driveways to avoid conflict. As aforementioned, a suitable provision of car parking has been positioned adjacent to the respective ancillary office spaces on each corner of the Site to provide efficient and safe access for workers and visitors. The ancillary office space represents the key access point for all workers and visitors. It is noted that pedestrian access to the Site will be further resolved as part of a future Development Application.

In regard to heavy vehicle access, all heavy vehicles enter in the north-west corner of the Site. The Ground Level has been designed to accommodate up to a 26.0m B-Double, while Level 1 and 2 have been designed to accommodate up to a 20.0m Articulated Vehicle. All vehicles can enter and exit the Site in a forward direction.

The heavy vehicle access and circulation of the Indicative Reference Scheme is illustrated in **Figure 23** and **Figure 24** on the following page. It illustrates that heavy vehicles entering the Ground Level circulate and exit via the dedicated heavy vehicle exit positioned centrally along Cosgrove Road. Heavy vehicles that access Level 1 and 2 do so via separate spiral up and down ramps that are designed for up to a 20.0m Articulated Vehicle. These vehicles exit via the driveway in the north-west corner of the Site.



 Figure 23
 Heavy Vehicle Access – Ground Level

 Source: Ason Group
 Source: Ason Group



Figure 24Heavy Vehicles Access – Level 1 & 2Source: Ason Group

5.0 Planning Proposal

This section discusses the key components of this Planning Proposal including the objectives and intended outcomes, explanation of provisions, mapping and other matters required by Section 3.33 EP&A Act.

This Planning Proposal seeks to amend the height of building and floor space ratio development standards for the Site under the Strathfield LEP 2012 to enable the future development of a multi-level warehouse or distribution centre. It seeks to capitalise on the strategic and site-specific merit of the Site to deliver crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region.

Specifically, this Planning Proposal seeks to enable the future development of a multi-level warehouse or distribution centre on the Site through the following amendments to the Strathfield LEP 2012:

- Amend the Height of Buildings Map from 12m to 35m; and
- Amend the Floor Space Ratio Map from 1:1 to 1.6:1.

It is also supported by a draft Site-Specific DCP to provide clarity on the intended development outcome for the Site. The key components of this Planning Proposal are discussed in the following sections.

5.1 Objectives and Intended Outcomes

The primary objective of this Planning Proposal is to amend the height of building and floor space ratio development standards for the Site under the Strathfield LEP 2012. The intent of this Planning Proposal is to enable the future development of a multi-level warehouse or distribution centre to align with the highest and best use of the Site.

This Planning Proposal seeks to capitalise on a significant opportunity to create a flagship multi-level warehouse that will future proof the Site for coming decades, with the key objectives and intended outcomes summarised as follows:

- Capitalise on the strategic merit of the Site, being a large single lot under single ownership within an established industrial precinct where the existing development nearing the end of its lifecycle;
- Promote the efficient and orderly use of strategically important land by enabling the highest and best use of the Site;
- Leverage the Site's proximity to Enfield Intermodal Logistics Centre and Sydney's key trade gateways of Port Botany and Sydney Airport to maximise logistical efficiencies and significantly reduce transportation costs for businesses and delivery times to consumers;
- Respond to current demand and changing dynamics in the industrial logistics sector, contributing to the fulfilment of the shortfall in industrial floor space in close proximity to trade gateways and consumers to support the growth of business in the Eastern City District;
- Act as a catalyst for further investment in the locality, supporting the long-term potential, objectives and economic output of employment lands within the Strathfield Local Government Area and Greater Sydney Region more broadly;
- Align with the needs of modern tenant requirements enabling improved efficiency in storage and operations, integration of advanced technologies, flexibility and scalability, improved cost-effectiveness and sustainability;
- Manage land use conflict by being located within an established industrial precinct, managing environmental impacts to nearby sensitive land uses to support the protection of industrial land within the existing industrial precinct and prevents the fragmentation of a large single lot, to increase the capacity of employment land;
- Reinforce and increase the competitiveness of the established Enfield/Strathfield South industrial precinct within the Greater Sydney Region through the high-quality facilities and high economic output;
- Achieve a suitable built form outcome that manages the inherit bulk and scale of higher density industrial uses to maintain and increase amenity in the surrounding area;
- Increase tree canopy coverage, supporting increased amenity to the surrounding area and reduce the urban heat island effects in the local area;
- Support job creation in proximity to workers and economic growth in the local area and broader Greater Sydney Region through significant economic benefits; and
- Create significant public benefit through the creation of a significant amount of additional jobs in the local area, and contributing to the improved efficiency and capacity of the logistical supply chain, transporting goods to consumers quicker.

5.2 Explanation of Provisions

The proposed amendments to the Strathfield LEP 2012 are explained in detail in the following sections.

5.2.1 Height of Buildings

The Height of Buildings Map (Sheets HOB_003 and HOB_006) are proposed to be amended from 12m to 35m. The proposed amendment will enable the development of a multi-level warehouse or distribution centre that promotes the efficient and orderly use of strategically important land by enabling the highest and best use of the Site. As demonstrated by the Indicative Reference Scheme, which comprises a building height of 34.6m, a three-level warehouse or distribution centre could be facilitated under the proposed control.

The proposed amendments to the Height of Buildings Map (Sheets HOB_003 and HOB_006) are illustrated in **Figure 25** below



Figure 25Height of Buildings Map – Strathfield Local Environmental Plan 2012Source: Ethos Urban

5.2.2 Floor Space Ratio

The Floor Space Ratio Map (Sheets FSR_003 and FSR_006) are proposed to be amended from 1:1 to 1.6:1. The proposed amendment will enable the development of a multi-level warehouse or distribution centre that will supply crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region. As demonstrated by the Indicative Reference Scheme, with a total GFA of 68,960m² equating to an FSR of 1.6:1, a three-level warehouse or distribution centre could be facilitated under the proposed control.

The proposed amendments to the Floor Space Ratio Map (Sheets FSR_003 and FSR_006) are illustrated in **Figure 26** below



Figure 26 Floor Space Ratio Map – Strathfield Local Environmental Plan 2012 Source: Ethos Urban

5.3 Mapping

To facilitate the proposed amendments described above, this Planning Proposal seeks to amend the following maps of the Strathfield LEP 2012:

- Height of Buildings Map:
 - Sheet HOB_003; and
 - Sheet HOB_006.
- Floor Space Ratio Map:
 - Sheet FSR_003; and
 - Sheet FSR_006.

The proposed maps have been prepared by Ethos Urban and included at **Appendix C**, with extracts reproduced in **Section 5.2** above.

5.4 Site-Specific Development Control Plan

A draft Site-Specific DCP has been prepared by Ethos Urban and is provided at **Appendix D**. It contains sitespecific provisions relating to the following:

- Density, Bulk and Scale;
- Architectural Design and Treatment;
- Landscaping;
- Sustainability;
- Parking and Accessibility; and
- Environmental Amenity.

The draft Site-Specific DCP has been prepared to provide clarity on the intended development outcome for the Site through the creation of a set of site-specific planning controls that the Council will be able to use in the assessment of future DAs.

5.5 Community Consultation

As part of the preparation of this Planning Proposal, the Applicant has undertaken community consultation with the surrounding community, as detailed in the following subsections.

5.5.1 Engagement Plan

A comprehensive Engagement Plan was drafted which included some important background research to inform the best approach to engagement for this Planning Proposal. It explored the development and engagement context in the area, issues and opportunities relating to the Site and local community, engagement requirements, demographic profile of the area, stakeholder mapping and engagement purpose.

The primary objectives for engaging can be summarised as follows:

- Share information on the progress of the design progress;
- Understand the effect of the proposal on the lives of community members during construction and operation;
- Reduce opposition and generate support for the project;
- Social licence to operate;
- Reputational risk; and
- Inform the SSDA design development.

The Site is located in an already industrially zoned and active precinct, set behind existing warehousing facilities which the nearby residential community are accustomed to living alongside. Equally the Engagement Plan identified numerous long-term opportunities in the proposed upgrading of the existing warehouse facility which outweighs the short-term challenges or issues that could arise primarily from the construction of the Site.

For this reason, the Engagement Plan recommended a 'Consult' engagement approach as per the IAP2 spectrum of engagement.

5.5.2 Engagement Approach

Given the minimal risks assessed in the Engagement Plan, Centuria sought to focus on informing the community and key stakeholders of this Planning Proposal well ahead of lodgement to seek early feedback and understand any potential concerns.

The following engagement activities were facilitated by Ethos Urban to support this Planning Proposal:

- A community hotline and email address whereby community members and local stakeholder could get in touch with queries about the project;
- A Community Notification Letter was distributed on Thursday 4 July 2024 to 165 residential letterboxes and 35 business letter boxes with the surrounding area illustrated in **Figure 27**. The Community Notification Letter is provided at **Appendix N** and set out the following information:
 - Project vision;
 - Project and planning status;
 - Site location image;
 - Details of what's being proposed for the Site; and
 - Information about current and future opportunities for engagement and to provide feedback.
- The opportunity for one-to-one or group stakeholder meetings, as well as a community webinar was there dependent on the level of interest feedback received by recipients of the letter.


Figure 27 Letter Distribution Map
Source: Ethos Urban

5.5.3 Feedback and Conclusions

Between 4 July and 30 August 2024, Ethos Urban did not receive any enquiries or feedback about the project, leading the project team to decide to not undertake any further engagement activities until later in the planning process when more detailed designs and information about the project become available.

It is noted that formal public consultation will take place as part of this Planning Proposal process in accordance with Sections 3.34 and 3.35 of the EP&A Act at a later date. Further, additional consultation will be undertaken as part of a future Development Application.

5.6 Project Timeline

An indicative timeline for this Planning Proposal, which is based on the nature and scale of this Planning Proposal, is provided in **Table 5** below.

