



10 June 2025

2230876

Kiersten Fishburn
Secretary
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Ms Fishburn,

Rezoning Review Request – Planning Proposal (PP2024.2)
94-98 Cosgrove Road, Strathfield South

We write on behalf of Centuria Capital Limited ('Centuria' or 'the Applicant') to request a Rezoning Review for a Planning Proposal (PP2024.2) lodged with Strathfield Council (Council) relating to land identified as 94-98 Cosgrove Road, Strathfield South (the Site).

The Site represents a large single lot, comprising an area of 43,100m², situated within an established industrial precinct located to the immediate east of the Enfield Intermodal Logistics Centre. The existing development is nearing the end of its lifecycle, comprising aging industrial assets constructed approximately four (4) decades ago. Considering the strategic value and location of the Site, a higher density of industrial development represents the highest and best use for the Site, not currently supported by the existing planning controls.

Centuria is a commercial property investment manager, managing high-quality 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. It has owned the Site since 2013 and recognise the significant opportunity at present to renew the Site for the highest and best use, representing a flagship multi-level warehouse future proofing the Site for decades to come.

Multi-level warehouses are necessary to service population growth within the Greater Sydney Region, particularly the increased density in in-fill areas. The development type, typically seen in land-constrained markets such as Hong Kong and Tokyo, are a recent trend as a result of population growth and key trends and structural changes to the industrial logistics sector, including:

1. Limited land availability and high land value in prime locations;
2. Continued growth and demand for e-commerce;
3. Expectation from consumers for reduced delivery timeframes; and
4. Demand for businesses to reduce transportation costs.

These are key trends and structural changes being experienced currently within the logistics sector, which are expected to continue over the coming decades. It is also highlighted that the NSW Government currently has a fundamental objective to increase housing density in response to the current housing crisis, expected to result in significant population growth in in-fills areas.

The number of sites within in-fill industrial areas that can support multi-level warehouses is very limited due to the fundamental requirement for large unconstrained sites. It is therefore crucial that large and unconstrained industrial sites, with strategic and site-specific merit, facilitate the highest and best use to support the growth of the Greater Sydney Region.

The Planning Proposal, as submitted to Council, seeks to enable the future development of multi-level warehouse or distribution centre on the Site through the following amendments to the *Strathfield Local Environmental Plan 2012* (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.

The Planning Proposal is supported by an Indicative Reference Scheme for a three-level warehouse or distribution centre with a total Gross Floor Area (GFA) of 68,960m². It aligns with the forecast demand for logistics floorspace in the location and tenant expectations in relation to design. It demonstrates a suitable built form, urban design and landscape outcome can be achieved under the proposed planning controls.

On 29 April 2025, Council resolved to not progress the Planning Proposal and formally notify the Applicant of non-support. The reasons detailed in the Council report centre around visual impact, specifically to the residential area located to the south-east and east of the Site. A summary of the matters raised in the Council report and the Applicant's response is provided in **Section 5.0**. It demonstrates the matters raised by Council are unjustified, and the Planning Proposal demonstrates strategic and site-specific merit.

This Rezoning Review has been prepared with regard to the *Local Environmental Plan Making Guideline* (LEP Making Guideline) (DPE, 2023), and is supported by the following:

- A copy of the Applicant's current Planning Proposal submission, as reported to Council (**Attachment A**);
- A copy of Council's Request for Further Information dated 20 December 2024, and the Applicant's response dated 11 February 2025 (**Attachment B**);
- A copy of Council staff Advice and Peer Review provided on 27 February 2025 (**Attachment C**);
- A copy of the Council report in relation to the ordinary Strathfield Local Planning Panel meeting on 10 April 2025 (**Attachment D**); and
- A copy of the Agenda, Minutes and Correspondence in relation to the ordinary Strathfield Council meeting on 29 April 2025 (**Attachment E**).

The following sections provide a summary of the relevant background, information, and justification.

1.0 The Site

The Planning Proposal (**Attachment A1**) provides a detailed description of the Site and surrounding context in. A summary is presented in **Table 1** below, and the Site Aerial Map provided in **Figure 1** on the following page.

Table 1 Summary of Site Characteristics

Characteristic	Description
Address	94-98 Cosgrove Road, Strathfield South
Legal Description	Lot 100 DP 862635
Site Area	43,100m ²
Local Government Area	Strathfield
Zoning	E4 General Industrial
Development Standards	The Strathfield LEP 2012 stipulates the following controls for the Site: <ul style="list-style-type: none">• Building Height – 12m• Floor Space Ratio – 1:1
Existing Development	Currently utilised by a freight and logistics company, as well as a retail shopfitting manufacturer. It includes eight (8) vehicular crossovers, with four (4) along Cosgrove Road, two (2) along Hope Street, and two (2) along Madeline Street.
Topography	Relatively flat with an approximate 5.5m fall from the north-west to the south-west.
Frontages	<ul style="list-style-type: none">• Cosgrove Road (West) – 200m• Madeline Street (East) – 185m• Hope Street (South) – 165m• Multiple small lots (North) – 235m• 65 Madeline Street (Lot 18 DP 9011) – 55m
Vehicle Access	The existing road network surrounding the Site is inclusive of a mix of state, regional and local roads. 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) 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 such, heavy vehicles accessing the Site can use any of the approved routes.

