

TITLE	RESPONSE TO SUBMISSIONS	
ADDRESS	20 Kelso Crescent, Moorebank.	
REFERENCE	SSD-58978472	
CONSULTANT INPUTS	The following consultants are highlighted throughout:	WTP
		Genesis
		Nettleontribe
		Geoscapes
		Acoustic Works
		TTW
		Getex

ENCLOSURES
Report/ Document
Appendix D1 - RTS Response Matrix (this document)
Appendix D2 - Section 88B Instrument for Lot Amalgamation
Appendix D3 - Revised Architectural Drawings
Appendix D4 - Updated Landscape Package
Appendix D5 - Traffic Assessment Addendum
Appendix D6 - Flood Assessment Addendum
Appendix D7 - Flood Emergency Response Plan
Appendix D8 - Noise Impact Assessment Addendum

SUBMITTOR	MATTERS OF CONCERN	REQUESTS	RESPONSIBLE CONSULTANT	COMMENTS
Agency Advice				
Endeavour Energy	Relationship between the proposed development and Electricity Infrastructure.	<p>A number of recommendations and conditions are made, including:</p> <ul style="list-style-type: none"> The Construction Management Plan (CMP) should detail the proposed methodology on how the works will be undertaken whilst minimising the impacts of construction activities on the electricity distribution network during demolition, site preparation, excavation, and to the completion of construction. The planting of large / deep rooted trees near electricity infrastructure is opposed by Endeavour Energy. Existing trees which are of low ecological significance in proximity of electricity infrastructure should be removed and if necessary replaced by an alternative smaller planting. No planting of trees is allowed in the easement for a padmount substation. Screening vegetation around a padmount substation should be planted a minimum distance of 800mm plus half of the mature canopy width from the substation easement and have shallow / non-invasive roots. 	N/A	Noted.
			Geoscapes	<p>Regarding the planting adjacent to the Moorebank Zone Substation, Geoscapes had email correspondence with Endeavour Energy who advised that planting of 1-2m mature height, plants or hedging would not be of any concern.</p> <p>With reference to the Updated Landscape Plans enclosed at Appendix D4:</p> <ul style="list-style-type: none"> Regarding the padmount substation along Kelso Crescent, we note the slight encroachment of the tree. We have moved the tree. Refer to Geoscapes Landscape Masterplan SSD-01 and Landscape Detail Plan SSD-02. Trees that encroach the padmount substation along Seton Road have been removed. Refer to Geoscapes Landscape Masterplan SSD-01 and Landscape Detail Plan SSD-03.
Environment Protection Authority	-	No comment on this proposal and no further consultation is required.	-	No action required.
NSW Fire and Rescue	Conditions to be applied to the development	<p>The NSW Rural Fire Service has no objection to the proposed development, subject to the following conditions being applied:</p> <ol style="list-style-type: none"> Compliance is demonstrated with FRNSW fire safety guideline - Access for fire brigade vehicles and firefighters. Perimeter Vehicle Access must be provided at ground level and of an obvious and appropriate hardstand material. 	-	No action required.

		<ol style="list-style-type: none"> 2. It is the experience of FRNSW that the water demand for fire infrastructure servicing a development of this scope is unlikely to be supplied by mains water alone. FRNSW recommend that suitable design considerations are considered for the placement of tanks and other firefighting infrastructure if required. 3. That thorough analysis of the Fire Brigade Intervention Model is conducted to ensure that appropriate water supply is provided for hydrant and sprinkler systems. 4. Implement the provisions of AS2419 Appendix C (informative). 5. That travel distances are, where achievable, in line with the deem-to-satisfy provisions of D2D5 and D2D6 of the NCC. The current FRNSW policy is that no point in a fire compartment is to be more than 100m (sprinklered) or 70m (non-sprinklered) from a hydrant external to that compartment. 6. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1. 7. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans. 		
Heritage NSW	-	No comment on this proposal and no further consultation is required.	-	No action required.
Heritage NSW – Aboriginal	Conditions to be applied to the development	<p>Heritage NSW has no objection to the proposed development and recommends implementation of the unexpected finds protocol outlined in the ACHAR, though with the following changes:</p> <ul style="list-style-type: none"> ▪ The unexpected finds protocol should be updated to replace reference to the Local Aboriginal Land Council with Registered Aboriginal Parties. ▪ Sections 4-5 of the ACHAR generally require additional details as per Requirement 1a of the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (2010)</i> to ensure that the assessment of the regional archaeological data thoroughly collates existing archaeological investigations and predictive models, while ensuring it is up to date with the most recent archaeological work. ▪ As per Requirement 2 of the Code of Practice, please provide landform mapping using standard classifications, preferably referencing landform units as defined in the ‘Landform’ chapter of the Australian Soil and Land Survey Field Handbook (3rd edition). Mapping should also include relevant details such as soil landscape, landform, contour lines, water courses, and slope classification. 	-	No action required.
Sydney Water	Conditions to be applied to the development.	<p>Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application.</p> <p>The following recommended development conditions are proposed:</p> <ul style="list-style-type: none"> ▪ A compliance certificate must be obtained from Sydney Water, under Section 73 of the Sydney Water Act 1994. Our assessment will determine the availability of water and wastewater services, which may require extensions, adjustments, or connections to our mains. Make an early application for the certificate, as there may be assets to be built and this can take some time. A Section 73 Compliance Certificate must be obtained before an Occupation or Subdivision Certificate will be issued. ▪ The plans must be approved by Sydney Water prior to demolition, excavation or construction works commencing. This allows Sydney Water to determine if sewer, water or stormwater mains or easements will be affected by any part of your development. Any amendments to plans will require re-approval. Please go to Sydney Water Tap in to apply. ▪ Certain tree species placed in proximity to Sydney Water’s underground assets have the potential to inflict damage through invasive root penetration and soil destabilisation. Section 46 of the Sydney Water Act specifies what might occur when there is interference or damage to our assets caused by trees. For any trees proposed or planted that may cause destruction of, damage to or interference with our work and are in breach of the Sydney Water Act 1994, Sydney Water may issue an order to remove that tree or directly remove it and seek recovery for all loss and associated compensation for the removal. 	-	No action required.