Action	Timeframe
Stage 1 – Pre-lodgement	Complete
Lodgement	October 2024
Stage 2 – Planning Proposal	February 2025
Stage 3 – Gateway Determination	March 2025
Stage 4 – Post-Gateway	May 2025
Stage 5 – Public Exhibition & Assessment	September 2025
Stage 6 – Finalisation	December 2025

Table 5 Anticipated Project Timeline

6.0 Strategic Justification

This section provides the assessment of this Planning Proposal's strategic and site-specific merit and outlines its consistency with the relevant Commonwealth, State and Local legislation and planning strategies.

6.1 Strategic Justification

6.1.1 Section A – The Need for the Planning Proposal

Q1. Is the Planning Proposal a result of an endorsed local strategic planning statement, strategic study or report?

This Planning Proposal is a result of structural changes to the industrial logistics sector with increased demand for business to be located in close proximity to consumers and trade gateways, supporting the growth of business. It gives effect to the objectives and actions established under the *Greater Sydney Region Plan – A Metropolis of Three Cities* (Region Plan) and *Our Greater Sydney 2056 – Eastern City District Plan* (District Plan), as well as the *Strathfield 2040 Local Strategic Planning Statement* (Strathfield LSPS) discussed further in the following sections. In particular, the established industrial precinct which the Site sits is identified by Council in the Strathfield LSPS as a key regional economic driver, with Planning Priority 3 and 10 enforcing this:

- **Planning Priority P3** Freight corridors and local servicing meets needs with minimal impact on neighbourhoods and centres
- **Planning Priority P10** Industrial land and precincts deliver District and local urban services and provide activated spaces with minimal impact on neighbourhoods

This Planning Proposal seeks to leverage the size and strategic location of the Site to deliver crucial additional industrial logistics floor space to service the growing needs of the Eastern City District and Greater Sydney Region. It will enable business growth, allowing for the future provision of a facility that aligns with modern tenant requirements, maximises logistical efficiencies, and reduces transportation costs and delivery times for businesses.

Centuria recognises the significant opportunity at present to redevelop the Site for the highest and best use and create a flagship multi-level warehouse that will future proof the Site for coming decades. Multi-level warehouses are necessary to service continued population growth within the Greater Sydney Region, in particularly the increased density in in-fill areas. They are a recent trend as a result of structural changes to the industrial logistics sector. However, the number of sites within in-fill areas that can support the development typology is very limited due to the fundamental requirement for large unconstrained sites that can support them.

It is therefore crucial that large and unconstrained sites facilitate the highest and best use to support Sydney's future growth. The Site represents a large single lot under single ownership where the existing development is nearing the end of its lifecycle. It is near densely populated areas, adjacent to Enfield Intermodal Logistics Centre and in proximity to Sydney's key trade gateways. As such, it represents a significant opportunity to deliver crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region.

It has resulted from detailed market research and economic investigations, intended to address the ultimate needs of the industrial logistics sector, and the objectives and actions highlighted within strategic studies and reports. It is accompanied by an Indicative Reference Scheme that demonstrates a built form outcome that manages the inherit bulk and scale of higher density industrial uses to maintain and increase amenity in the surrounding area. It includes a careful selection of high-quality building finishes and colours combined with existing and proposed landscape planting on the Site and in the surrounding context to filter and blend the built form into its surrounding context.

Q2. Is the Planning Proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

This Planning Proposal is the best means of achieving the objectives and intended outcomes. In order to fully capitalise on the strategic merit of the Site, being a large single lot under single ownership within an established industrial precinct where the existing development nearing the end of its lifecycle, an amendment to the Strathfield LEP 2012 is required.

In preparing this Planning Proposal, three (3) options were considered to facilitate the intended outcomes, which are discussed in **Table 6** below.

Table 6Analysis of Alternatives

Option	Analysis				
Option 1 – Do nothing	Under this option, the Site would retain the current height of buildings (12m) and floor space ratio (1:1) development standards under the Strathfield LEP 2012.				
	The Site currently represents a significant opportunity to deliver crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region as it:				
	 Is a large single lot under single ownership where the existing development is nearing the end of its lifecycle; and 				
	 Is near densely populated areas, adjacent to Enfield Intermodal Logistics Centre and in proximity to Sydney's key trade gateways. 				
	As such, the redevelopment of the Site under the existing planning controls would significantly underutilise the Site for the coming decades, failing to facilitate the highest and best use of the Site, best respond to the objectives and actions of the strategic planning context and achieve the intended outcomes. In addition, the existing height of buildings development standard (12m) is not sufficient to support a typical single-level warehouse or distribution centre which typically range from 13.7m to 16.8m in height to support business requirements and operational efficiency.				
Option 2 – Amend the Strathfield LEP 2012 to	Under this option, the Strathfield LEP 2012 would be amended to facilitate an alternative multi- level warehouse or distribution centre design at a lower height and density.				
facilitate an alternative multi-level warehouse or distribution centre design	As outlined above, the Site currently represents a significant opportunity to deliver crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region. Centuria recognises the significant opportunity at present to redevelop the Site for the highest and best use and create a flagship multi-level warehouse that will future proof the Site for coming decades.				
	The lodgement of a Planning Proposal for less density would fail to future proof the Site for coming decades. In addition to failing to facilitate the highest and best use of the Site, best respond to the objectives and actions of the strategic planning context and achieve the intended outcomes.				
Option 3 – Amend the Strathfield LEP 2012 to facilitate a three-level warehouse or distribution centre	This option represents the selected option to facilitate the construction of a three-level warehouse or distribution centre, as depicted by the Indicative Reference Scheme described in Section 4.0 . It is considered the best way of achieving the objectives and intended outcomes, facilitating the highest and best use of the Site and appropriately responding to the objectives and actions of the strategic planning framework.				

6.1.2 Section B – Relationship to the Strategic Planning Framework

Q3. Will the Planning Proposal give effect to the objectives and actions of the applicable regional, or district plan or strategy (including any exhibited draft plans or strategies)?

Greater Sydney Region Plan – A Metropolis of Three Cities & Our Greater Sydney 2056 – Eastern City District Plan

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.

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. This Planning Proposal is consistent with the relevant directions and objectives under the Region Plan and the relevant planning priorities of the District Plan, as outlined in **Table 7** on the following page.

Table 7 Consistency of this Planning Proposal with the Region and District Plan

Objectives	Consistency				
Direction 1 – A City Supported by Ir	irrastructure				
Objective 2 – Infrastructure aligns with forecast growth – growth infrastructure compact	This Planning Proposal responds to structural changes to the industrial logistics sector with increased demand for business to be located in close proximity to consumers and trade gateways, supporting the growth of business. It leverages the size and strategic location of the Site to deliver crucial additional industrial logistics floor space to service				
Objective 3 – Infrastructure adapts to meet future needs Planning Priority E1 – Planning for	the growing needs of the Greater Sydney Region. It will enable business growth, providing a facility that aligns with modern tenant requirements, maximises logistical efficiencies, and reduces transportation costs and delivery times for businesses.				
a city supported by infrastructure	Further, it seeks to enable the delivery of industrial logistics floor space in close proximity to the adjacent Enfield Intermodal Logistics Centre, which includes dedicat freight lines to Port Botany, Sydney Airport and Regional NSW.				
Direction 6 – A Well-Connected Cit	y				
Objective 16 – Freight and logistics network is competitive and efficient Planning Priority E9 – Growing international trade gateways	This Planning Proposal responds to current demand and changing dynamics in the industrial logistics sector, contributing to the fulfilment of the shortfall in industrial logistics floor space in close proximity to trade gateways and consumers to support the growth of business in the Eastern City District.				
	Specifically, it responds to the need to accommodate more than double the amount of freight expected over the next 40 years (from 2016) as identified by the Region Plan. It will enable businesses to be located in close proximity to consumers and Sydney's trade gateways to reduce the cost of moving freight and increase efficiency and productivity while minimising traffic and amenity impacts.				
	The District Plan highlights the importance of Port Botany and Sydney Airport as the trade gateways for Sydney and Australia, which are expected to grow significantly, with the container traffic at Port Botany projected to grow from 2.4 million to 8.4 million containers by 2050. It also identifies that, even though larger scale freight and logistics businesses may locate in the Western Parkland City, a significant freight and logistics task will remain in the Eastern City District due to the competitive advantages and efficiencies afforded by proximity to Sydney's key gateways and the intermodal terminals, such as the Enfield Intermodal Logistics Centre.				
	This Planning Proposal reflects the Site's strategic context nearby the Enfield Intermodal Logistics Centre, affording it valuable connections to dedicated freight lines to regional NSW, Port Botany and Sydney Airport, alongside the competitive advantage of businesses being located within the Eastern City District. It will provide a facility to meet the needs of businesses and help meet demand of businesses wanting to locate in the Eastern City District, encourage economic growth and a more efficient logistics supply chain.				
	Further, this Planning Proposal supports the retention of industrial land for logistics uses, helping to ensure suitable capacity to facilitate ongoing operation and long-term				

Direction 7 – Jobs and Skills for the City

Objective 23 – Industrial and urban services land is planned, retained and managed Planning Priority E12 – Retaining and managing industrial and urban services land	As above, this Planning Proposal supports the retention of industrial land for logistics uses within the established industrial precinct. It manages land use conflict by being located within an established industrial precinct, managing environmental impacts to nearby sensitive land uses to support the protection of industrial land within the existing industrial precinct and prevents the fragmentation of a large single lot, to increase the capacity of employment land.
	The District Plan identifies 1,497 ha of industrial and urban services land, spread over 58 separate precincts within the Eastern City District, representing approximately 11% of Greater Sydney's total stock of industrial and urban services land. This land contributed approximately \$15.4 billion or 6% to NSW GDP in 2015, and also accommodated approximately 123,000 jobs (15% of jobs) in the District.
	In South Strathfield/Enfield, there is a total of 175 ha of land dedicated to industrial and urban services which is supported by the Enfield Intermodal Logistics Centre. The District Plan reiterates the Eastern City District is to provide cost competitive and well located land for industries and services that support businesses in the Sydney CBD,

growth within the established industrial precinct.