Surrounding Context

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 south-east and east. In summary, the surrounding context is described as follows:

- **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.
- **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. 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.
- **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.
- **West** – To the immediate west of the Site is the Enfield Intermodal Logistics Centre, which includes 60 hectares of land comprising an intermodal terminal, container storage and industrial lots for logistics freight forwarding, packing and unpacking and transport and warehousing. It provides rail connections to key trade gateways including Port Botany through dedicated freight-only rail lines.



Figure 1 Site Aerial Map

Source: Nearmap, edits by Ethos Urban

2.0 Background

2.1 Planning Proposal History

The chronological history of the Planning Proposal to date is summarised in **Table 2** below.

Table 2 Planning Proposal History

Date	Milestone	Description
12 March 2024	Scoping Report Submission	A Scoping Report was submitted for Council's consideration.
23 April 2024	Scoping Meeting	A Scoping Meeting was held between Council and the Applicant.
18 November 2024	Planning Proposal Lodgement	The Planning Proposal was formally lodged with Council.
20 December 2024	Council RFI	Council issued a Request for Further Information.
11 February 2025	Applicant Response	The Applicant submitted a response to Council's Request for Further Information.
27 February 2025	Council Advise Non-Support	Council informally advised following a commissioned peer review that it cannot support the Planning Proposal in its current form.
10 March 2025	Applicant Response	The Applicant advises Council it does not seek to revise the Planning Proposal to align with Council advice.
10 April 2025	Local Planning Panel Meeting	The Strathfield Local Planning Panel considered the Planning Proposal and resolved to support Council staff's assessment.
29 April 2025	Council Meeting	Council resolved to not progress the Planning Proposal and formally notify the Applicant of non-support.

2.2 Logistics Market Context

In response to population growth, increased density and other key drivers, multi-level warehouses have emerged as a development type within the Greater Sydney Region. Typically isolated to land-constrained markets such as Hong Kong and Tokyo, these facilities are required to facilitate the necessary industrial floor space to service dense populations. The other key drivers supporting the emergency of multi-level warehouses include:

- **Limited land availability and high land value in prime locations** – Significant land constraints have emerged in the Sydney logistics market as a result of a shortage of serviced industrial land, and unconstrained sites in in-fill areas. This has resulted in historically low industrial vacancy rates across in Sydney, dropping as low as 0.2% in H1 of 2023 and most recently sitting at 2.5% (H2 2024), having been 6.3% in H2 2019. 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 high. The increase in rents, as well as land value, has supported the development of multi-level warehouses and their associated high costs of construction.
- **Continued growth and demand for e-commerce** – The digital transition of retail and commerce, accelerated by the Covid-19 pandemic, represents a multi-decade mega-trend requiring a large volume of facilities to support storage and distribution. This has resulted in sustained growth in demand from businesses for high-quality, well-located logistics facilities in proximity to consumers.
- **Expectation from consumers for reduced delivery timeframes** – The e-commerce sector is becoming increasingly competitive with more businesses seeking to meet the growing expectation from consumers for 'same-day' or 'next-day' delivery. Competitive businesses are therefore seeking to locate in close proximity to trade gateways and consumers, increasing the demand for logistics floor space within in-fill areas.
- **Demand for businesses to reduce transportation costs** – Transportation costs represent a significant portion of total costs for logistics operations. The location of distribution facilities is therefore crucial for operators to reduce total transportation costs.

Currently, there are over twenty-three (23) multi-level warehouse projects in the planning system, approved/under construction and completed 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 near dense populations and Sydney's key trade gateways of Port Botany and Sydney Airport. The context of multi-level warehouses within the Greater Sydney Region is illustrated in **Figure 2** on the following page.



Figure 2 Sydney Multi-Level Warehouse Development Context Map

Source: Nearmap, Ethos Urban

3.0 Planning Proposal

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.

The Planning Proposal is also supported by a draft Site-Specific DCP (**Attachment A5**) to provide clarity on the intended development outcome for the Site.

The Applicant engaged Ethos Urban to undertake early community engagement activities, including the distribution of a Community Notification Letter (**Attachment A15**), a community hotline and email address, and the opportunity for one-to-one or group stakeholder meetings. No enquiries or feedback were received, leading the project team to decide to not undertake any further engagement activities until a later date.

For further information, refer to the Planning Proposal (**Attachment A1**) which provides a detailed description of the proposed amendments and supporting information.