Transport for New South Wales	Request for Further Information	TfNSW has reviewed the submitted documentation and provides the following advisory comments that should be addressed by the Applicant as part of any future Response to Submissions (RtS): The proposed development has adopted significantly lower traffic generation rates of 0.24 and 0.18 vtpm per 100sqm during the AM and PM peaks respectively. These rates are based on 4 business parks and industry estates in the Sydney metropolitan area, of which, TfNSW would consider Riverwood to be the only comparable site to this DA. TfNSW recommends the traffic generation rates for the proposed development to be determined using the Sydney Average trip generation rates of 0.52 and 0.56 vtpm per 100sqm during the AM and PM peaks in accordance with technical direction TDT 2013/04a requirements.	Genesis	This matter has been addressed in the response to Council Comment 2 within the Traffic Assessment Addendum enclosed at Appendix D5 .
		Revised modelling is recommended taking into consideration Sydney Average trip generation rates of 0.52 and 0.56 vtpm per 100sqm during the AM and PM peaks and performance levels of intersections on Heathcote Road and Newbridge Road modelled as a network	Genesis	The matter of revised modelling has been addressed in the response to Council Comment 2 within the Traffic Assessment Addendum enclosed at Appendix D5 . However, it is impractical to model the intersections along Heathcote Road and Newbridge Road as a network, as they are located too far apart with multiple traffic origins and destinations in between; all of which prevents completion of a sufficiently precise assessment.
		Any future submission should be accompanied by SIDRA files for further consideration.	Genesis	Noted. SIDRA files accompany this RTS package at Appendix D5 .
Water NSW	-	No comment on this proposal and no further consultation is required.	-	No action required.
Department of Climate Change, Energy, the Environment and Water	Flood Risk Assessment (Appendix 21)			
	Anzac Creek Flood Impacts	The Biodiversity, Conservation and Science Group (BCS) notes the flood model developed for the Anzac Creek Floodplain Risk Management Study and Plan (2008) (Anzac Creek Study) has been used to assess flooding risks at the site. The model has been updated to represent the existing development patterns of the site. The proposed regrading works and the design elements have also been considered to represent the future conditions of the site. The modelling indicates offsite impacts of less than 20mm increase in flood levels in a 1% AEP event. Mapping should be updated to show offsite impacts of greater than 10mm. The PMF event under future conditions could not be modelled for the Flood Report due to hydraulic instability of the flood model.	TTW	Please refer to the Flood Assessment Addendum enclosed at Appendix D6 . This utilises the Georges River Flood Study and Model to evaluate flooding risks associated with the Georges River.
	Anzac Creek Flood Risk	The Anzac Creek Study indicates that the backwater effect from the Georges River is the predominant driver for flooding at the site, which would become isolated and rendered a flood island for the 1% AEP event and the PMF event. The Anzac Creek Catchment downstream of the M5 Motorway (in the vicinity of this site) is impacted by the Georges River. Flooding from both Anzac Creek and Georges River must be considered in assessing flood risk at the site.	TTW	Please refer to the Flood Assessment Addendum enclosed at Appendix D6 . This utilises the Georges River Flood Study and Model to evaluate flooding risks associated with the Georges River.
	Georges River Flooding	Modelling results from the Georges River Flood Study – Final Draft Mapping Compendium (BMT, September 2019) indicate the site would become isolated in events greater than and including the 2% AEP event. The site would become a high flood island for a 0.5% AEP and rarer events. The floodwater depth in the PMF event in areas adjoining to the site would be in the order of 2m and the hazard category would be H5 to H6. The southern portion of the site would function as flood storage in a 1% AEP event. The duration of isolation would be in the order of 24-36 hours or possibly longer at the site.	TTW	Please refer to the Flood Assessment Addendum enclosed at Appendix D6 . This utilises the Georges River Flood Study and Model to evaluate flooding risks associated with the Georges River. The updated assessment demonstrates that the proposed development has no significant impact on the surrounding properties or flood behaviour. The detailed modelling, which incorporates the latest topographic survey data and compensatory flood storage measures, confirms that the flood levels and hazards remain consistent with the existing conditions. To mitigate the cumulative flood impacts, compensatory flood storage has been provided through modifications to the civil design, including excavation along the vehicle driveway and under the ground floor slab along the western boundary of the site. The proposed flood storage areas have been integrated into the TUFLOW model,

				<p>showing no change in flooding results post-development. Additionally, PMF flood modelling indicates that the site remains impacted during the PMF event, with flood depths exceeding 1 metre and flood hazards categorized as H4 and H5.</p> <p>It is important to note that Section 5.11 of the Flood Risk Management Report, issued by TTW on 13 September 2023, remains valid and is fully applicable to this assessment. This report should also be read in conjunction with the Flood Emergency Response Plan that has been prepared for the development.</p>
Evacuation Constraints and Emergency Management	The Georges River Evacuation Modelling Study (2022) indicates the site would be isolated because the western and eastern portions of Newbridge Road (adjacent to the site) and Seton Road are inundated from the 2% AEP and there is insufficient capacity via the road network to evacuate prior to these roads being cut. The study results further indicate insufficient capacity under the future growth scenarios of Liverpool CBD.	TTW	Noted. Based on the information provided in the Georges River evacuation modelling and flood evacuation analysis, evacuation measures are only necessary for the PMF event.	
	BCS recommends that any proposed emergency management strategy for the development is compatible with existing emergency management arrangements per the Local Flood Plan. Consultation with the NSW State Emergency Service is required.	TTW	An email was sent to the NSW State Emergency Service on 21 October 2024, which directed the Proponent's team to the Liverpool City Flood Emergency Sub-Plan and the flood studies on the Liverpool Council website.	
	BCS also recommends the Flood Risk Management (FRM) Manual 2023 Support for Emergency Management Planning guideline (EMO1) is used for detailed guidance. BCS is concerned that consistency with the emergency management principles contained therein could not be demonstrated. Principle 4 of the guideline states 'Decisions on redevelopment within the floodplain are supported by an EM strategy that does not increase risk to life from flooding'. Principle 5 states that 'Risks faced by the itinerant population need to be managed'. The principles of the guideline have not been addressed by the Flood Report.	TTW	Noted. A separate Flood Emergency Response Plan (FERP) has been prepared for the proposed development and is enclosed at Appendix D7 .	
	A shelter in place strategy for this development is not recommended and would not be consistent with the existing emergency management arrangements. The potential for secondary risks such as those resulting from fire and medical emergencies, as well as risks resulting from human behaviour need to be addressed. Occupants may attempt to evacuate by car despite a shelter in place strategy and encounter dangerous floodwater.	TTW	Noted. A separate Flood Emergency Response Plan (FERP) has been prepared for the proposed development and is enclosed at Appendix D7 . An Evacuation strategy has been selected for the proposed development.	
Earthworks (Cut and Fill)	Bulk earthworks have been proposed to facilitate the construction of building pads, basements and foundations for the warehouses. For the southern portion of the site, which is a flood storage, this area would be filled to prepare the building pads and the ancillary structures. BSC recommends compensatory storage be required to avoid cumulative impacts on flood behaviour.	TTW	Noted. Compensatory storage has been provided for the proposed development. Please refer to Section 2.2 of the Flood Response to Submissions Addendum enclosed at Appendix D6 for details.	
Site Suitability	BCS notes section 2.7 of the EIS advises the site 'can be serviced immediately and at no cost to Government'. However, BCS notes that in major flooding events the site would be isolated for an extended duration and roads do not have sufficient capacity to evacuate.	TTW	Noted. A separate Flood Emergency Response Plan (FERP) has been prepared for this development to facilitate evacuation during major flooding. This is enclosed at Appendix D7 .	
	<p>Section 3.1 of the EIS indicates development of the site would include 'suitable mitigation measures where required, to minimise any unforeseen impacts arising in the future'. Measures to manage the flood risk have not been addressed and documented in the EIS and Flood Report.</p> <p>BCS considers that a strata arrangement with multiple lot owners would increase the flood risk compared to a single owner due to the increased complexity of emergency management.</p>	TTW	<p>The EIS has been prepared in accordance with the Liverpool Development Control Plan 2008 (LDCP 2008) and satisfies the required conditions to minimise flood impacts.</p> <p>Additionally, a Flood Emergency Response Plan (FERP) has been developed for this project to reduce risks during evacuation. This is enclosed at Appendix D7.</p>	