Objectives	Consistency				
	other centres and Greater Sydney Region's existing international trade gateways of Port Botany and Sydney Airport.				
	This Planning Proposal forms a large underutilised Site within a key industrial precinct supported by the Enfield Intermodal Logistics Centre. It will prevent the encroachment of sensitive uses that can impact on these operations and support the operation of Enfield Intermodal Logistics Centre providing support services and 24/7 supply chain operators served by substantial road and rail infrastructure to both Port Botany and Sydney Airport.				
	In addition, this Planning Proposal will enable the significant growth in jobs on the Site with the following estimates provided by HillPDA (refer to Appendix M) based on the supporting Indicative Reference Scheme:				
	 Construction – 1,787 total job-years including 478 direct full-time equivalent job- years; and 				
	 Operation – 1,379 total ongoing full-time equivalent jobs including 467 direct full- time equivalent jobs. 				
Direction 8 – A City in its Landscap	be a second s				
Objective 30 – Urban tree canopy cover is increased Planning Priority E17 – Increasing urban tree canopy cover and delivering Green Grid connections	Concept Landscape Plan (Appendix E) comprising a total tree canopy coverage of 4,171m ² (9.7%). This represents a significant increase on the existing development on t Site through the retention of 48 trees and planting of 145 new trees, resulting in 193				
Direction 9 – An Efficient City					
Objective 33 – A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change Planning Priority E19 – Reducing carbon emissions and managing energy, water and waste efficiently	The existing development on the Site comprises aging industrial assets that were constructed approximately four decades ago. This Planning Proposal will enable the redevelopment of the Site for a multi-level warehouse or distribution centre that will contribute to net-zero emissions by 2050, including more efficient and renewable energy systems.				
	Further, the Site's proximity to the Enfield Intermodal Logistics Centre allows for freight to potentially be transported by rail, leading to a reduction in heavy vehicle usage and subsequent reduction in carbon emissions.				

Q4. 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?

Strathfield 2040 – Local Strategic Planning Statement

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.

This Planning Proposal is consistent with the relevant themes and planning priorities under the Strathfield LSPS, as outlined in **Table 8** below.

Table 8	Consistency of this Planning Proposal with the Strathfield LSPS
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Objectives	Consistency				
Infrastructure and Collaboration					
Planning Priority P3 – Freight corridors and local servicing meets needs with minimal impact on neighbourhoods and centres	This Planning Proposal supports the function of key freight corridors to ensure deliveries and on demand freight are enabled across the LGA and District. It is located along Cosgrove Road, identified as a key local freight route, and seeks to respond to structural changes to the industrial logistics sector with increased demand for business to be located in close proximity to consumers and trade gateways, supporting the growth of business.				
	In addition, this Planning Proposal appropriately manages and ensures amenity is maintained to the surrounding residential areas, particularly in regard to visual, noise and traffic impacts, as outlined in Section 7.0 . Further, this Planning Proposal supports compatible land uses surrounding the Enfield Intermodal Logistics Centre as it seeks to				

Consistency

enable the development of a multi-level warehouse on the Site, supporting the increased capacity of freight and logistics as well as the potential utilisation of the intermodal centre.

Productivity

Planning Priority P10 – Industrial land and precincts deliver District and local urban services and provide activated spaces with minimal impact on neighbourhoods This Planning Proposal supports the retention of industrial land through the efficient and orderly use of strategically important land by enabling the highest and best use of the Site. It leverages the Site's proximity to Enfield Intermodal Logistics Centre and Sydney's key trade gateways of Port Botany and Sydney Airport to maximise logistical efficiencies and significantly reduce transportation costs for businesses and delivery times to consumers.

It will further promote the retention of industrial land as it will act as a catalyst for further investment in the locality, supporting the long-term potential, objectives and economic output of employment lands within the Strathfield LGA and Greater Sydney Region more broadly.

The Strathfield LSPS elaborates on the importance of industrial land to the LGA, which is illustrated in **Figure 28**. It highlights that the development of the Enfield Intermodal Logistics Centre by NSW Ports has further supported the future infrastructure demands of the metropolitan economy with it represents a key trade gateway connecting the people and business of NSW to global markets.



Objectives	Consistency				
	Further, the Strathfield LSPS outlines that development and renewal of industrial areas must support the LGA's attraction as a desirable place to live and work. This Planning Proposal offers an opportunity to revitalise the Site, improving the overall amenity of the industrial precinct for residents and workers, creating a building that serves a higher employment density, but is more efficient and sustainable.				
	The supporting Indicative Reference Scheme demonstrates a state of the art facility that aligns with Centuria's vision for a flagship multi-level warehouse or distribution centre that will future proof the Site for the coming decades. It will also promote efficient and sustainable development that aligns with the needs of modern businesses. It will also achieve significantly greater tree canopy coverage, with a total of 4,171m ² (9.7%) created through the retention of 48 trees and planting of 145 new trees on the Site.				
	The Strathfield LSPS also identifies that the number of jobs within the LGA is forecast to increase by 33% between 2019 and 2041, equating to approximately 9,500 new jobs with most to be in the industrial sector, making up 32% of the projected growth. This Planning Proposal will enable an estimated total of 467 direct full-time equivalent jobs during operation, with a total of 1,379 total ongoing full-time equivalent jobs including indirect effects. It therefore represents a significant provision of jobs that will contribute to the employment and productivity of the LGA.				
Sustainability					
Planning Priority P16 – A healthy built environment delivers sustainable and resource efficient outcomes	The existing development on the Site comprises aging industrial assets that were constructed approximately four decades ago. This Planning Proposal will enable the redevelopment of the Site for a multi-level warehouse or distribution centre that will contribute to net-zero emissions by 2050, including more efficient and renewable energy systems.				
	Further, the Site's proximity to the Enfield Intermodal Logistics Centre allows for freight to potentially be transported by rail, leading to a reduction in heavy vehicle usage and subsequent reduction in carbon emissions.				

Q5. Is the Planning Proposal consistent with any other applicable State and regional studies or strategies?

This Planning Proposal's consistency with applicable State and regional studies or strategies is outlined in **Table 9** below.

Table 9 Consistency with other State and Regional Studies or Strategies

Strategy	Consistency				
Future Transport Strategy 2056	The <i>Future Transport Strategy 2056</i> 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.				
	This Planning Proposal supports the retention of industrial land directly adjacent to Enfield Intermodal Logistics Centre. It manages land use conflict by being located within an established industrial precinct, managing environmental impacts to nearby sensitive land uses to support the protection of industrial land within the existing industrial precinct and prevents the fragmentation of a large single lot, to increase the capacity of employment land.				
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				

Strategy	Consistency				
	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.				
	This Planning Proposal will enable the creation of additional industrial logistics floor space in proximity to Enfield Intermodal Logistics Centre and Sydney's key trade gateways of Port Botany and Sydney Airport to maximise logistical efficiencies and significantly reduce transportation costs for businesses and delivery times to consumers. It will support the creation of a flagship multi-level warehouse that will future proof the Site for coming decades and align with the needs of modern tenant requirements enabling improved efficiency in storage and operations, integration of advanced technologies, flexibility and scalability, improved cost-effectiveness and sustainability.				
'Better Placed' and 'Greener Places'	<i>Better Placed</i> 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.				
	This Planning Proposal is consistent with the key objectives of Better Placed as demonstrated by the Indicative Reference Scheme which has been tailored to better fit the site, optimising both functionality and integration within the existing industrial hub. Its layout and structure are intended to enhance operational efficiency and support a cohesive industrial environment, improving upon existing facilities.				
	<i>Greener Places</i> is a Green Infrastructure policy released by the Government Architect NSW in October 2017. It aims to create a healthier, more liveable and sustainable urban environment by improving community access to recreation and exercise, supporting walking and cycling connections, and improving the resilience of urban areas.				
	This Planning Proposal is consistent with <i>Greener Places</i> as it seeks to enhance the landscape and increase the overall tree canopy cover on the Site to minimise the impacts of the urban heat island effect. It will achieve significantly greater tree canopy coverage, with a total of 4,171m ² (9.7%) created through the retention of 48 trees and planting of 145 new trees on the Site.				

Q6. Is the Planning Proposal consistent with applicable State Environment Planning Policies?

This Planning Proposal's consistency with the State Environmental Planning Policies is outlined in **Table 10** below.

Table 10 Consistency with State Environmental Planning Policies

State Environmental Planning Policies	Consistent		nt	Assessment
	Yes	No	N/A	
State Environmental Planning Policy (Biodiversity and Conservation) 2021			-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Exempt and Complying Development Codes) 2008			-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Housing) 2021			-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Industry and Employment) 2021			-	Not applicable to the proposed LEP amendments. It is noted that Chapter 3 of the Industry and Employment SEPP relates to advertising and signage.
				Future development will include signage and will satisfy Section 3.6 of the Industry and Employment SEPP as part of a future detailed Development Application.

State Environmental Planning Policies	Consistent		Assessment
State Environmental Planning Policy (Planning Systems) 2021		-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Precincts—Central River City) 2021		-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021		-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Precincts—Regional) 2021		-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Precincts—Western Parkland City) 2021		-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Primary Production) 2021		-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Resilience and Hazards) 2021	~		Chapter 4 of the Resilience and Hazards SEPP aims to promote the remediation of contaminated land.
			A Preliminary Site Investigation (Appendix J) has been prepared and concludes that the Site can be made suitable for the future land use and development from a contamination perspective. Refer to Section 7.6 for further discussion.
State Environmental Planning Policy (Resources and Energy) 2021		-	Not applicable to the proposed LEP amendments.
State Environmental Planning Policy (Sustainable Buildings) 2022	 ✓ 		Any future development will be required to satisfy the provision of the <i>State Environmental Planning Policy</i> <i>(Sustainable Buildings) 2022</i> as part of a future detailed Development Application.
State Environmental Planning Policy (Transport and Infrastructure) 2021	✓		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). It is noted that TfNSW will be consulted with respect to this Planning Proposal during the Public Exhibition phase, post-Gateway Determination.