4.0 Indicative Reference Scheme

The Indicative Reference Scheme represents a three-level warehouse or distribution centre that demonstrates a conceptual future outcome of the Site under the proposed amendments to the Strathfield LEP 2012. It is emphasised that it is only conceptual, and will be subject to a detailed design process to align with Centuria's intention to create a flagship asset within the Centuria Industrial Real Estate Investment Trust.

The Indicative Reference Scheme is depicted within the Concept Design Report prepared by Nettletontribe Architects included at **Attachment A2**. A summary of the key components is provided in **Table 3** below.

Table 3 Key Information – Indicative Reference Scheme

Component	Description	
Site Area	43,100m ²	
Land Uses	Warehouse or distribution centre, including ancillary Office premises uses	
Gross Floor Area	Warehouse GFA	62,360m ²
	Office GFA	6,600m ²
	Total	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	4,171m ² (9.7%)	
Construction Jobs	478 direct full-time equivalent job-years	
Operational Jobs	467 direct full-time equivalent jobs	

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 sensitive 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. It is identified as containing six (6) warehouse tenancies. The layout of car parking across the Site, has been positioned in order to ensure an adequate provision adjacent to each ancillary office core.

The Indicative Reference Scheme is depicted on the Ground Level Plan, illustration, and perspective provided in **Figure 3** and **Figure 4** respectively.

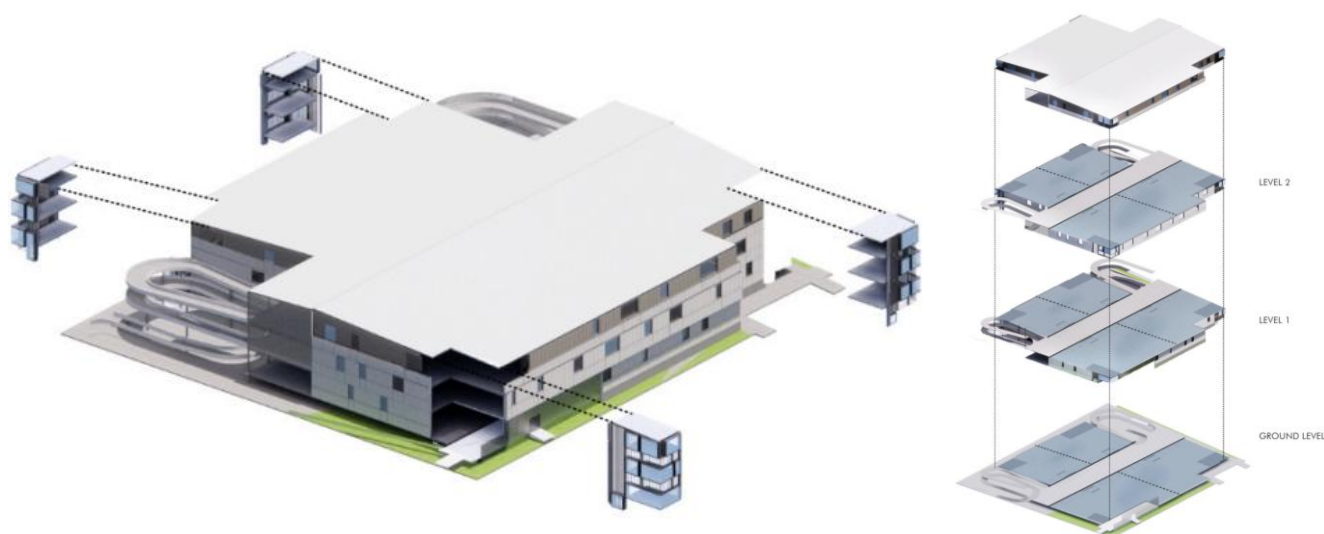


Figure 3 Axonometric Built Form Illustration of the Indicative Reference Scheme

Source: Nettletontribe Architects



Figure 4 Perspective Render of the Indicative Reference Scheme – Corner of Cosgrove Rd and Hope St

Source: Nettletontribe Architects

5.0 Rezoning Review Request

At the Ordinary Council Meeting of 29 April 2025, Council resolved to not progress the Planning Proposal and formally notify the Applicant of non-support. The reasons detailed in the Council report (**Attachment D** and **E1**) centre around visual impact, specifically to the residential area located to the south-east and east of the Site.

A summary of the matters raised in the Council report and the Applicant's response is provided in **Table 4**. It demonstrates the matters raised by Council are unjustified, and the Planning Proposal demonstrates strategic and site-specific merit.

In accordance with the LEP Making Guideline, this Rezoning Review Request is submitted on the basis that Council has resolved to not support the Planning Proposal to proceed to Gateway Determination. As outlined in **Section 6.0** and **7.0**, the Planning Proposal demonstrates both strategic and site-specific merit.

On the basis of the above, we respectfully request that the Planning Proposal be forwarded to the Sydney Eastern City Regional Planning Panel for consideration with regards to the merits of the Planning Proposal to proceed to Gateway Determination.