NSW Department of Planning, Housing and Infrastructure (DPHI)	Environmental Impact Statement		
	Site Consolidation	The description of works in the EIS does not include subdivision. However, a plan of site consolidation is included in the appendices (Appendix 33). Please clarify if site consolidation is to be undertaken as part of the proposal and if relevant, address applicable provisions of the Liverpool Local Environmental Plan (LLEP) related to subdivision.	WTP The description of works referred to throughout the EIS includes: "Amalgamation of Lot 2 in DP 521146 and Lot C in DP 327378". This is illustrated in the Plan of Consolidation enclosed at Appendix 33 of the original submission. Please refer to Section 4.2.3 of the Response to Submissions Report for details of compliance with Clause 4.1 of the LLEP 2010 relating to 'Minimum Subdivision Lot Size'. The Section 88B Instrument for Lot Amalgamation is now enclosed at Appendix D2 of this Response to Submissions package.
	Operational Jobs	Table 23: Parking Analysis within the EIS states that 174 operational employees are projected. However, section 1.6.2 Operational Jobs states the development is anticipated to provide 200-240 jobs. Please clarify the anticipated employees for the site.	WTP It is confirmed that there will be a total of 174 staff/employees on-site at one time.
	Architectural Plans (Appendix 4)		
	Landscaping	The landscaped areas shown on Site Plan (Drawing No. 12865_DA-101 Issue D) are inconsistent with the landscape areas displayed within the landscape plans and other architectural plans. In particular, the drainage/electrical easement is shown to be an entirely soft surface area, while other plans show this area as being partially paved. Please ensure consistency among plans and provide updated landscaped area calculations in accordance with the consistent plans.	Nettletontribe Landscaping Areas on Architectural Drawings: <ul style="list-style-type: none"> Site Plan DA-101[E]; Ground Floor Plan DA-112[G]; and Level 1 Floor Plan DA-113[G] are consistent and include landscaping to the electrical easement along the western boundary, which is no longer encroached by hardstanding.
Regulatory Compliance and Accessibility (Appendix 7); Fire Safety Design Review (Appendix 19)			
Fire Access	The Department notes that Fire and Rescue NSW (FRNSW) will require perimeter emergency access to be provided in accordance with FRNSW fire safety guideline - Access for fire brigade vehicles and firefighters. The proposal does not currently comply with this requirement around the north-western, western and south western sides of the development. To achieve perimeter access in accordance with the guideline, a redesign of the development will be required to provide sufficient distance for the emergency access along the western perimeter. Please note that FRNSW will not permit emergency access to be paved with pervious pavers or other landscaped like treatments, as suggested by Council in its comments.	Nettletontribe Perimeter access is provided to the North, East and South of the building. All departures from the FRNSW Fire Safety Guideline including vehicular access along the western perimeter of the building beneath the Level 1 hardstand overhang (Clause 7.5 Overhead clearance) are managed through Performance-based design detailed in SFS FEBQ V1. The proposed warehouse development has been deemed a Large Isolated Building (LIB) as it exceeds the maximum floor and volume limitations permitted in Table C3D3 of the BCA. In this regard, the building must be provided with vehicular access provisions as permitted under Clause C3D5 of the BCA. In this instance it is proposed to permit vehicular access provisions as per the following: <ul style="list-style-type: none"> Perimeter access to the western portion of the proposed building provides a 6m vehicular path which is located greater than 18m from the building up to 25m to the northwest corner of ground floor area (i.e.: landscape area); and The current arrangement of the Perimeter Vehicular Access is proposed to pass under the 	

