

28 February 2022

[REDACTED]  
Deputy Secretary  
NSW Department of Planning, Industry and Environment  
[REDACTED]  
[REDACTED]

Dear [REDACTED]

CAMELLIA-ROSEHILL PLACE STRATEGY – [REDACTED]

We refer to the Camellia–Rosehill Place Strategy (The Strategy) prepared by the Department of Planning and Environment (the Department), and welcome the opportunity to provide feedback on it.

Goodman is a major landowner in the Camellia-Rosehill Precinct (Precinct), owning Rosehill Industrial Estate (Rosehill Estate), a 21-hectare site at 3-11 Shirley Street, Rosehill, and is therefore heavily invested in the success of the Precinct.

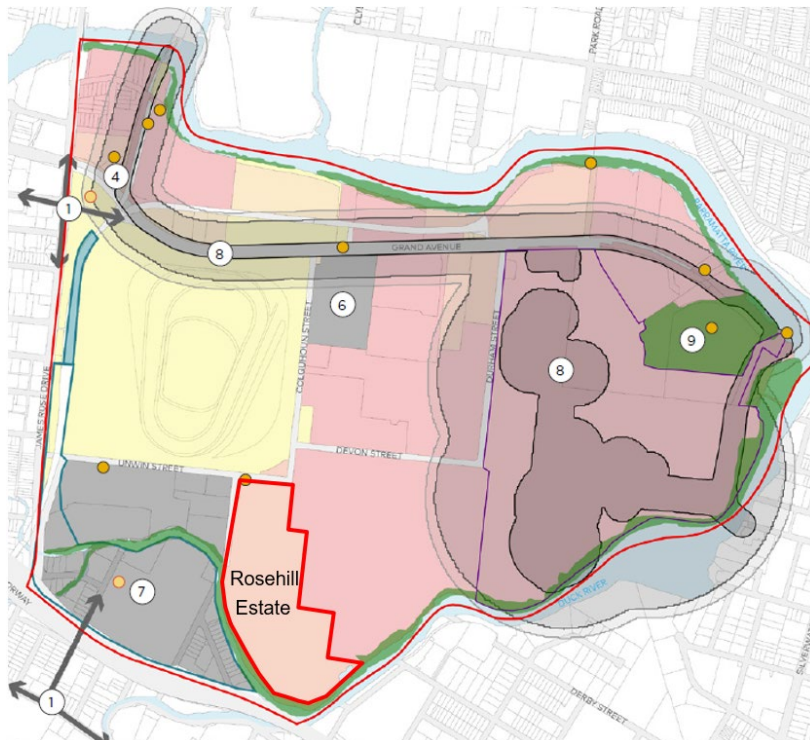


Figure 1 - Rosehill Estate within the Precinct

Goodman Group

[REDACTED]  
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## Land Use

██████████ are generally supportive of the Strategy, particularly the proposed future 'E3 – Productivity Support' zoning for 'urban services' land. This new zoning will provide appropriate land use flexibility and ensure this land acts both as a useful buffer between heavy industrial uses to the east and proposed residential, entertainment and community uses, and provide beneficial new supporting uses for the new town centre.

## Access

██████████ are pleased the Strategy acknowledges the importance of safer and more reliable road connections to and from the M4 and the State road network to service existing and future industrial and employment uses.

Maintaining the existing road connection to Parramatta Road via Wentworth, Kay and Unwin Street's is essential to the vision and potential of the Precinct being realised. Both Kay and Wentworth Street are bound on either side by the future Sydney Metro West stabling facility. ██████████ are concerned that this vital vehicular access point may be lost as the Strategy maps are not clear on the future of this road which provides a crucial alternative to the James Ruse Drive / Grand Avenue intersection as it is often heavily congested throughout the day.

The Strategy also acknowledges the importance of providing additional road connections and upgrades to the existing network, and that this is critical to enabling the revitalisation of the precinct as well as ongoing viability of the exiting industrial uses. The delivery of the following road connections should be considered a priority:

- Connections to the M4 Motorway via Unwin Street, to support heavy vehicles; and
- New bridge connecting Devon Street to Carnarvon Road in Silverwater.

As the Strategy's proposed future road improvements are not confirmed, and subject to future transport studies to determine feasibility, there is no certainty these connections can or will be provided. Future development, particularly the town centre and entertainment precinct, should not progress until the access requirements for the existing users in the precinct are ensured through adequate road infrastructure.

## Height / Floor Space Ratio

It's noted that proposed height controls proposed for the future 'Urban Services' land is 20m, which would support commercial development up to 4 storeys. An appropriate height limit should however be considered to accommodate future multi storey warehouse development.

While multi storey warehousing is common in overseas markets, particularly in China and Japan, this typology has been unfeasible in Australia due to cost. ██████████ are however now considering multi storey warehouse development in key strategic NSW industrial locations, due largely to land shortage and greenfield development constraints. ██████████ are delivering the



following two examples of multi storey warehouses in South Sydney, and hope to roll out similar development in other key sites in Greater Sydney (which may include the Precinct):

1-3 Burrows Road, Alexandria

- 3x storey warehouse
- Height: 30m
- FSR: 1.3:1
- Status: Planning Proposal approved in 2021, increasing height from 18m to 30m. Architectural design competition currently underway. State Significant DA to be prepared following competition conclusion.



Figure 2 - Concept design, 1-3 Burrows Rd, St Peters


45 Burrow Road, Alexandria:

- 2x storey warehouse
- Height: 18m
- FSR: 1.1:1
- Status: DA approved July 2021, currently under construction.



Figure 3 - 45 Burrow Rd, Alexandria

Multi storey warehousing has numerous environmental benefits over existing traditional single storey development, including:

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- Efficient land use, able to achieve double or triple the amount of floor space on the same land area, consolidating scarce industrial land in strategically located sites.
  - Sustainable use of land, reducing urban sprawl and the need to take up unnecessary green field land.
  - Reduced vehicle movements through land consolidation, and the associated reduction in carbon emissions.
  - Multi storey warehouse located in low sensitivity industrial areas have reduced visual impact resulting from building height, including overlooking and overshadowing impacts.
  - New efficient warehouse stock able to incorporate new sustainability initiatives.

While the proposed 20m height limit for the 'Urban Services' land will support double storey development, it would not enable three storey developments, which requires approximately 30m height allowance.

It is therefore requested the Strategy propose a future height control of 30m for the 'Urban Services' land rather than the proposed 20m limit.

The proposed four (4) storey control for commercial development and three (3) storey control for warehouse development is considered appropriate for the 'Urban Services' land.

To accommodate four (4) storeys of commercial and / or 3 storeys warehouse development, an FSR of 1.5:1 would be required in any future LEP amendment, rather than the currently proposed 1:1 FSR. The Department are therefore requested to update the Strategy accordingly.

The implementation of both appropriate height and FSR controls for the 'Urban Services' zoned lands within the Precinct would ensure these lands are *future proofed* for new building typologies, particularly multi storey industrial uses.

We thank you for your consideration of the above. We invite the Department to contact the undersigned on 9230 7225 for any future discussion on the Precinct.

Yours sincerely



Head of Planning