Table 4 Response to Issue Raised in Strathfield Council Report – 29 April 2025

Issue Raised by Council	Response
Height and Density	
<ul style="list-style-type: none">• “A 35m high building, which would be comparable in height to a 10-storey residential flat building, and with no transition in height, would have a significant visual impact for the low-density residential areas to the south (maximum height of 9.5m), as well as open space areas located along Cox’s Creek and the Cookes River.”• “The proposal’s longitudinal (east-west) dimension is 208.1m, would result in a very large southern façade orientated towards residential areas and public open spaces. Noting the need for large floor plates and stacking heights, physical articulation (via through breaks in the building and/or separation of the building and upper-level setbacks) would be difficult to achieve. When combined with the proposed height, any future building on this site, which will have long and expansive facades, will be significantly intrusive, particularly when viewed from the residential and open space areas.”• “Noting the need for large floor plates and stacking heights, physical articulation (via through breaks in the building and/or separation of the building and upper level setbacks) will have a limited effect on mitigating bulk and scale.”	<p>The Site is situated within an established industrial precinct, immediately surrounded by other industrial uses. It is clearly separated from the residential area to the east and south-east by Cox Creek, existing mature vegetation and sports fields.</p> <p>Multi-level warehouses are required to support population growth and increased density within the Greater Sydney Region, and in response to key trends and structural changes in the industrial logistics sector. A future shortfall in in-fill logistics floorspace will result in significantly increased rents, which does not support business growth and costs are ultimately passed onto the consumer. It is therefore critical that key in-fill industrial precincts and unconstrained site’s support increased density.</p> <p>The delivery of increased housing density has been identified as a key objective by the current NSW Government in response to the current housing crisis. The Planning Proposal will enable the delivery of additional logistics floorspace within an established industrial precinct to support further population growth and additional density.</p> <p>The Planning Proposal demonstrates the strategic value of the Site and identifies it will not result in unacceptable environmental impacts. It is acknowledged increased density inherently results in a degree of visual impact because of associated bulk and scale, but the Planning Proposal demonstrates future development will not result in unacceptable visual impacts to surrounding sensitive receivers.</p> <p>The Visual Impact Assessment (VIA) (Attachment A7) is based on viewpoints requested by Council identified in the scoping meeting advice, as well as four (4) additional viewpoints selected by the Applicant. It concludes the Planning Proposal will not have a significant visual impact, with the exception of two (2) viewpoints located in proximity of each other within Madeline Street. Any future development on the Site would incorporate ancillary office space at key points to reduce bulk and scale. Suitable articulation and architectural elements can be incorporated during the detailed design phase prior to a Development Application.</p> <p>The subject residential area is currently bordered by 8-storey residential development along Punchbowl Road. The density along Punchbowl Road is expected to extend further into the residential area with 72-88 Water Street, Strathfield South (approximately 600m south-east of the Site) accepted into the Housing Delivery Authority (HDA) pathway (SSD-85617958). The associated Scoping Report (Architectus, 5 June 2025) outlines the proposed development will comprise a 9-storey residential flat building directly adjacent to single-detached dwellings. The</p>

Planning Proposal is therefore of a comparable height to residential development surrounding the subject area.

Based on the above, taking into consideration the strategic and site-specific merit, the proposed height and density will not have an unacceptable impact on surrounding sensitive receivers.

- *“a maximum 25m height would be more appropriate in this location. This would allow for more appropriate height transition between the site and residential areas to the south and would result in a building that was less visually intrusive and closer in height to a mature canopy tree.”*

The existing development is nearing the end of its lifecycle, comprising aging industrial assets. Taking this, as well as the strategic value of the Site into consideration, it is critical that the renewal of the Site aligns with the highest and best use. Centuria recognises this significant opportunity at present to renew the Site for the highest and best use, representing a flagship three-level warehouse that will future proof the Site for decades to come.

The amendment of the Planning Proposal to align with a two-level warehouse or distribution centre would fail to capture the highest and best use and would reduce the expected lifespan of the development. Further, given the high associated construction costs for multi-level warehouses, it is important that capital investment is maximised.

Visual Impact Assessment

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

As aforementioned, the VIA (**Attachment A7**) concludes the Planning Proposal will not have a significant visual impact, with exception of two (2) viewpoints located in proximity of each other within Madeline Street.

A judgement of the visual impact cannot be made on a single static view. It is expected the visibility of the built form will be largely constrained to road users, with limited visibility from the footpath and private land due to mature landscape screening and properties being located perpendicular to the street.

Any future development on the Site would incorporate ancillary office space at key points to reduce bulk and scale. Suitable articulation and architectural elements can be incorporated during the detailed design phase prior to a Development Application.