				<p>Level 1 hardstand and ramp as the Level 1 building overhang extends over the PVA.</p> <p>This is due to the existing easement at the west of subject site incorporating existing power poles that would affect fire truck travel and firefighting.</p> <p>The ramp and vehicular access to Level 1 (L1) are deemed sufficient and capable of facilitating fire appliance access for the Fire and Rescue New South Wales (FRNSW) brigade during firefighting operations. In addition, Fire and Rescue New South Wales (FRNSW) would have the capability to execute a turnaround manoeuvre prior to entering the Level 1 (L1) overhang area.</p>
Visual Analysis (Appendix 8)				
Articulation and Planting	<p>The Department supports Council's comments in relation to urban design. The design of the building includes large expanses of blank walls, with insufficient landscaped areas within the setbacks to provide adequate screen planting in order to soften the built form. It is recommended further articulation be applied to the facades of the development to break up the built form and minimise the visual impacts. Increased landscaped area in the setbacks of the development is also recommended in order to provide appropriate space for a greater mix of tall and medium trees to screen the built form.</p>		Nettletontribe Geoscapes	<p>With reference to the revised Architectural Drawings enclosed at Appendix D3, the key amendments in response to received submissions include:</p> <ul style="list-style-type: none"> ▪ Landscaped setback at the western boundary is increased i.e. no encroachment of hardstanding into the drainage/ electrical easement, which allows for an approx. 9.4m landscaped setback at the western boundary; ▪ The overall landscaped area within the proposed development is increased from 3,560m² (10.1% coverage) to 4,500m² (12.73% coverage); ▪ A chamfered/ curved building profile is introduced to the main warehouse structure, which is distinguishable from the northern and southern elevations; and ▪ Stepped mesh elements are introduced along the western elevation of the main warehouse structure at first floor to screen the existing electrical lines from the Level 1 hardstand.
	<p>The visual impacts of the proposal as demonstrated in viewpoints 1, 3, 5 and 6 are of particular concern. As discussed above, further articulation of the building, increased setbacks and the addition of more canopy trees would assist in minimising visual impacts.</p>			<p>In the Visual Impact Assessment viewpoints 1, 3, 5 and 6 have all been judged to have low sensitivity due to surrounding industrial context and the importance placed on views perceived by the visual receptor. Though the scale of building has substantially increased, this does not result in a high significance of visual impact for these receptor types.</p>
Traffic Impact Assessment (Appendix 9)				
1. Trip Generation	<p>The Department notes that Transport for NSW requires higher total trip generation assumptions than have been used in the Traffic Impact Assessment (TIA). All relevant sections of the TIA must be updated in accordance with the revised assumptions, and any changes assessed, including intersection performance.</p>		Genesis	<p>This matter has been addressed in the response to Council Comment 2 within the Traffic Assessment Addendum enclosed at Appendix D5.</p>
2. Car Parking and Operational Jobs	<p>Further discussion is required in relation to parking rates. The TIA states the 180 spaces provided will be adequate to cater for 174 staff on site (please clarify this number as discussed in point 2 above). However, no discussion has been provided in relation to shift change-overs over the 24-hour operation. The EIS states the development is anticipated to generate between 200-240 operational jobs. Assuming 174 is the number of employees on site at one time (and 200-</p>		WTP Genesis	<p>It is confirmed that there will be a total (maximum) of 174 staff/ employees on-site at any one time.</p>

		240 is total employees) the proposed on-site parking provision would appear to be inadequate to cater for shift change-overs.		
	3. Vehicle Manoeuvrability	The vehicle sight line triangle shown in Attachment 4 (sheet no. 01 of 15 of the TIA) at the south eastern exit to the site protrudes onto the neighbouring property. Additionally, the sightline triangle shown for vehicles exiting the southern carpark protrudes through the wall of the building (north of the driveway). Additionally, the ground level swept paths shown in Attachment 4 (sheet no. 08 of 15) indicate 19 m Articulated Vehicles (AVs) utilising the soft landscaped area (as indicated on the landscape plan) within the electrical easement along the southern boundary of the site. Amendments must be made to the plans to address these issues.	Genesis Nettletontribe	The sight triangle in the swept path assessment represents the pedestrian sightline triangle. The design objective of this pedestrian sight triangle is to ensure that drivers can see pedestrians on footpaths while exiting the site. The image below shows that the neighbouring property is bordered by mesh fencing, which will be retained following the development, does not obstruct drivers' view of pedestrians on the footpath. On this basis, the pedestrian sight line is not impeded by the neighbour property, and therefore, meets the design objective of the AS requirement. Regarding the impeded sight line from the southern carpark, no pedestrians will be walking on the driveway and thus, the pedestrian sight line is not applicable. Consequently, the triangle sight line has been removed from the swept path diagrams enclosed at Attachment 2 of the Traffic Assessment Addendum (Appendix D5).
	4. Seton Road Parking	Please confirm that no parking is permitted on the southern and eastern sides of Seton Rd where the swept paths for 19 m AVs are shown to be adjacent to the curb. Please also provide swept path assessments for the southern and northern ends of Iraking Road given the proposed truck routes indicate use of Iraking Road from the northern exit via Iraking and Seton Road to the south.	Genesis	The swept path diagrams have been revised to ensure that a 19m Articulated Vehicle clears the on-street parking. Please refer to Sheet 09 in Attachment 2 of the Traffic Assessment Addendum (Appendix D5). Furthermore, swept path assessments of 19m Avs turning at the northern and southern ends of Iraking Road are provided at Sheet 14 and Sheet 15 in Attachment 2 of the Traffic Assessment Addendum (Appendix D5).
	5. Public Transport	Further details are required regarding the bus services accessible from the site in section 10.5.3, including the frequency and destination/origin of services, to support the assumptions of the Green Travel Plan.	Genesis	Local buses serving the site are: <ul style="list-style-type: none"> Route 903: Liverpool to Chipping Norton (Loop Service) – 1 trip per hour; and Route M90: Burwood to Liverpool – 6-7 trips per hour. The closest westbound bus stop is 70m (a 1-minute walk) from the subject site. The closest eastbound bus stop is 550m (an 8-minute walk) from the subject site.
	6. Heavy Vehicle Routes	Discussion/ justification around selection of heavy vehicle routes is also required, particularly with regard to Moorebank Avenue and Heathcote Road. The Department notes that Heathcote Road appears to have significantly less exposure to adjacent residential development.	Genesis	The selection of heavy vehicle routes has been determined using the National Heavy Vehicle Regular (NHVR) route planner tool. The tool generates approved routes for heavy vehicle use, ensuring the shortest trip to and from the subject site with minimal impact on neighbours and surrounding properties.
Landscape Plan (Appendix 10)				
	Planting	Concern is raised with regard to the planting proposed in the southern front setback to Seton Road, and within the area bounded by the warehouse and the ramp up to the northern end of the upper level loading dock area. These areas will receive very little sunlight meaning the plant selection is restricted, and therefore insufficient to provide sufficient mitigation for the bulk and scale of the proposal. Please provide discussion on the ability of the proposed planting to thrive in these areas given the lack of sunlight, and in particular in the southern front setback area for planting to achieve the full heights listed.	Geoscapes	Planting has been revised to incorporate more resilient species with respect to shade conditions. With reference to the Updated Landscape Plans enclosed at Appendix D4 , refer to Geoscapes Landscape Detail Plan SSD-03 and Plant Schedule SSD-12 .