Q7. Is the Planning Proposal consistent with the applicable Ministerial Directions (Section 9.1 Directions) or key government priority?

This Planning Proposal's consistency with Section 9.1 Directions is assessed in **Table 11** below.

Table 11 Assessment of Section 9.1 Directions

Ministerial Direction	Consistent		nt	Assessment	
	Yes	No	N/A		
Focus Area 1 – Planning Systems		,	•		
1.1 Implementation of Regional Plans	~			As discussed in Section 6.1 , this Planning Proposal is consistent with the Region Plan.	
1.2 Development of Aboriginal Land Council land			-	Not applicable.	
1.3 Approval and Referral Requirements			-	Not applicable.	
1.4 Site Specific Provisions			-	Not applicable.	

Ministerial Direction	Consiste	nt	Assessment			
1.4A Exclusion of Development Standard from Variation		-	Not applicable.			
Focus Area 1 – Planning Systems – Place-based						
1.5 Parramatta Road Corridor Urban Transformation Strategy		-	Not applicable.			
1.6 Implementation of North West Priority Growth Area Land Use and Infrastructure Implementation Plan		-	Not applicable.			
1.7 Implementation of Greater Parramatta Priority Growth Area Interim Land Use and Infrastructure Implementation Plan		-	Not applicable.			
1.8 Implementation of Wilton Priority Growth Area Interim Land Use and Infrastructure Implementation Plan		-	Not applicable.			
1.9 Implementation of Glenfield to Macarthur Urban Renewal Corridor		-	Not applicable.			
1.10 Implementation of Western Sydney Aerotropolis Plan		-	Not applicable.			
1.11 Implementation of Bayside West Precincts 2036 Plan		-	Not applicable.			
1.12 Implementation of Planning Principles for the Cooks Cove Precinct		-	Not applicable.			
1.13 Implementation of St Leonards and Crows Nest 2036 Plan		-	Not applicable.			
1.14 Implementation of Greater Macarthur 2040		-	Not applicable.			
1.15 Implementation of the Pyrmont Peninsula Place Strategy		-	Not applicable.			
1.16 North West Rail Link Corridor Strategy		-	Not applicable.			
1.17 Implementation of the Bays West Place Strategy		-	Not applicable.			
1.18 Implementation of the Macquarie Park Innovation Precinct		-	Not applicable.			
1.19 Implementation of the Westmead Place Strategy		-	Not applicable.			
1.20 Implementation of the Camellia- Rosehill Place Strategy		-	Not applicable.			
1.21 Implementation of South West Growth Area Structure Plan		-	Not applicable.			
1.22 Implementation of the Cherrybrook Station Place Strategy		-	Not applicable.			
Focus Area 2 – Design and Place	· · · · ·	•				
Focus Area 3 – Biodiversity and Conservat	ion					

Ministerial Direction	(Consistent		Assessment
3.1 Conservation Zones			-	Not applicable.
3.2 Heritage Conservation			-	Not applicable.
3.3 Sydney Drinking Water Catchments			-	Not applicable.
3.4 Application of C2 and C3 Zones and Environmental Overlays in Far North Coast LEPs			-	Not applicable.
3.5 Recreation Vehicle Areas			-	Not applicable.
3.6 Strategic Conservation Planning			-	Not applicable.
3.7 Public Bushland			-	Not applicable.
3.8 Willandra Lakes Region			-	Not applicable.
3.9 Sydney Harbour Foreshores and Waterways Area			-	Not applicable.
3.10 Water Catchment Protection			-	Not applicable.
Focus Area 4 – Resilience and Hazards		-		
4.1 Flooding	~			This Planning Proposal is consistent with the relevant flood related policies, manuals, guidelines, or studies applicable to the Site. A Flood Management Report (Appendix K) identifies that the Site is located within the Cooks Rivers catchment area and is identified as being only partially inundated during the PMF event. It outlines the flood affectation is to be considered negligible in terms of flood storage, changes of flood levels, and velocities.
4.2 Coastal Management			-	Not applicable.
4.3 Planning for Bushfire Protection			-	Not applicable.
4.4 Remediation of Contaminated Land	~			A Preliminary Site Investigation (Appendix J) has been prepared and concludes that the Site can be made suitable for the future land use and development from a contamination perspective. Refer to Section 7.6 for further discussion.
4.5 Acid Sulfate Soils	Ý			This Site is identified as being located in an area of extremely low probability of occurrence of acid sulfate soils. The Acid Sulfate Soils Map – Sheet ASS_06 of Strathfield LEP 2012 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. Given the site levels (RL 12-18), the levels (>RL 5 m) of the Class 4 land in in close proximity to the Site and noting that bulk excavation is not expected for the Indicative Reference Scheme, an intrusive acid sulfate soil investigation is not considered warranted. For further discussion, refer to the Preliminary Site Investigation (Appendix J).

Ministerial Direction		Consistent	Assessment
5.1 Integrating Land Use and Transport	~		This Planning Proposal will take advantage of the Site's strategic context, being located in close proximity to densely populated areas, adjacent to Enfield Intermoda Logistics Centre, in proximity to Sydney's key trade gateways, and existing regional road network. It will utilise its strategic location to provide an increased density of jobs.
5.2 Reserving Land for Public Purposes		-	Not applicable.
5.3 Development Near Regulated Airports and Defence Airfields		-	Not applicable.
5.4 Shooting Ranges		-	Not applicable.
5.5 High Pressure Dangerous Goods Pipeline		-	Not applicable.
Focus Area 6 – Housing		· · ·	
6.1 Residential Zones		-	Not applicable.
6.2 Caravan Parks and Manufactured Home Estates		-	Not applicable.
Focus Area 7 – Industry and Employment		μ	
7.1 Business and Industrial Zones	√		This Planning Proposal is entirely consistent with this direction as it seeks to increase the provision of employment floor space able to be delivered on the Site. It contributes to the retainment of the industrial precinct for industrial uses and will be a catalyst for further investment in the locality, supporting the long- term potential, objectives and economic output of employment lands within the Strathfield LGA and Greater Sydney Region more broadly.
7.2 Reduction in non-hosted short-term rental accommodation period		-	Not applicable.
7.3 Commercial and Retail Development along the Pacific Highway, North Coast		-	Not applicable.
Focus Area 8 – Resources and Energy			
8.1 Mining, Petroleum Production and Extractive Industries		-	Not applicable.
Focus Area 9 – Primary Production			-
9.1 Rural Zones		-	Not applicable.
9.2 Rural Lands		-	Not applicable.
9.3 Oyster Aquaculture		-	Not applicable.
9.4 Farmland of State and Regional Significance on the NSW Far North Coast		-	Not applicable.

6.2 Site-Specific Merit

6.2.1 Section C – Environmental, Social and Economic Impact

Q8. Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the Planning Proposal?

This Planning Proposal is unlikely to result in any impact on critical habitat or threatened species, populations or ecological communities or their habitats, given the Site's urban context and industrial history.

Q9. Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

A detailed assessment of the environmental effects as a result of this Planning Proposal is provided in **Section 7.0**, which is supported by technical reports (see **Appendices**). Relevant management measures are identified where appropriate and, on this basis, no unacceptable impacts are likely to result from this rezoning request or future development on the Site.

Q10. Has the Planning Proposal adequately addressed any social and economic effects?

The economic and social impacts arising from this Planning Proposal are identified in **Section 7.9**, supported by a Social and Economic Impact Assessment (**Appendix M**). This Planning Proposal represents minor adjustments to the existing characteristics and usage of the Site and surrounds, with the potential to yield social benefits to livelihoods by facilitating additional economic activity within the site.

As such, it represents a net social positive impact as it will support job creation in proximity to workers and economic growth in the local area and broader Greater Sydney Region through the following key significant economic benefits:

- During construction:
 - 1,787 total job-years including 478 direct full-time equivalent job-years; and
 - \$676 million in total gross output, including \$230 million in direct gross output.
- During operation:
 - 1,379 total ongoing full-time equivalent jobs including 467 direct full-time equivalent jobs; and
 - \$503 million in total economic output annually, including \$189 million in direct economic output.

Further, this Planning Proposal will support significant public benefit through the creation of a significant amount of additional jobs in the local area, and contributing to the improved efficiency and capacity of the logistical supply chain, transporting goods to consumers quicker.

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

Q11. Is there adequate public infrastructure for the Planning Proposal?

An analysis of service and utilities infrastructure is discussed in **Section 7.8**, with a detailed analysis included as part of the Service Infrastructure Assessment (**Appendix L**). It outlines that the Site can be suitably serviced to support the Indicative Reference Scheme and will be subject to a detailed service and utility assessment as part of a future detailed Development Application.

Further, this Planning Proposal will leverage investment made by the State Government into major road upgrades to the surrounding regional road network such as the road upgrades to the M4 and M8 Motorways, WestConnex and the Sydney Gateway reducing travel times to Sydney's key trade gateways.

6.2.3 Section E – State and Commonwealth Interests

Q12. What are the views of state and federal public authorities and government agencies consulted in order to inform the Gateway determination?

The Scoping Proposal was referred to Transport for NSW (TfNSW) and Sydney Water as part of the prelodgement consultation process, with preliminary advice provided to the Applicant (refer to **Section 1.2.2**). The Applicant has addressed the matters raised in this Planning Proposal, where appropriate.

In addition, consultation with TfNSW has been undertaken by Ason Group (traffic consultant) who issued an Early Consultation Technical Note on 19 June 2024, with feedback received on 04 July 2024 and 13 August 2024.