It is noted there are comparable examples of multi-level warehouses adjacent to residential areas, which includes effective visual mitigation. The 45-57 Moxon Road Multi-Level Warehouse (approved on 19 July 2024) is located on the perimeter of an industrial area adjoining a low-density residential area. It demonstrates a comparable visual impact to immediate sensitive receivers, as well as sensitive receivers that previously had no or limited visibility to the industrial area.



Illustration of 45-57 Moxon Road Multi-Level Warehouse and surrounding context



Viewpoint 5 – View from directly adjacent residential area

- In relation to Viewpoints 5 and 9, *"the images show small portions of a building that will have a 200m long southern façade and similar length along the eastern façade. The viewpoints show a narrow view window that indicates the visual impact of the building will be mitigated by trees and buildings in the foreground. This is considered to underplay the presence of the building in the local environment, which currently features a 12-15m height plane across industrial areas and 9.5m (at the highest) plane across residential areas."*
- *"Viewpoints 9 and viewpoint 4 are also considered in isolation from the wider residential area south of the site. Discussion of these limited viewpoints underplays the impact of the building on numerous residential streets and dwellings located along Chisolm Street, Blanche Street, Birriwa Avenue, Chatfield Avenue and potentially further afield on Water Street."*

The Applicant specifically adopted Council's requested viewpoint locations to comply with Council's scoping meeting advice. The Applicant also elected to include four (4) additional viewpoints, being Viewpoint 9-12 of the VIA (**Attachment A7**). The viewpoint locations identified by Council demonstrate the Planning Proposal will result in a minor or minor/negligible impact to the vast majority of locations.



Council Requested Viewpoint Locations

- *"In relation to Viewpoints 4 and 9, the VIA proposes a medium sensitivity based on a criteria that places limited value on the existing scenic context which incorporates canopy trees that screen most industrial buildings. The leafy outlook for residents and travellers along the local road network contributes to a higher sensitivity than is attributed in the VIA."*
- *"The outcome generated by this Planning Proposal would result in a new focal point for residents south of the site, with direct and close range views of a building more than twice the height of existing industrial buildings across a large horizontal extent. Therefore, the magnitude of change is expected to be high or very high."*
- *"As part of the pre-scoping response letter, Council provided suggested viewpoints, which have been addressed in the submitted VIA. However, several of the suggested viewpoints have been used to demonstrate low visual impacts due to localised view obstructions. For example, Viewpoint 6 has been given a minor/negligible impact due to a crop of mature trees directly opposite this viewpoint. However, numerous dwellings south of this point along Chisolm Street look across from Cooke Park, where the new development would introduce a large structure well above the background canopy line.."*
- *"The sensitivity applied to open space areas (in Viewpoints 3 and 5) underplays the scenic value of users of these spaces. The local open*

It is acknowledged the visual receptor sensitivity for Viewpoints 4 and 9 are more aligned to 'high', as opposed to 'medium'. This would result in the significance of visual impact being upgraded to 'high/moderate' (Viewpoint 4) and 'high' (Viewpoint 9).

A judgement of the visual impact cannot be made on a single static view. It is expected the visibility of the built form will be largely constrained to road users, with limited visibility from the footpath and private land due to mature landscape screening and properties being located perpendicular to the street.

The Planning Proposal will not result in the creation of a new focal point from the residential area to the east and south-east. It will represent a new feature within the landscape to some locations within the subject residential area.

As previously discussed, multi-level warehouses are required to support population growth and increased density within the Greater Sydney Region, and in response to key trends and structural changes in the industrial logistics sector.

The visual impacts identified to be significant (moderate or above) are limited to the public domain within Madeline Street, which comprises a direct view-line to the Site where the associated dwellings are perpendicular.

As aforementioned, the Applicant adopted Council's requested viewpoint locations to comply with Council's scoping meeting advice. The Applicant also elected to include four (4) additional viewpoints, being Viewpoint 9-12 of the VIA (**Attachment A7**). The viewpoint locations identified by Council demonstrate the Planning Proposal will result in a minor or minor/negligible impact to the vast majority of locations.

As identified in the VIA (**Attachment A7**), the open space areas comprise sports fields and associated infrastructure. Therefore, the open space areas are primarily for the purposes of sports and activities,