	As discussed, the Department concurs with Council that further landscaped area and planting should be provided in the setbacks to help mitigate the visual impacts of the built form.		With reference to the revised Architectural Drawings enclosed at Appendix D3 , the key amendments in response to received submissions include: <ul style="list-style-type: none"> ▪ Landscaped setback at the western boundary is increased i.e. no encroachment of hardstanding into the drainage/ electrical easement, which allows for an approx. 9.4m landscaped setback at the western boundary; ▪ The overall landscaped area within the proposed development is increased from 3,560m² (10.1% coverage) to 4,500m² (12.73% coverage); ▪ A chamfered/ curved building profile is introduced to the main warehouse structure, which is distinguishable from the northern and southern elevations; and ▪ Stepped mesh elements are introduced along the western elevation of the main warehouse structure at first floor to screen the existing electrical lines from the Level 1 hardstand.
Noise and Vibration Assessment (Appendix 15)			
Traffic Noise	Detailed assessment of the noise impacts of off-site road traffic is required. The assessment should include differentiation of numbers of heavy (more than 2 axles) and medium sized rigid trucks in the calculation of noise impacts. Detail must also be provided in relation to any stopping/acceleration points on truck routes and impacts to adjacent development. Feasible and reasonable mitigation measures should be discussed and justified before stating that any increase below 2 dB is negligible and does not require mitigation (as prescribed by Fact Sheet F of the NPF1).	Genesis Acoustic Works	Please refer to the Noise Assessment Addendum enclosed at Appendix D8 .
Heavy Vehicle Routes	Discussion/ justification around selection of heavy vehicle routes is also required, particularly with regard to Moorebank Avenue and Heathcote Road. The Department notes that Heathcote Road appears to have significantly less exposure to adjacent residential development.	Genesis	The selection of heavy vehicle routes has been determined using the National Heavy Vehicle Regular (NHVR) route planner tool. The tool generates approved routes for heavy vehicle use, ensuring the shortest trip to and from the subject site with minimal impact on neighbours and surrounding properties. All haulage routes have been assessed based on the Traffic engineers advice and found to satisfy the assessment requirement for the NSW Road Noise Policy 2011.
Consequential Update to Noise Assessment	The Noise and Vibration Assessment must also assess any altered impacts as a result of the altered traffic generation assumptions discussed above.	Acoustic Works	Please refer to the Noise Assessment Addendum enclosed at Appendix D8 .
Statement of Heritage Impact (Appendix 28)			
Clinches Pond Receptor	The Statement of Heritage Impact states the development is not within the visual catchment of Clinches Pond. However, the Visual Impact Assessment includes a viewpoint from just in front of the Clinches Pond area, looking west along Deadman Road towards the development, which clearly indicates an impact on the visual catchment. Please provide a heritage assessment in this regard.	Geoscapes	Please refer to the Drone Analysis Figures 6, 10 and 14 within the Visual Impact Assessment enclosed at Appendix 8 of the original submission. These demonstrate that there is no view just in front of the Clinches Pond area.
Demolition/ Contamination			
Consequential Updates (Demolition)	Please update the relevant appendices with regard to the demolition proposed as part of the SSDA, updating any impacts - including: <ul style="list-style-type: none"> ▪ Appendix 14 Air Quality Assessment, ▪ Appendix 16 CNVMP, 	Willowtree	Demolition is not proposed as part of this SSDA. Table 11 in the EIS refers to 'Main Construction Site Preparation Requirements' and specifies the following:

		<ul style="list-style-type: none"> ▪ Appendix 23 Hazardous Building Materials Register, ▪ Appendix 24 Hazardous Building Materials Plan, ▪ Appendix 18 Detailed Site Investigation, ▪ Appendix 22 Phase 1 Environmental Assessment, and ▪ Appendix 25 Remediation Action Plan <p>Identify data gaps that need to be addressed once demolition of buildings on site has been carried out. Now that the majority of the demolition has been carried out on site, these data gaps must be addressed prior to any determination of the application.</p>		<p><i>“Demolition of existing buildings and structures are to be regularised pursuant to Part 7 of the State Environmental Planning Policy (Exempt and Complying Development Codes) 2008.</i></p> <p><i>For completeness, the following works will be subject to a Complying Development Certificate:</i></p> <ul style="list-style-type: none"> ▪ <i>Demolition and removal of existing buildings and structures (including retaining walls)</i> ▪ <i>Demolition and removal of existing pavement and concrete slab;</i> ▪ <i>Demolition and removal of building services;</i> ▪ <i>Removal and disposal of all above ground tanks; and</i> ▪ <i>Remediation (building and above ground)</i> <p><i>The removal of the five (5) subterranean fuel tanks and the subterranean oil/ water separator is otherwise sought as part of this SSDA.”</i></p> <p>The removal of the five (5) subterranean fuel tanks and the subterranean oil/ water separator is referenced within the scope of works throughout the EIS.</p> <p>We note that the Complying Development Certificate has otherwise been granted since the preparation of the EIS, and the works approved under Part 7 of the Codes SEPP have accordingly been undertaken at site.</p>
<p>Liverpool City Council</p>	<p>General Considerations</p>		<p>WTP</p>	<p>The proposed use of the development is for the purpose of a Warehouse and Distribution Centre. This is defined within the Liverpool Local Environmental Plan 2008 (LLEP 2008) as:</p> <p><i>“a building or place used mainly or exclusively for storing or handling items (whether goods or materials) pending their sale, but from which no retail sales are made, but does not include local distribution premises.”</i></p> <p>This constitutes a tightly controlled scope of permissible activities.</p> <p>We also note that the Site is located within an existing industrial precinct and is surrounded by industrial buildings of similar uses at all boundaries. Furthermore, the closest residential receptors are in excess of 400m from the Site.</p> <p>It is proposed that an appropriately worded condition of any Development Consent prescribe that the 24-hour operation is permitted for a 12-month trial period from the date of issue of the first Occupation Certificate. Any complaints received during this period would necessitate the preparation and submission of evidence</p>
<p>24 Hour Operation</p>	<p>A blanket 24-hour operation is not considered suitable for this development. At this stage, it is unclear what the end uses for the warehouses will be, and allowance for 24-hour operation does not take into the consideration the potential impacts of each use. Therefore, Council is of the opinion that approval for 24-hour operation should be removed from the application. If a land use within this development requires 24-hour operation, a separate Development Application should be lodged with Council as part of the end use, so the impacts can be appropriately assessed</p>			