Where necessary, further consultation with relevant authorities will be undertaken as required in accordance with the Gateway Determination. In addition, State and Commonwealth authorities will have the opportunity to provide comments on this Planning Proposal as part of its formal exhibition following satisfaction of the Gateway Determination conditions.

7.0 Environmental Assessment

This section provides an overview of the key environmental assessment matters relating to this Planning Proposal, as well as addressing matters that justify the site-specific merit of this Planning Proposal.

7.1 Urban Design

A Concept Design Report has been prepared by Nettletontribe Architects and is included at **Appendix A**. It describes the Indicative Reference Scheme and identifies how it has been informed by the site analysis and implemented key built form and articulation components to minimise the inherit bulk and scale of the development type.

7.1.1 Density, Bulk and Scale

The building and landscaping setbacks have been selected based on an analysis of the surrounding context in order to provide a suitable level of amenity to the surrounding area. The proposed setbacks enable the retention of existing trees, as well as the planting of new canopy trees that will create a visual buffer to surrounding areas and contribute to minimising the density, bulk and scale the development type.

The Draft Site-Specific DCP (**Appendix D**) establishes the following building setbacks:

- 10m along Cosgrove Road;
- 7m along Hope Street; and
- 5m to Madeline Street.

It also identifies the requirement for a 4m landscape to all street frontages. The Indicative Reference Scheme's building and landscaping setbacks are depicted in **Figure 29** below.



Figure 29 Site Plan – Setback Illustration Source: Nettletontribe Architects

The layout and built form of the Indicative Reference Scheme includes a series of design measures to break down the overall bulk of the development type. These include the breakdown of horizontal layers, placed of ancillary office space on the corners of the built form, and glazing across the warehouse façade, as illustrated in **Figure 30**. The combination of these items assist in breaking down the vertical and horizontal bulk and scale of the development, supported by façade articulation and materiality (discussed in the following section), to reduce the overall density associated with the development type.



Figure 30 Built Form and Façade Articulation

Source: Nettletontribe Architects

7.1.2 Façade Articulation and Materiality

In order to further manage the bulk and scale stemming from the development typology, careful consideration has been given to the façade articulation and materiality to ensure it visually integrates into its surrounding context. The ancillary office space is used to anchor the visual interest of the development, utilising the ability to provide a high quantum of glazing supported by high quality materials. The use of glazing for ancillary office space, combined with the co-location of car parking, assists in creating a human scale of the development to the immediate surrounding context.

The design of the warehouse is complementary to the surrounding industrial context, inclusive of metal sheeting to warehouse walls, horizontal façade pattern glazing breaks in the warehouse façade. The materiality of the warehouse includes 'jasper' and 'shale grey' coloured profiled metal sheeting with blue glazing, while the office materiality comprises predominantly clear glass. The façade design is considerate of the potential noise impacts of the hardstand and ramps for the movement of trucks throughout the development and between the levels of the warehouse, being inclusive of perforated mesh/acoustic ramp screening.

The facade articulation and materiality of the Indicative Reference Scheme is depicted in **Figure 31** below, with a perspective render depicting the façade articulation and materiality provided in **Figure 32** following.



 Figure 31
 Axonometric Illustration of the Indicative Reference Scheme from the south-west

 Source: Nettletontribe Architects



Perspective Render of the Indicative Reference Scheme - Corner of Cosgrove Rd and Hope St Figure 32 Source: Nettletontribe Architects

Given the future development may be visible from surrounding public spaces, the draft Site-Specific DCP (Appendix D) incorporates the requirement for artistic elements are to be implemented into the façade design on the eastern and southern elevations. It may include (but is not limited to) mural artwork, green walls, or perforated mesh screens with custom pattern as depicted in Figure 33 below.







Green Wall



Perforated Mesh Screens With Custom Pattern

Artistic Element Examples Figure 33 Source: Nettletontribe Architects

7.1.3 Overshadowing

To assess the Indicative Reference Scheme's overshadowing impact, shadow diagrams have been prepared and included in **Figure 34** below.



9am Summer
Figure 34 Shadow Diagrams

12pm Summer

3pm Summer

Source: Nettletontribe Architects

During winter, it is expected that the Indicative Reference Scheme will overshadow surrounding industrial properties in the immediate vicinity, but will not overshadow any residential land or public open space between 9am and 3pm at the winter solstice. During summer, the Indicative Reference Scheme will result in minimal overshadowing to surrounding areas.

7.2 Visual

A Visual Impact Assessment (VIA) has been prepared by Geoscapes and included at **Appendix F**. It describes and assesses the existing and proposed views of the Indicative Reference Scheme to surrounding selected viewpoints. It provides an overall visual impact rating for each viewpoint in accordance with the *Guidelines for Landscape and Visual Impact Assessment* (GLVIA3), rating the impacts from negligible to substantial.

The viewpoints assessed by the VIA include twelve (12) viewpoint locations, with VP1-8 being selected for assessment by Council, and VP9-12 being selected by the Applicant. The selected viewpoint locations are illustrated in **Figure 35** below.



Figure 35 Viewpoint Locations

Source: Geoscapes

The key findings of the VIA are summarised as follows:

- The landscape value of the Site is negligible based on the character and context, with the immediate surrounding character of the adjoining street being heavily influenced by industrial development;
- The visual catchment is localised, with visibility of the proposal largely contained to adjoining and surrounding streets;
- While there are parks within the visual catchment, being Dean Reserve, Begnell Field and Cooke Park, the visual catchment does not contain elements that have high scenic amenity value such as large, open water bodies or iconic features;
- There are no significant views within the visual catchment;
- The Indicative Reference Scheme will create a variety of visual impacts for a range of visual receptors, with the highest visual impacts being predominantly for residential areas as located in close proximity to the development;

- The following judgments were made about the various level of impacts of the proposed development on the assessed viewpoints:
 - High/Moderate visual impacts Madeline Street Near No.116, Belfield (VP9)
 - Moderate visual impacts Madeline Street Near No.122, Belfield (VP4)
 - Moderate/Minor visual impacts Close to Intersection of Madeline Street and Hope Street, Strathfield South (VP12);
 - Minor visual impacts Cookes Skate Park, Belfield (VP5), Intersection of Bede Street and Anselm Street, Strathfield South (VP7), Dean Reserve, Strathfield South (VP10), Close to Junction of Cosgrove Road & Hope Street, Strathfield South (VP11);
 - Minor/Negligible visual impacts Junction of Cosgrove Rd & Cleveland St, Strathfield South (VP1), Intersection of Cosgrove Road and Blanche Street, Strathfield South (VP2), Begnell Field, Belfield (VP3), Excelsior Avenue Near No.11, Belfield (VP6); and
 - Negligible visual impacts Intersection of Mainline Road & Wentworth Street, Strathfield South (VP8).

Given that VP4 and VP9 were identified as the two (2) viewpoints to have the highest visual impact, the associated photomontages have been included in **Table 12** below.

Table 12 Visual Impact Assessment – VP4 and VP9

Viewpoint 4 – Madeline Street No.122, Belfield – Looking Northwest





Existing View

Year 15

Distance from Site Boundary	345m
Description of Existing View	This viewpoint location was selected by Strathfield Council and the baseline photograph was taken from the road adjacent to 122 Madeline Street. Views from the footpath on the eastern side of the road would vary and be restricted by existing street trees. The same conclusions would apply for the footpath on the western side of the road.
Visual Receptor Sensitivity	Residential visual receptors are generally more critical of their views, any changes created by a development are usually permanent and might be seen from the street on a daily basis. Industrial development to the north is barely visible due to the presence of other residential dwellings, street trees and the road chicane which is seen in the background of the baseline. The view is fairly typical of what would be seen from residential streets in the area with views contained to the foreground. Therefore, it is judged that the sensitivity of this visual receptor is medium .
Magnitude of Change	The Indicative Reference Scheme will be seen above the tree line and be clearly noticeable as an industrial development. The view would be significantly altered by its presence, views are direct and at medium/close range with changes over a noticeable horizontal and vertical extent. Therefore, it is judged that the residual magnitude of change is high .
Significance of Visual Impact	Moderate

Viewpoint 9 – Madeline Near No.116, Belfield – Looking Northwest



Existing View

Year 15

Distance from Site Boundary	215m
Existing View	This viewpoint was an additional location identified by Geoscapes following drone analysis. It has a similar aspect to Viewpoint 4 selected by Council, but is located further north and closer to the Site. Views from the footpath would vary and be restricted by existing street trees.
Visual Receptor Sensitivity	At this location industrial development to the north is slightly more visible due to the closer proximity of the viewpoint. The top of the existing development on the Site can be partially seen above the tree line. Similarly to VP4, views are limited to the foreground and therefore, it is judged that the sensitivity of this visual receptor is also medium .
Magnitude of Change	There would be a substantial change to the baseline, with the Indicative Reference Scheme creating a new focus and having a defining influence on the view. Views are direct and at close range with changes over a wide horizontal and vertical extent. Therefore, it is judged that the magnitude of change is very high .
Significance of Visual Impact	High/Moderate

The Indicative Reference Scheme is expected to be clearly noticeable as an industrial development with views along Madeline Street within the residential area to the south-east of the Site to be significantly altered by its presence. The views from the south-east of the Site benefit from existing landscaping that screen the residential area to the industrial. As shown in VP5 and VP6 (refer to **Appendix F**), its visibility is limited to other parts of the residential area to the south-east by Cooke Park and existing mature vegetation.

The visual receptor sensitivity from VP4 and VP9 are judged to be medium, with the top of the existing development on the Site partially seen above the tree line and the views being fairly typical of what would be seen from residential streets in the area with views contained to the foreground. The Site is designated for industrial development (E4) under the Strathfield LEP 2012 and has a current industrial use. Therefore, a new industrial development in this location is not out of place with the existing or future character of the area.