<p><i>spaces provide green space outside of organised sport and all users have the potential to enjoy these spaces in the current visual setting where buildings are mostly screened by the tree canopy line. In considering the magnitude of change, the VIA presents narrow viewpoints that focus on areas of canopy trees in the foreground. In reality, the building will be a significant new focal point from these spaces where there are numerous unobstructed views of the site or views from the other side of Cooke Park and various other points in Begnell Field."</i></p>	<p>where an appreciation of the landscape has little or no importance. The subject open space areas cannot be subsequently assigned closely with 'scenic values'. The assigned 'low' (Begnell Field) and 'medium' (Cooke Park) visual receptor sensitivity is therefore justified.</p> <p>The Planning Proposal will not result in the creation of a new focal point. The existing mature tree canopy will provide appropriate visual separation and suitable foreground for the built form.</p> <p>It is acknowledged that higher density development cannot rely entirely on landscape screening and must also rely on articulation and architectural treatment to minimise bulk and scale. This is true of any type of development and not isolated to industrial development. The Site-Specific Development Control Plan (DCP) (Attachment A5) establishes key mitigation measures. As identified above, there are current examples that demonstrate suitable</p>
<ul style="list-style-type: none"> • <i>"Audax Urban also questioned the methodology used by Geoscapes, noting that no proof of the veracity of the montages has been provided, and, at best, these can be described as artist's renditions and their accuracy cannot be ascertained as they are not court certifiable montages. This brings into question all other viewpoints, including those on the northern side of the Cooks River, where there may be other topographical high points that present greater visual impacts than the discussion orientated around Viewpoint 7."</i> 	<p>As outlined in Section 2.4 of the VIA (Attachment A7), camera positions of photographs taken from the selected viewpoints were added to the model from the recorded GPS data. Known reference points obtained from survey information and point cloud data (ELVIS) were positioned into the view and these were then combined with the site photographs to create the simulated photomontages of the Indicative Reference Scheme.</p> <p>On request, material and further information confirming the veracity of the VIA can be provided.</p>
Façade Design and Setbacks	
<ul style="list-style-type: none"> • <i>"the setbacks and landscaping within those setbacks would not have a mitigating effect on a 35m high building considering the visual impacts are primarily from areas outside of the adjoining local road network."</i> 	<p>It is acknowledged that higher density development cannot rely entirely on landscape screening and must also rely on articulation and architectural treatment to minimise bulk and scale. This is true of any type of development and not isolated to industrial development.</p> <p>The Site-Specific DCP (Attachment A5) establishes key mitigation measures, including suitable setbacks and the following requirements:</p> <ul style="list-style-type: none"> • Ancillary office space should be positioned to minimise bulk and scale, having regard to the nearby residential areas; • Development should include artistic elements on the eastern and southern elevations • Development should be of high aesthetic quality in relation to its materiality, architectural composition and detail; and • Vehicle ramps should be located to minimise visual and acoustic impact to nearby residential areas.
<ul style="list-style-type: none"> • <i>"Façade treatments would not be able to modulate the building to a point where it would not be a new visual focal point for surrounding residential and open space areas and the ability to create significant breaks in the façade and step the development is limited by the nature of the land use."</i> • <i>"Audax Urban also questioned the VIA's use of architectural treatments to downplay visual impacts from certain viewpoints. Architectural treatments at the Planning Proposal stage are a variable that should not be used to reduce visual impacts in the discussion of impacts from a general building envelope. Notwithstanding, articulation of the built form as presented has limited impact to a building of this scale when combined with the need for regular floor plates."</i> 	<p>The Planning Proposal will not result in the creation of a new focal point, rather a new element within the landscape. A judgement of the Planning Proposal cannot be made on a single static view within the subject residential area.</p> <p>It is acknowledged that the use of architectural treatments only cannot be relied upon during the consideration of a Planning Proposal. However, the potential for architectural treatments to mitigate the bulk and scale within an envelope are an important consideration.</p> <p>The future development under the proposed planning controls can deliver a suitable built form encompassing strong horizontal and vertical articulation. The Site-Specific DCP (Attachment A5) has incorporated suitable provisions to support this outcome. An example of effective horizontal and vertical articulation (directly adjacent to a sensitive receiver) in the approved multi-level warehouse at 270 Horsley Road Milperra (provided below).</p> <p>Further, it is reiterated the Indicative Reference Scheme would not be viewable from a large portion of the subject residential area. It is also</p>

noted that the surrounding open space is mainly used for the purposes of sports or activities and is not primarily for the purposes of amenity.



270 Horsley Road Multi-Level Warehouse (SSD-51147710) (SBA Architects)

Landscaping, Deep Soil and Canopy Cover

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

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

There is currently very limited tree canopy coverage within the site boundary, consistent with the surrounding industrial context. It is proposed that the Site-Specific DCP (**Attachment A5**) comprise a tree canopy coverage requirement of 10%.

As acknowledged by Council, this will result in a notable increase in tree canopy coverage. The quoted canopy coverage targets are not statutory requirements, and the renewal of the Site will adequately contribute towards aspirations targets.

The proposed setbacks along Cosgrove Road and Hope Street are greater than 6m and will support the planting of large canopy trees, screening the development to the adjacent public domain and immediate surroundings. It is acknowledged that higher density development cannot rely entirely on landscape screening and must also rely on articulation and architectural treatment to minimise bulk and scale.

Strategic Merit

- “the Planning Proposal will facilitate a development that would create a new local visual landmark and due to its prominence, detract from the local character. The future building would sit well above the tree canopy line which defines views from surrounding residential and open space areas.
Due to the nature of the development, opportunities to mitigate bulk and scale through high quality urban design are limited. With these site-specific impacts and limitations in mind, the Planning Proposal is inconsistent with place based objectives and Planning Principles in the Region and District Plans.”