				demonstrating successful mitigation pursuant to the condition of the Development Consent.
Signage	The signage proposed as part of this application seems excessive. The DCP (Part 1, Section 26 'Outdoor Advertising and Signage') limits free standing signs to a maximum 5m in height. Council requests the proposal is amended to comply with Council's DCP.		WTP Nettletontribe	With reference to the revised Architectural Drawings enclosed at Appendix D3 , refer to DA-902[D] for details of the revised signage. The previous 10.04m Estate Entry Sign has been reduced to a 5m combined Estate Entry/ Truck Entry and Exit sign, which complies with the relevant provisions of the Liverpool Development Control Plan 2008 (LDCP 2008).
Driveway over Easement and Easement Relinquishment	Endeavour Energy must be consulted and support the relocation of the easement.		Nettletontribe	With reference to the revised Architectural Drawings enclosed at Appendix D3 , refer to DA-112[G] and DA-113[G] . This confirms that there will be no new road or structure on the easement.
Location of Kiosk sub-station	An alternative location should be considered for the kiosk substation, which integrated it better into the building and landscaping, where it is adequately screened.		Nettletontribe	Both the Kelso Crescent and Seton Road substations have been located based on Electrical Consultant advice and details documented on the Electrical Reticulation Plan UIL6618. The Kelso Crescent kiosk substations have been located away from pedestrian entry points and setback behind a 4m wide landscape buffer. The Seton Road Substation has been integrated into the pedestrian footpath entry to the Site but concealed behind screening and signage.
Industrial Land Strategy	Requests consideration of the Liverpool Industrial and Employment Land Strategy.		WTP	The <i>Liverpool Industrial and Employment Land Strategy</i> is considered at Section 2.6.4 of the EIS. Section 4.2.2 of the Response to Submissions Report further considers the <i>Liverpool Industrial and Employment Land Strategy</i> in relation to the proposed development.
Urban Design Considerations				
Landscaping Setbacks	Seton Road setback interpreted as a primary setback and should be increased to 10m.		WTP	The Seton Road setback ranges from 9m to 16.8m when measuring the new building line to the property boundary, which is fully landscaped except for the entry/ egress points, and accounts for the stepped form of the site's southern (rear) boundary.
Built Form and Street Interface	Excessive stairs and ramps are overtaking space in the setback that could be dedicated to landscaping and deep soil. The ground level of the southern elevation on Seton Road is mostly blank wall and not an acceptable street interface. Car parking on a street frontage is a poor urban design and amenity outcome. Council staff request clarification of how many levels of car parking are visible from the street interface, and drawings should be updated accordingly to resolve any inconsistencies or missing details.		Nettletontribe	Kelso Crescent The proposed building on Kelso Crescent integrates an office and car park. Two levels of car park are visible above the natural ground level. The facade conceals these areas with varying materials, creating a cohesive visual identity. Strategically placed cladding and green elements further enhance the building's appearance behind the landscape setback of 10m from the Kelso Crescent Street front.

				<p>Seton Road</p> <p>The façade facing Seton Road is driven by the functional form of the multi-storey warehouse.</p> <p>The southern façade is articulated through the use of a variety of materials including textured and natural precast, metal cladding and feature vertical strip glazed elements. More expansive glazed areas on the south-western corner of the façade highlight the adjoining office, providing visual presence and passive surveillance on the corner of Seton Road.</p>
Ground Levels	<p>Requests the applicant investigate the ground levels, prioritising the level transition at the street interface, and propose a ground level more aligned with the street. If the ground level is not lowered, then justification for the levels should be provided to Council to review.</p> <p>Requested the applicant show the existing ground line dashed on the sections, to enable for a review of the proposed levels and whether it is appropriate for the site and street interface.</p>		<p>Nettleontribe</p>	<p>Existing ground line shown dashed on DA-301[C]</p> <p>The Seton Road basement level is governed by the 1-in-100 year flood levels along the southern boundary. As the site is bound by Kelso Crescent to the north and Seton Road to the south, the levels of the building have been designed to address both street frontages whilst allowing for heavy vehicle movement throughout the site.</p>
Sustainability	<p>The design of the separate emergency vehicle access driveway results in a considerable amount of concrete surface area that will rarely be used and will greatly contribute to the Urban Heat Island. Council staff encourage the applicant investigate innovative strategies surrounding design and materiality of the driveway, to enable emergency vehicle requirements to be met whilst still minimising impact to the environment, (i.e. permeable materials, with less heat absorption).</p> <p>Council staff strongly encourages the applicant commit to a number of solar panels and utilise as much of the roof space as possible</p>		<p>Nettleontribe</p>	<p>Permeable material is not permissible by FRNSW as heavy vehicles will need to operate in these areas.</p>
Landscaping Drawings	<p>The drawings submitted do not include the public domain delivery as part of this project. The documentation should include a public domain which includes (but is not limited to) the following:</p> <ul style="list-style-type: none"> ▪ Existing and proposed footpath embellishments; ▪ Driveway laybacks; ▪ Intersection of driveways and public pathways; ▪ Existing / proposed kerb and gutter embellishment. Existing driveways no longer used should be removed; ▪ Connection between pedestrian access points and public footpaths; ▪ Street trees to be provided and to Council recommended species, including minimum 200L pot size at the time of installation; ▪ Landscaping and turf verges; and ▪ Consideration of line of sight around site entry and exit points. 		<p>Geoscapes WTP</p>	<p>It is proposed that this further level of detail is submitted for approval pursuant to an appropriately worded condition of any Development Consent.</p> <p>This requested further information would be prepared by the Main Contractor for approval prior to the issue of any Construction Certificate(s).</p>
Tree Retention	<p>Several native, mature trees in good condition and within the front landscape setback and proposed to be removed (being: T15, T16, T17, T36 and T37), and this is not supported.</p> <p>Pot sizes should therefore be increased for several of the trees to a minimum 100L, and 200L for street trees, to reduce the time it will take for canopy to establish.</p>		<p>Nettleontribe Geoscapes</p>	<p>Pot sizes have been updated to the sizes recommended. Refer to Geoscapes plant schedule on SSD-12.</p> <p>The proposed development has considered the importance of retaining as many of the large existing trees as possible whilst balancing the commercial viability of the project. Existing trees are to be removed only when absolutely necessary, due to site constraints, the location of underground services, or when the tree protection zone (TPZ) is affected by the planned building footprint</p>