The Indicative Reference Scheme has been developed with consideration for its surrounding context to minimise the impacts of density, bulk and scale to the surrounding areas, while also achieving the objectives and vision for the Site. It demonstrates a careful selection of high-quality building finishes and colours combined with existing and proposed landscape planting on the Site and in the surrounding context to filter and blend the built form into its surrounding context.

For these reasons, this Planning Proposal is considered suitable from a visual impact perspective.

7.3 Transport

A Transport Assessment has been prepared by Ason Group and is included at **Appendix G**. It assesses the transport matters relating to this Planning Proposal, including key matters such as parking provision and impact on the surrounding road network.

7.3.1 Parking

The Planning Proposal is accompanied by a draft Site-Specific DCP which seeks to confirm the parking requirements for the Site. The parking requirements of the draft Site-Specific DCP are outlined in **Table 13** below.

Table 13 Parking Assessment

Land Use	GFA	DCP 2005 Parking Rate (minimum)	Minimum Parking Requirement
Warehouse	62,360m ²	1 space / 300m² GFA	208
Office	6,600m²	1 space / 100m ² GFA	66
Total	69,900		274

The Indicative Reference Scheme comprises a total of 353 car parking spaces and therefore complies with the draft Site-Specific DCP.

7.3.2 Traffic Assessment

Traffic Generation

Following consultation with TfNSW, detailed in the Transport Assessment (**Appendix G**), a trip rate of 0.202 trips per 100m² of GFA in the AM and PM peak was adopted for modelling purposes. A secondary trip rate was also adopted for the purposes of a sensitivity assessment to TfNSW's proposed rate of 0.25 trips per 100m² GFA.

The estimated trip generation of the Indicative Reference Scheme is outlined in Table 14 below.

Table 14 Trip Generation

Trip Generation	Proposed GFA (m²)	Rate	Peak Hour Trip Generation (AM & PM)	
Proposed	— 68,960m ²	0.202 trips / 100m ² of GFA	139	
Sensitivity	- 68,96011	0.25 trips / 100m ² of GFA	172	
Difference	-	-	+33	

A comparative assessment of the traffic generation (inbound and outbound combined) between the existing vehicular trip generation and proposed development trip generation is provided in **Table 15** below.

Table 15 Traffic Generation Comparison

Scenario	Land Use	Trip Generation (vehicles/hour)		
		AM Peak	PM Peak	
1	Existing Site – Survey	44	19	
2	Approved Permissible Development (FSR of 1:1)	87	87	
3	Planning Proposal (FSR of 1.6:1)	139	139	
4	Net – Existing Permissible Development 2 minus 1	43	68	
5	Net – Proposed Development 3 minus 1	95	120	

The existing development on the Site operates with a trip generation below the permissible level, and therefore the base case model was adjusted for modelling purposes to include the additional net generation from the permissible development, and the net traffic generation from the proposed development.

It identifies that the Indicative Reference Scheme is expected to result in the additional trip generation (above the existing use) of 95 vehicles during the AM peak hour and 120 vehicles during the PM peak hour.

Traffic Modelling

For the undertaking of the traffic modelling, a detailed vehicle class split has been modelled to 71% light vehicle and 29% heavy vehicle resulting from the proportional distribution of trips to and from the Site. A growth rate of 1% per annum has been applied to the background road network traffic volume, as aligned with the growth rate agreed upon by TfNSW.

In order to assess the traffic impacts of this Planning Proposal, SIDRA Network Traffic modelling has been undertaken under three (3) scenarios, including:

- Base Case (2024) Existing traffic conditions;
- Future Base Case (2030) Adjusted future base case for the predicted traffic conditions in 2030; and
- Future Project Case (2030) Adjusted future base case for the predicted traffic conditions in 2030, including the Indicative Reference Scheme at the expected year of opening.

The performance of the key surrounding intersections was modelled against each scenario with the Degree of Saturation (DOS), Average Vehicle Delay (AVD) and Level of Service (LoS) outlined in **Table 16** below.

		Scenario 1			Scenario 2			Scenario 3		
Intersection	Peak Period	Ba	se Case (202	24)	Future	e Base Case	(2030)	Future	Project Case	e (2030)
		DOS	AVD (s)	LoS	DOS	AVD (s)	LoS	DOS	AVD (s)	LoS
Cosgrove Road &	AM	0.86	20	В	0.89	28	В	0.90	29	С
Liverpool Road	PM	0.94	43	D	1.06	78	F	1.05	80	F
Cosgrove Road &	AM	0.72	20	В	0.78	21	В	0.79	22	В
Punchbowl Road	PM	0.69	21	В	0.75	22	В	0.75	23	В

Table 16 Traffic Assessment

The modelling results for the Future Project Case (2030) found both intersections would continue to operate at a similar LoS, with the LoS at the intersection of Cosgrove Road and Liverpool Road during AM peak worsening from B to C. This change in LoS is due to a 1 second increase in delay, and the change is considered acceptable. Therefore the proposed increase in trips would result in negligible increase of delay in each key intersection.

In both the Future Base Case (2030) and Future Project Case (2030), the intersection of Cosgrove Road and Liverpool Road during the network PM peak would experience significant capacity constraint, regardless of the development. As such, this Planning Proposal is not expected to have any material impact onto the surrounding road network.

7.3.3 Access and Circulation

The indicative access driveways along Cosgrove Road, Hope Street and Madeline Street, alongside access roads and warehouse hardstand areas on the Ground Level have been designed to accommodate up to a 26.0m B-Double. Level 1 and 2 of the Indicative Reference Scheme have been designed to accommodate vehicles up to a 20.0m Articulated Vehicle. For a preliminary swept path assessment, refer to Appendix A of the Transport Assessment (**Appendix G**).

7.4 Noise

A Noise Assessment Report has been prepared by Acor Consultants and is included at **Appendix H**. It assesses the noise impact of the Indicative Reference Scheme on nearby noise sensitive receivers and provides design recommendations to achieve relevant acoustic requirements as per the NSW EPA *Noise Policy for Industry 2017*.

The assessment identifies adjacent receivers, inclusive of the industrial receivers surrounding the Site and the residential receivers to the south-east. The location of the noise sensitive receivers is outlined in **Table 17** and illustrated in **Figure 36** following.

Receiver	Noise Sensitive Receiver	Туре	Direction from Site
RI	Northside Fine Food	Industrial	West
R2	Eurologic, Auto Friend, Lis-Con, First Choice Towing and other various commercial entities along Pilcher Street	Industrial	North
R3	Paper Trade, Aussie Skips, Pro-Axle Enfield and other various commercial entities along Madeline Street	Industrial	East
R4	Muirs Prestige Smash Repairs, Alsco Uniforms, Rainbow Floor Services	Industrial	South
R5	75-85 Madeline Street, Strathfield South	Residential	South-East

Table 17 Description of Noise Sensitive Receivers



Figure 36 Noise Sensitive Receivers

Source: Acor Consultants

To assess the current background noise environment, a noise logger was installed at the closest residential receiver to the Site. The existing noise environment at the Site is dominated by heavy traffic vehicle noise associated with the freight operations of the Enfield Intermodal Logistics Centre to the north-west of the Site, and mechanical/operational noise from industrial tenancies or associated light vehicles adjacent to the Site.

The building specifications and operations assessed were based on the Indicative Reference Scheme, which is noted as being conceptual and not inclusive of detailed warehouse design. The assessment was completed with the following project elements being known about the general site arrangements:

- 2 x 3 storey structures, housing 6 warehouses;
- Underground car parking;
- Hardstand areas accommodating 26 Heavy Good Vehicles (HGV), 10 docks along Warehouse Building 1 & 16 docks along Warehouse 2; and
- Roof area encompassing total structure and hardstand areas.

It is noted that the following elements were not known at the time of the assessment preparation but are assumed for assessment purposes of the assessment:

- Internal operational activity;
- Rooftop mechanical plant;
- Building envelope construction specifications;
- Hardstand area HGV dock concentration; and
- Ramp screen construction specifications.

The results of the operational noise assessment are detailed in Table 18 below.

Table 18 Predicted Operational Noise Assessment

Noise Sensitive Receiver	Туре	Predicted Noise Levels anytime (L _{Aeq,15min} dB(A))	Project Noise Trigger Level (L _{Aeq,15min} dB(A))	Compliance
Receiver 1				
Northside Fine Food (East Façade – Cosgrove Rd)	Industrial	56	68 – When in use	Yes
Northside Fine Food (South Façade – Turnout Drive)	Industrial	53	68 – When in use	Yes
Receiver 2			·	
Eurologic (South Façade)	Industrial	57	68 – When in use	Yes
Lis Con (South Façade)	Industrial	42	68 – When in use	Yes
First Choice Towing (South Façade)	Industrial	55	68 – When in use	Yes
Receiver 3				
Paper Trade (West Façade – Madeline St)	Industrial	52	68 – When in use	Yes
Aussie Skips (West Façade – Madeline St)	Industrial	56	68 – When in use	Yes
Pro-Axle Enfield (West Façade – Madeline St)	Industrial	49	68 – When in use	Yes
Receiver 4				
Alsco Uniforms (North Façade – Hope St)	Industrial	38	68 – When in use	Yes
Muirs Prestige Smash Repairs (North Façade – Hope St)	Industrial	37	68 – When in use	Yes
Receiver 5			·	
75 Madeline St (North Façade)	Residential	36	53 (day) 43 (evening/night)	Yes

Noise Sensitive Receiver	Туре	Predicted Noise Levels anytime (L _{Aeq,15min} dB(A))	Project Noise Trigger Level (L _{Aeq,15min} dB(A))	Compliance
			38 (night)	
75 Madeline St (West Façade)	Residential	35	53 (day) 43 (evening/night) 38 (night)	Yes
77 Madeline St (West Façade)	Residential	33	53 (day) 43 (evening/night) 38 (night)	Yes
110 Madeline Street (North Façade)	Residential	33	53 (day) 43 (evening/night) 38 (night)	Yes

The assessment demonstrates that the project noise trigger level (noise criteria) established in accordance with the *NSW EPA Noise Policy for Industry 2017* will be achieved at the nearest noise receivers.