The Planning Proposal would enable the creation of a new element within the landscape, not the creation of a new focal point.

The surrounding mature tree canopy will provide adequate visual separation and partial screen of the built form. It is acknowledged that higher density development cannot rely entirely on landscape screening and must also rely on articulation and architectural treatment to minimise bulk and scale. As aforementioned, there is adequate opportunity for incorporation of articulation and architectural elements to reduce bulk and scale through the detailed design phase.

It would therefore satisfy the place-based objectives of the Region and District Plans, supporting significant renewal of the Site that will act as a catalyst for the industrial precinct.

- “Under P10, the LSPS establishes that development and renewal of industrial and commercial areas must support the LGA’s attraction as a desirable place to live and work. In this regard, the Planning Proposal is inconsistent with the LSPS, as the proposed height would have a negative effect on local character and amenity for the Strathfield South residential area.”

The proposed height does not automatically result in an unacceptable impact on local amenity and character. The Site is located within an established industrial precinct, separate from the residential area located to the east and south-east. As demonstrated above, suitable measures can be incorporated into the detailed design to minimise the bulk and scale of the built form. It would result in a significant increase in tree canopy coverage on the Site, combining with the existing mature street trees to create a streetscape with high amenity. It would therefore not have a negative impact on the local character and amenity of the residential area.

The existing development on the Site and immediate surroundings cannot be considered to support a desirable place to live or work. The Planning Proposal will support the effective redevelopment of the Site for the highest and best use, facilitating a state-of-the-art facility that

provides amenity for workers and supports further renewal within the industrial precinct.

Site-Specific Merit

- *"The social and economic impact assessment presents a base case, reflecting the current potential of the site, to highlight the economic benefits of the PP. While this comparison shows clear economic advantages, it remains a simplistic one. Of more relevance would be comparisons with similar multi-level warehousing developments in comparable settings, particularly in the context of discussions about the feasibility of multi-level warehousing at a reduced height on the site."*

The existing development is nearing the end of its lifecycle, comprising aging industrial assets constructed approximately four (4) decades ago. Considering the strategic value and location of the Site, a higher density of industrial development represents the highest and best use for the Site, not currently supported by the existing planning controls.

Multi-level warehouses are necessary to service population growth within the Greater Sydney Region, particularly the increased density in in-fill areas. The development type, typically seen in land-constrained markets such as Hong Kong and Tokyo, are the result of key trends and structural changes to the industrial logistics sector, including:

1. Limited land availability and high land value in prime locations;
2. Continued growth and demand for e-commerce;
3. Expectation from consumers for reduced delivery timeframes; and
4. Demand for businesses to reduce transportation costs.

These key trends and structural changes being experienced currently within the logistics sector, which are expected to continue over the coming decades. It is therefore crucial that the Planning Proposal facilitates the highest and best use of the Site, representing a three-level warehouse and distribution centre, to future proof the Site for decades to come.

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

As outlined in the Applicant's RFI Response (**Attachment B2**), the redevelopment of the Site under the current planning controls would result in a local contribution to Council of between \$280,150 to \$336,180 (expressed in 2025 dollars).

The redevelopment of the Site under the proposed planning controls would result in a local contribution to Council of between \$2,413,600 to \$2,551,520 (expressed in 2025 dollars). This represents an approximate increase in local contributions of 800% (758% to 861%), noting the proposed HOB and FSR controls are only proposed to increase 291% and 160% respectively.

On this basis, a significantly greater local contribution would be payable as part of a future Development Application approval that would enable Council to deliver necessary public benefits in accordance with the local contribution plan.

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

As demonstrated above, the visual impacts can be mitigated through architectural quality and articulation in the detailed design phase. There are suitable examples where this has been achieved previously. The proposed HOB will not result in any overshadowing of the residential area or public open space to the east and south-east between 9am and 3pm on 21 June. It is therefore considered that the Planning Proposal will have minimal social impact in relation to 'surroundings' and will provide significant overall social benefits through the renewal of the Site and subsequent creation of jobs.

Other Matters

- *"Council acknowledges the significance of preserving and enhancing industrial land near the Enfield Intermodal. On a broader scale, the DPPI is currently conducting a thorough review of its Industrial Lands Strategy, which may lead to a Council-led comprehensive review of industrial land. This review will aim to establish*

There is currently no certainty around the timing for rezoning of in-fill industrial precincts to align with the future needs of industrial development, necessary to support population growth and increased density.

The existing development is nearing the end of its lifecycle, comprising aging industrial assets constructed approximately four (4) decades ago. Centuria cannot wait for Council or the Department of Planning,

appropriate heights and Floor Space Ratios (FSRs) that support modern industrial warehouse stacking heights, including multi-storey warehousing at suitable levels."