				<p>The design prioritises the preservations of 5-off large existing trees along the Kelso Crescent Street Interface (T34, T35, T38, T39 and T40), maintaining significant existing canopy cover over the north of the site. An additional existing tree (T16), located on Seton Road boundary, is now also retained on the amended architectural plans to provide additional existing canopy cover to the south of the site</p> <p>All existing significant trees to be removed as part of the development are to be replaced with new trees of a pot size between 100-200L to comply with Liverpool City Council's request. Additional proposed new trees are to be planted throughout 4,425sqm (12.6%) of dedicated landscaping areas proposed for the site in a variety of shallow and deep soil conditions. Refer to Geoscapes Landscape Detail Plans SSD-02 to SSD-05 for proposed new and SSD-07 for existing tree locations.</p>
Safety and Amenity	<p>The Kelso Crescent car park entry is very close to the main pedestrian entry. Council recommends the applicant increases the separation between both entries to improve safety for pedestrians.</p> <p>Council is supportive of the external terrace to the office space, however, seeks clarity as to whether it is accessible to all staff or just those working in the adjacent office. The applicant should demonstrate that all staff frequenting this development have access to good quality communal space</p>		Nettletontribe	<p>The Kelso Crescent Car Park and Pedestrian entries are separated by an 8m landscape area.</p> <p>The outdoor Recreational Area on Level 1 office building, will be accessible to all staff.</p>
Traffic Planning Considerations				
1. Traffic Generation	<p>The submitted Traffic Impact Assessment (TIA) appears to underestimate the traffic generation of the development by using lower traffic generation rates compared to the Sydney average trip generation rates provided in the TfNSW 'Guide to traffic generating developments'.</p>		Genesis	<p>Section 8.1 of the TIA thoroughly examined the discrepancy found in the TfNSW published data. However, the assessment has now been updated to reflect 0.52 vtpd and 0.56 vtpd.</p> <p>The corresponding assessment outcome is provided below under '2. Intersection Assessment' and is referred to within the Traffic Assessment Addendum (Appendix D5) as "Response to Council Comment 2".</p>
2. Intersection Assessment	<p>The TIA report indicates that the intersection of Newbridge Road and Kelso Crescent will operate at an unacceptable Level of Service in the future, particularly for right turn movements from Kelso Crescent. A Comprehensive Road Safety Review is recommended, to identify necessary treatments for improving safety at this intersection.</p> <p>The applicant also needs to reassess the intersection performance based on the traffic generation using the TfNSW rates (0.52 and 0.56 vtpd for the AM and PM peak respectively) and identify any improvements that may be required to mitigate the impacts from the development.</p>		Genesis	<p>This is discussed in detail under 'Council Comment 2' within the Traffic Assessment Addendum enclosed at Appendix D5.</p> <p>The updated SIDRA results are presented within the Transport Impact Assessment Addendum (Error! Reference source not found.). The SIDRA analysis demonstrates the following:</p> <ul style="list-style-type: none"> ▪ The local road network can absorb the proposed development without a decrease in the Level of Service (LOS). ▪ It is noted that by 2033, the southern approach of Kelso Crescent at its intersection with Newbridge Road will fail under the AM peak background traffic demand, irrespective of the addition of the proposed development. It is expected that area/precinct-wide traffic investigations will have been undertaken by this point in time to ensure the local

				road network can accommodate this anticipated increase in background traffic.
3. Vehicular Access	The proposed five (5) driveways is excessive and will reduce the availability of on-street parking. Google maps show a high level of occupancy of on-street parking on the streets fronting the development site. It is the requested the proposal reduce the number of access driveways. For instance, the proposed truck entry access on Kelso Crescent near the intersection with Newbridge Road can be amalgamated with the second access for trucks away from the intersection.		Genesis Nettletontribe	<p>Dedicated driveways have been provided to separate light and heavy vehicle traffic.</p> <p>The proposed truck driveways at Kelso Crescent are used for different purposes. The eastern truck driveway is used for truck entry/ exit for the warehouses at Level 1; the western truck driveway is used for 'truck entry only' for the warehouses at Ground Floor.</p> <p>The proposed driveways at Seton Road are primarily used for heavy vehicles exiting the warehouses at Ground Floor, and for light vehicle access to the basement car park.</p> <p>The design cannot physically accommodate a consolidated driveway arrangement at the Kelso Crescent frontage. This is due to the different levels with one ramp leading to the first-floor level; and another to the ground level.</p> <p>With reference to the Traffic Assessment Addendum enclosed at Appendix D5, the development as currently proposed necessitates the potential loss of up to four (4) car parking spaces on the street. If Council's recommendation is implemented, i.e. consolidating the two driveways at Kelso Crescent, the loss would likely be 3 spaces (a saving of just 1 space). It is our view that the quantum lost (4 spaces) is not significant.</p> <p>Notwithstanding, if it is deemed necessary, the Applicant is amenable to commissioning a brief survey of the surrounding car park to ascertain their actual demand to determine whether the anticipated loss would be materially adverse to the local area.</p>
4. Parking Provisions	<p>The TIA indicates that the development will provide 180 parking spaces. This is 14 spaces short of the 194 spaces requirement the DCP. The DCP provides car parking rates that are localized and considerate of the Liverpool context. The applicant therefore needs to provide all 194 car parking spaces on site as per the DCP.</p> <p>It is noted that the development proposes to provide 33 bicycle storage spaces (30 for employees and 3 for visitors), 4 shower/change rooms (2 males, 2 females) and 30 lockers. This is acceptable.</p>		Genesis WTP	<p>The proposed car parking number is a suitable balance between the RMS and LDCP 2008 criteria. The anticipated onsite employment projection is 174 individuals. The provision of 180 spaces is in line with the development context and is in keeping with the overall 'green travel' initiative, which is underpinned by a principle that is applying a constraint/ control of parking supply to discourage excessive private vehicle use.</p> <p>By contrast, a move towards providing more parking spaces onsite (well in excess of anticipated employment figures) appears to contradict the very objective stated in Council's Comment No. 6, below, in connection with green travel planning.</p> <p>For this reason, the assessment deems the proposed 180 spaces are a suitable arrangement which has regard to the site's location, accessibility and are adequate for the development.</p>