7.5 Arboricultural

A Preliminary Arboricultural Impact Assessment has been prepared by Hugh the Arborist and is included at **Appendix I**. It assesses the existing trees on the Site and immediate surrounds, allocating retention values to assist with understanding the potential constraints posed by high value trees during the design process and assesses what trees are required to be removed as part of the Indicative Reference Scheme.

The assessment identifies that the Site and immediate surrounds currently comprises a total of 106 trees. It identifies that trees located in the public domain, particularly Hope Street and Madeline Street are significant and of high value. Generally these trees can be retained providing there are no level changes within the existing setbacks inside the Site and are not impacted by new driveways.

As illustrated on the Concept Landscape Plan (**Appendix E**), it is estimated that approximately 43 existing trees can be retained within the Site (excluding street trees).

7.6 Contamination

A Preliminary Site Investigation has been prepared by Douglas Partners and is included at **Appendix J**. It comprises a desktop review of environmental and historical information, coupled with a site walk to assess the suitability of the Site for redevelopment.

The potential sources of contamination identified were limited in scope, and include existing fill, degradation of hazardous building materials, presence of fuel storage systems, and industrial/commercial activities from previous and current Site uses and/or adjacent properties.

The following assessments are recommended prior to the redevelopment of the Site to confirm the contamination status:

- Undertake intrusive investigations involving characterisation of subsurface conditions including soil, groundwater and if required soil vapour sampling. The intrusive investigations will assist with evaluation of the potential sources of contamination and whether complete exposure pathways exist at the Site;
- A Hazardous Building Materials survey should be conducted by a qualified occupational hygienist prior to demolition of buildings proposed for demolition; and
- For off-site disposal purposes, a formal waste classification would be required for the soil to be disposed offsite.

Subject to undertaking demolition and site remediation, the Preliminary Site Investigation concludes that the Site can be made suitable for the future employment land use and development from a contamination perspective.

7.7 Flooding

A Flood Management Report has been prepared by Acor Consultants and is included at **Appendix K**. It assesses the potential impacts associated with the Indicative Reference Scheme located within the flood-affected land and assesses its compliance with Council's requirements.

The Site is identified as being located within the Cooks Rivers catchment area with the Cooks River and Cox Flood Study was obtained from Council. The Site is identified as being only partially inundated during the Probable Maximum Flood (PMF) event, and is not identified as affected during the 1% Annual Exceedance Probability (AEP) flood events.

The PMF Cooks River catchment rainfall event produces a maximum water level of RL 16 in the south-west corner and RL 13 in the south-east corner of the Site. It results in inundation of 0.30-0.50m on the Site. During the PMF event, the hydraulic hazard level remains low, and the southern corners of the Site become a part of the floodway with Cosgrove Street, Hope Street, and Madeline Street.

Council has an *Interim Flood Prone Land Policy* which mandates that all developments must be designed so that floor levels are above the external 1% AEP flood level. While the Site is not inundated during the 1% AEP flood event, setting the floor levels of the building to be above the 1% AEP should be undertaken. This results in a Flood Planning Level of the 1% AEP flood level equating to RL 13.00. This is lower than the existing levels on the Site which range from RL 14 to RL 14.60.

The lower ground level of the Indicative Reference Scheme adopts the Flood Planning Level. It is therefore concluded that the flood affectation is negligible in terms of flood storage, changes of flood levels, and velocities.

7.8 Service and Utilities

A Service Infrastructure Assessment has been prepared by LandPartners and is included at **Appendix L**. It assesses the additional demand generated by the Indicative Reference Scheme in relation to key services and utilities, including potable water, waste water, electricity telecommunications and gas.

The service and utilities assessment is summarised in **Table 19** below.

Service	Assessment
Potable Water	 The Site is bisected by a 2,400mm water supply system laid in a tunnel which comes from the Potts Hill distribution facility and is a critical Sydney Water asset. Given the existence of existing buildings on the Site, it would appear that the tunnel is deep and has not prevented development of the Site. However, Sydney Water will need to be consulted for Building Plan Approval assessment depending on depth of the tunnel. A 250mm trunk water main is laid in Madeline Street. This main is not available for connection. A
	 A 250mm trunk water main is laid in Madeline Street. This main is not available for connection. A 150mm reticulation main is laid in Hope Street and along part of the frontage of the Site to Cosgrove Road. This main is available for connection. A feasibility application (CN216635) has been lodged with Sydney Water. Discussions with Sydney Water noted that due to a large volume of projects various stakeholders in Sydney Water had not yet been able to review the feasibility application.
Waste Water	 A 225mm reticulation sewer exists within the site and due to the location of the proposed building footprints this main is likely to be disused and assets recovered. A 225mm sewer is laid in Madeleine Street and is available for connection. Connection to the existing 225mm main in Madeleine Street will be required and this main has adequate capacity to serve the Indicative Reference Scheme.
Electricity	 There are four (4) padmount substations located within the site and these padmount substations will need to be disconnected and recovered from the Site. The development would be serviced by the installation of a new padmount substation to supply the expected demand of 1MVa and another padmount substation to supply the surrounding electrical network and street lighting systems. Applications for Technical Review Requests have been lodged with Ausgrid and their response is attached in Appendix B of the Service Infrastructure Assessment (Appendix L).
Telecommunications	• Existing internal telecommunications assets currently servicing the existing development on the Site will be terminated and removed. New telecommunications facilities will be provided as part of

Service	Assessment
	the proposed development by an authorised telco provider with existing infrastructure along Madeleine Street and Cosgrove Road.
Gas	 Jemena has a 1,050kPa gas main in Cosgrove Road and a low pressure main (7kPa) in Madeleine Street.
	 It is unlikely that connection to the gas reticulation system would be required.

Source: LandPartners

It is therefore determined that the Site can be suitably serviced to support the Indicative Reference Scheme and will be subject to a detailed service and utility assessment as part of a future detailed Development Application.

7.9 Social and Economic

A Social and Economic Impact Assessment has been prepared by HillPDA and is included at **Appendix M**. It comprises an assessment of the social and economic impacts of this Planning Proposal, having regard to the *Social Impact Assessment Guideline* (Department of Planning Housing and Infrastructure, 2023). It also includes mitigation measures that aim to maximise socio-economic benefits and minimise negative impacts to the community.

7.9.1 Social Impact

The social impact assessment was based on the Indicative Reference Scheme and takes into account the existing context. It is noted that given the assessment is based on the Indicative Reference Scheme, it may not be representative of the future development which would be assessed in detail at the detailed Development Application stage.

During Construction

The construction process has the potential to affect the amenity of sensitive receivers within the surrounding area, with the following potentially affecting the local amenity:

- The removal of established vegetation;
- The introduction of construction facilities to the environment;
- Noise and dust arising from construction activities;
- Unpleasant odours; and
- Increased traffic volumes and/or congestion.

The short term reduction to amenity may impact nearby residential properties, however distribution is likely to be minimised due to the distance to the residential receivers. In order to minimise the potential construction impacts on local amenity, a range of mechanisms can be applied at the detailed Development Application stage to minimise any potential construction impacts on amenity. The mechanisms would be implemented through a Construction Management Plan, addressing issues such as demolition and construction staging, noise, air and water quality, construction traffic management, pedestrian safety and site management.

During Operation

The operational impacts of the Indicative Reference Scheme have been assessed with a summary against the areas of influence provided in **Table 20** below.

Table 20 Social Impact Assessment of Operational Impacts

Matter	Assessment
Way of life	The benefits to way of life are most likely to flow from additional employment being located within an existing employment area, improving employment access for local residents and the broader community.
	The introduction of more jobs on the Site will increase the number of people accessing the Site, and therefore congestion on surrounding transport and street networks. A Traffic Impact Assessment will be required as part of any future DA for the Site to model any potential impacts on the surrounding road network and develop design mitigations to mitigate the traffic impacts. Similarly, noise and vibration from operation could potentially impact upon the amenity of

Matter	Assessment	
	surrounding properties, and as a result a Noise and Vibration Impact Assessment (NVIA) will be required as part of any future DA for the Site.	
Community	This Planning Proposal is unlikely to impact on neighbourhood identity, due to the existing industrial character of the area. The proposed changes to the planning controls applicable to the Site are unlikely to produce a noticeable social impact to the local community's character or sense of place.	
Access	The future development will be required to meet relevant design and planning guidelines, with a Traffic Impact Assessment being required as part of any future DA to ensure that these guidelines are adhered to. This would also contribute to minimising potential amenity impacts on surrounding properties, businesses and workers arising from road congestion.	
Culture	A future Development Application on the Site will require advice on potential cultural significance, both Aboriginal and non-Aboriginal, through the consultation of relevant databases and investigations carried out on the Site itself. Reporting would be required on a basis of significance, in order to mitigate any impacts to items of cultural significance.	
Health and wellbeing	Noting the Site's relative isolation from potentially sensitive land uses, this Planning Proposal is unlikely to produce a noticeable variation to the social environment. Potential health impacts such as dust and odours, noise and vibration, and traffic safety concerns will be appropriately assessed at a future Development Application stage, with mitigation measures provided as a condition of consent.	
	In regard to crime rate, it is considered unlikely that the proposal would result in increased crime rates in the area, and is instead expected to have a positive impact on crime and safety as a result of increased activation of the area. It is recommended that Crime Prevention Through Environmental Design (CPTED) principles are incorporated into the design at a future Development Application stage.	
Surroundings	The proposed changes increase the risk of potential negative impacts to adjacent developments from the increased bulk and scale. This risk is mitigated from the existing industrial context allowing the proposed development to match its surroundings, allowing the possible impacts to be mitigated through high quality exterior design and landscaping. Overshadowing would also need to be considered for any future Development Application, inclusive of detailed modelling to mitigate shadowing impacts to surrounding properties.	
	Potential impacts to surroundings during the construction stage could emerge. While these would be temporary in nature, they would be subject to a Construction Management Plan or similar which would be required to include mechanisms to minimise impacts.	
Livelihoods	This Planning Proposal stands to make a positive contribution to the livelihood of residents in the area by creating new employment opportunities closer to residents' homes. The creation of employment opportunities could aid in improving community cohesion and social capital in the area and help to support social cohesion.	
Decision making systems	It is noted that this Planning Proposal does not seek to alter the existing land use on the Site, therefore not resulting in a significant departure from the understood uses of the site. Nevertheless, this Planning Proposal will be placed on exhibition for public comment, providing an opportunity for ongoing input.	