The Council's recognition of the need for height increases in modern industrial developments is reflected in its support for several 4.6 variation requests during Development Application assessments"

Housing and Infrastructure (DPHI) to facilitate the necessary rezoning of the Site. It is therefore seeking to renew the Site for the highest and best use, representing a flagship multi-level warehouse future proofing the Site for decades to come.

As acknowledged by Council, the existing HOB development standard does not support the orderly and economic development within the established industrial precinct. It could be argued the development standard has been virtually abandoned or destroyed by granting consent for several Clause 4.6 variation requests within the industrial precinct.

6.0 Strategic Merit

The Planning Proposal demonstrates strategic merit on the following basis:

- It is consistent with the *Greater Sydney Region Plan – A Metropolis of Three Cities* (Region Plan) and *Our Greater Sydney 2056 – Eastern City District Plan* (District Plan) for the following reasons:
 - It 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 increased productivity;
 - It leverages the size and strategic location of the Site to deliver crucial additional logistics floor space to service the growing population and density of the Greater Sydney Region;
 - It responds to the need to accommodate more than double the amount of freight expected by 2056, as identified by the Region Plan;
 - 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; and
 - It leverages the Site's proximity to Enfield Intermodal Logistics Centre and associated dedicated freight rail network, as well as 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 is consistent with the *Strathfield 2040 – Local Strategic Planning Statement* (Strathfield LSPS) for the following reasons:
 - It appropriately manages and ensures amenity is maintained to surrounding sensitive receivers, particularly in regard to visual, noise and traffic impacts;
 - It supports compatible land uses surrounding the Enfield Intermodal Logistics Centre, allowing for the increased utilisation of the intermodal centre for freight and logistics, potentially reducing heavy vehicle movements on the local and regional road network;
 - It promotes 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;
 - It will contribute to the envisaged creation of jobs within the Strathfield LGA, enabling an estimated total contribution of 467 direct full-time equivalent jobs during operation, with a total of 1,379 total ongoing full-time equivalent jobs including indirect effects; and
 - It supports the creation of a built environment that is more sustainable and efficient through the replacement of aging industrial assets for a modern state-of-the-art facility that aligns with high sustainability standards.
- It responds to the strategic value of the Site and changing dynamics of the logistics sector for the following reasons:
 - It capitalises on the strategic value 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 responds to current demand and changing dynamics in the industrial logistics sector, contributing to the fulfilment of the shortfall in logistics floor space in close proximity to trade gateways and consumers to support the growth of business in the Eastern City District;
 - 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 will significantly increase the tree canopy coverage of the Site, responding to strategic objective to increase urban tree canopy coverage in the Greater Sydney Region; and
 - It supports the renewal of the Site for development aligned with the objective for net-zero emissions by 2050 by incorporating efficient and renewable energy systems.

For a detailed assessment of strategic merit, refer to Section 6.1 of the Planning Proposal (**Attachment A1**).

7.0 Site-Specific Merit

The Planning Proposal demonstrates site-specific merit on the following basis:

- It will not 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;
- 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;
- It achieves a suitable built form outcome that manages the inherent bulk and scale of higher density industrial uses to maintain and increase amenity in the surrounding area;
- It 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;
- It increases tree canopy coverage, supporting increased amenity to the surrounding area and reduce the urban heat island effects in the local area;
- It enables future utilisation of the Enfield Intermodal Logistics Centre, supporting increased utilisation of the State's freight network and reducing heavy vehicle movements on the road network;
- It has identified management measures where appropriate, and no unacceptable environmental impacts are likely to result from the future development of the Site;
- It provides positive social impacts through 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; and
 - **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 supports significant public benefits through the creation of additional jobs in the local area, and contributing to the improved efficiency and capacity of the logistical supply chain by enabling goods to be transported to consumers faster; and
- It leverages investment made by the State Government into major freight rail and road infrastructure 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.

For a detailed assessment of site-specific merit, refer to Section 6.2 of the Planning Proposal (**Attachment A1**).

8.0 Conclusion

This letter and supporting documentation demonstrate the Planning Proposal has strategic merit and site-specific merit. On this basis, we respectfully request that the Planning Proposal be forwarded to the Sydney Eastern City Regional Planning Panel for consideration with regards to the merits of the Planning Proposal to proceed to Gateway Determination.

The Planning Proposal represents a 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. It responds to the inherent need for multi-level warehouses to service continued population growth within the Greater Sydney Region, in particular the increased density in in-fill areas. It also responds to key trends and structural changes within the logistics sector, which are expected to continue over the coming decades.

We trust this letter provides the necessary information to support the request. Should you have any queries regarding this matter or require any further clarification, please do not hesitate to contact the undersigned.

Yours sincerely,



Lachlan Jones
Senior Urbanist, Planning
ljones@ethosurban.com
0427 439 496



Christopher Curtis
Director, Planning
ccurtis@ethosurban.com
0419 660 592