In conclusion, this Planning Proposal represents minor adjustments to the existing characteristics and usage of the Site and surrounds, with the potential to yield social benefits to livelihoods by facilitating additional economic activity within the site. As such, it represents a net social positive impact.

7.9.2 Economic Impacts

The economic impacts from the construction and operation phases of the Indicative Reference Scheme are expected to result in significant benefits and are summarised as follows:

- \$230 Million net of GST for the Indicative Reference Scheme;
- **1,787 total job years** generated as a result of the construction phase, including 488 directly generated job years;
- **\$143.6 million** worth of construction worth remuneration, inclusive of \$38.7 million being in the remuneration of workers directly in the design and construction of the development;

- **\$271.9 million** gross value added (GVA) to the NSW gross regional product (GRP), \$67.0 million of which is from the design and construction of the development;
- **1,379 total job years** generated at the operation phase, inclusive of 467 direct jobs, 488 production induced jobs, and 464 consumption induced jobs. This represents 1,009 more direct and indirect jobs than the base case;
- **\$503 million** generated in output annually, with \$189.4 million directly generated as a result of the development, representing a total net increase of around \$368.0 million in generated and supported output over the base case;
- \$114 million remuneration at the operation stage, with \$39.2 million being direct remuneration of workers. This equates to a total net increase of around \$83.4 million in generated and supported wages over the base case; and
- **\$153 million** GVA to the NSW GRP, inclusive of \$51.2 million direct value, this represents a total net increase of around \$112.3 million in generated and supported GVA over the base case.

It is also expected that the Indicative Reference Scheme would result in other economic impacts including:

- The construction of a multi-level warehouse on the Site represents a significant property investment decision, which may stimulate and attract further investment. This may raise the profile of the established Strathfield South/ Enfield industrial precinct and act as a catalyst for other similar developments in the area.
- The construction of a new modern warehouse facility will offer benefits such as enhanced operational efficiency and improved inventory management. New facilities are typically more environmentally sustainable, leading to long term cost savings and reduced environmental impact. Moreover, the facility leverages its proximity to the Enfield Intermodal Logistics Centre, with the proposed warehouse maximising logistical efficiencies, and significantly reducing transportation costs and delivery times.
- The provision of additional jobs brings benefits such as meeting LGA job targets and boosting the local economy. It also increases employment opportunities, helping to reduce local unemployment rates, enhance household incomes, and improve the overall standard of living within the community. New jobs may attract skilled workers to the area, fostering a more diverse and dynamic workforce. Additionally, meeting LGA job targets supports regional economic plans and strategic goals, ensuring sustainable growth and development.

Compared to the existing development on the Site, the Indicative Reference Scheme would support a more intensified economic outcome for the Site. The net increase in economic activity generated and supported during the operation phase, when compared to the existing development is estimated as follows:

- **Employment:** A total net increase of around approximately 1,009 full-time equivalent jobs generated and supported, including 341 direct full-time equivalent jobs;
- **Output:** A total net increase of approximately \$368.0 million in generated and supported wage, including a \$138.6 million increase in direct economic output;
- **Remuneration:** A total net increase of approximately \$83.4 million in generated and supported wages, including a \$28.7 million increase in direct remuneration; and
- **Gross Value Add:** A total net increase of approximately \$112.3 million in generated and supported GVA, including a \$37.4 million increase in direct value add.

Based on the above, this Planning Proposal provides positive economic impacts, with minimal negative impacts identified and has strong economic merit.

7.10 Evidence of Acquisition Efforts for 65 Madeline Street (Lot 18 DP 9011)

The Applicant has made acquisition efforts in relation to 65 Madeline Street (Lot 18 DP 9011) adjoining the Site to the south-east. To date, the Applicant has made the following efforts:

- **28 February 2024** Letter sent to the property address inviting general discussion about the project and the potential to amalgamate. No response was received.
- 17 May 2024 An in-person meeting between one of the land owners and a representative from Cushman Wakefield (on Centuria's behalf) occurred to discuss a potential sale of the property. The land owner advised they had no intention in selling and was reluctant to provide any price expectations.
- 13 September 2024 An offer to purchase the property was provided to the registered address of the land owner on 13 September 2024 via registered post. The offer was in-line with a formal valuation prepared by CBRE, which was also included in the package issued to the land owners. At the time of writing no response has been received.

8.0 Conclusion

This Planning Proposal is submitted to Council on behalf of Centuria in support of amendments to the Strathfield LEP 2012 for land identified as 94-98 Cosgrove Road, Strathfield South. The purpose of this Planning Proposal is 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 for the Site.

The creation of a multi-level warehouse or distribution centre on the Site responds to structural changes to the industrial logistics sector with increased demand for business to be located in close proximity to consumers and trade gateways, supporting the growth of business. It leverages the size and strategic location of the Site to deliver crucial additional industrial logistics floor space to service the growing needs of the Greater Sydney Region. It will enable business growth, providing a facility that aligns with modern tenant requirements, maximises logistical efficiencies, and reduces transportation costs and delivery times for businesses.

Specifically, this Planning Proposal seeks to enable the future development of a multi-level warehouse or distribution centre on the Site through the following amendments to the Strathfield LEP 2012:

- Amend the Height of Buildings Map from 12m to 35m; and
- Amend the Floor Space Ratio Map from 1:1 to 1.6:1.

It also seeks to create a Site-Specific Development Control Plan (DCP) to provide clarity on the intended development outcome for the Site. It is noted that no physical works are proposed, with this Planning Proposal limited to the amendment of planning controls only.

This Planning Proposal is supported by an Indicative Reference Scheme which demonstrates that a suitable built form, urban design and landscape outcome can be achieved under the proposed planning controls. It comprises a three-level warehouse or distribution centre with a total GFA of 68,960m² and building height of 34.6m. It also includes associated infrastructure including heavy vehicle ramps and increased landscaping coverage.

This report demonstrates that this Planning Proposal is justified for the following reasons:

- It capitalises on the strategic merit of the Site, being a large single lot under single ownership within an established industrial precinct where the existing development nearing the end of its lifecycle;
- It promotes the efficient and orderly use of strategically important land by enabling the highest and best use of the Site;
- It leverages the Site's proximity to Enfield Intermodal Logistics Centre and Sydney's key trade gateways of Port Botany and Sydney Airport to maximise logistical efficiencies and significantly reduce transportation costs for businesses and delivery times to consumers;
- It responds to current demand and changing dynamics in the industrial sector, contributing to the fulfilment of the shortfall in industrial logistics floor space in close proximity to trade gateways and consumers to support the growth of business in the Eastern City District;
- It will act as a catalyst for further investment in the locality, supporting the long-term potential, objectives and economic output of employment lands within the Strathfield LGA and Greater Sydney Region more broadly;
- It aligns with the needs of modern tenant requirements enabling improved efficiency in storage and operations, integration of advanced technologies, flexibility and scalability, improved cost-effectiveness and sustainability;
- It manages land use conflict by being located within an established industrial precinct, managing environmental impacts to nearby sensitive land uses to support the protection of industrial land within the existing industrial precinct and prevents the fragmentation of a large single lot, to increase the capacity of employment land;
- It will reinforce and increase the competitiveness of the established Enfield/Strathfield South industrial precinct by increasing the capacity of the industrial lands surroundings the Enfield Intermodal Logistics Centre to deliver high-quality facilities and higher economic output;
- It is consistent with the strategic planning framework, contributing to the achievement of employment targets and a number of the objectives and actions outlined within State, regional and local strategic plans;
- It is consistent with the objects of the EP&A Act in that it promotes the orderly and economic use and development of land;
- It is consistent with the applicable State Environmental Planning Policies and Ministerial Directions;

- It is consistent with the objectives of the E4 General Industrial zone under the Strathfield LEP 2012, supporting the efficient and viable use of land for industrial uses, minimising any adverse effect of industry on other land uses, and encouraging employment opportunities;
- It demonstrates a built form outcome that manages the inherit bulk and scale of higher density industrial uses to maintain and increase amenity in the surrounding area;
- It increases the tree canopy coverage on the Site, supporting increased amenity to the surrounding area and reduce the urban heat island effects in the local area;
- It results in a negligible impact on the surrounding road network;
- It demonstrates that noise generated will comply with the noise criteria, not impacting surrounding uses;
- It supports job creation in proximity to workers and economic growth in the local area and broader Greater Sydney Region through the following key significant economic benefits:
 - During construction:
 - \circ $\,$ 1,787 total job-years including 478 direct full-time equivalent job-years; and
 - \$676 million in total gross output, including \$230 million in direct gross output.
 - During operation:
 - 1,379 total ongoing full-time equivalent jobs including 467 direct full-time equivalent jobs; and
 - \$503 million in total economic output annually, including \$189 million in direct economic output.
- It will support significant public benefit through the creation of a significant amount of additional jobs in the local area, and contributing to the improved efficiency and capacity of the logistical supply chain, transporting goods to consumers quicker.

For these reasons, we have no hesitation in recommending that this Planning Proposal has both strategic and site-specific merit that warrants it to be progressed for Gateway Determination.