5. Pedestrian Crossing Facilities	There are currently no safe pedestrian crossings to enable access to the bus stops on the northern side of Newbridge Road. Council recommends considering and identifying pedestrian crossing facilities on both Newbridge Road and Kelso Crescent to improve safety for pedestrians	Genesis	Signalised pedestrian crossing is available at the intersection of Newbridge Road and Epsom Road some 450m (well within walking distances) to the east of the subject site. In relation to crossing opportunity on Kelso Crescent, Council may consider the installation of pedestrian refuge on the less trafficked Field Close.
6. Green Travel Plan Mode Share Target	The proposed 20% mode share target for public transport outlined in the Green Travel Plan is unlikely to be achieved without targeted interventions. Council therefore recommends further exploration of practical solutions, to promote public transport usage and reduce reliance on private vehicles.	Genesis	Regardless of any intervention, the availability and accessibility of alternative mode of travel are crucial in the GTP's implementation/effectiveness. In this context, the GTP aims to reduce reliance on private vehicles for travel to and from the site. Providing enough onsite parking for each employee expected to work at the premises does not align with the intention of encouraging occupants to use public transport. Therefore, the assessment takes the view that reducing onsite parking or allocating spaces to specific user groups, such as carpooling participants or users with specific needs, is the most practical approach to achieve the targeted public transport mode share.
7. Design Drawings of Access and Parking Arrangements	The applicant will be required to provide design drawings of the proposed driveway and parking arrangements (including ramps and aisles) which are to be prepared in accordance with the DCP and Australian Standards. This is to be accompanied by swept path diagrams to demonstrate that all expected vehicles can be accommodated. This will be presented to the Liverpool Local traffic Committee for assessment and approval.	Genesis Nettletontribe	With reference to the Updated Architectural Drawings enclosed at Appendix D3 , refer to drawings AR-423 and AR-424 for the vehicular ramp details. The proposed parking access and layout have been assessed against AS2890.1:2004 and AS2890.2:2018. The assessment confirms that the design provisions are sufficient and comply with the relevant standards. Further details of the assessment can be found under Attachment 2 of the Traffic Response Statement enclosed at Appendix D5 .
8. Referral to TfNSW	As Newbridge Road is a state road, under the care and control of Transport for NSW (TfNSW), this application is referred to TfNSW for their comments. Specifically, Council seeks their input on road safety treatments at the Newbridge Road/ Kelso Crescent intersection.	Noted	Acknowledged. The assessment highlights that consultation with TfNSW has been undertaken as part of Attachment 5 in the TIA. The feedback received from TfNSW has been addressed in the submitted TIA.
Flooding Considerations			
Flooding Considerations	The development site is located within the Anzac Creek catchment. The site is partially affected by flooding under the 1% Annual Exceedance Probability (AEP) event. Additionally, the site is characterised by evacuation challenges, as the access road will be entirely submerged during the 1% AEP flood event. The following must therefore be addressed as part of the application: <ul style="list-style-type: none"> ▪ The submitted Flood Impact Assessment report indicates that the development will fill the floodplain by approximately 7,500 m³. According to Council policy, there must be no net loss of flood storage volume below the 1% AEP flood level. Therefore, the design must be amended to include compensatory excavation, to ensure that the development does not result in any net loss of flood storage volume below the 1% AEP flood level. The Flood Impact Assessment Report shall be revised including the details of flood compensatory works, pre- and post-development flood storage volume calculations and a plan showing the location of flood compensatory excavation works. 	TTW	Noted. Compensatory storage has been provided for the proposed development. Please refer to Section 2.2 of the Flood Response to Submissions Addendum enclosed at Appendix D6 for details.

	<p>The Flood Report by TTW has not provided any detail about flood emergency response plans for the site. The report has only indicated a 'shelter-in-place' approach as the flood emergency management response for the site. However, the flood duration of the proposed development site is greater than 24 hours. Therefore, 'shelter-in-place' is not an acceptable flood emergency management response for the development site.</p>	TTW	Noted. A separate Flood Emergency Response Plan (FERP) has been prepared for the proposed development and is enclosed at Appendix D7 .
	<p>The proposed development site is located within the Liverpool Collaboration Area. Molino Stewart Pty Ltd, engaged by Council, conducted the Georges River Evacuation Modelling to examine flood evacuation challenges for the Moorebank Peninsula and Liverpool Collaboration Area. According to the Georges River Evacuation Modelling report (dated March 2022), the proposed development site faces significant flood evacuation constraints and will be completely isolated during the 1% AEP flood event.</p>	TTW	Noted. The Georges River Evacuation Report, which is prepared by Molino Stewart Pty Ltd, has been used for preparing the Flood Emergency Response Plan (FERP) enclosed at Appendix D7 .
	<p>The applicant shall prepare a comprehensive Flood Emergency Response Plan (FERP) to ensure the safe evacuation of people during floods up to and including the Probable Maximum Flood. The FERP should be developed in consideration of the findings from the Georges River Evacuation Modelling report by Molino Stewart (dated March 2022) and comply with the NSW Flood Manual (2023) toolkit: 'Support for Emergency Management Planning Guideline EM01'. The NSW State Emergency Service (NSW SES) should be consulted during the preparation of the FERP.</p>	TTW	Noted. The Georges River Evacuation Report, which is prepared by Molino Stewart Pty Ltd, has been used for preparing the Flood Emergency Response Plan (FERP) enclosed at Appendix D7 .
Environmental Health Considerations			
Remedial Action Plan	<ul style="list-style-type: none"> ▪ Although a cap and contain strategy may be a cost-effective remedial strategy, it does not provide the best level of protection for the environment and human health, and is therefore not generally endorsed by Council's Environmental Health Section. ▪ Onsite management of contamination would require the preparation of a Long-Term Environmental Management Plan. The proposed remediation strategy comprising onsite containment and management of asbestos contamination will result in a contaminated land notation on the property's planning certificate. The Environmental Health Section generally attempts to deter applicants from adopting a remediation strategy which results in the land being encumbered by a Long-Term Environmental Management Plan and planning notation. 	Getex	No contain strategy or long-term environmental management plan is required as all asbestos has been removed by the Contractor during the demolition regularised under Part 7 of the Codes SEPP.
Site Audit	<ul style="list-style-type: none"> ▪ If the contingency strategy is to include on-site encapsulation of contamination, the applicant is required to engage a site auditor to confirm adherence to relevant standards, procedures and guidelines, and provide greater certainty about the information on which the consent authority is basing its decision. ▪ In this regard, the application shall be accompanied by a Section B Site Audit Statement and Site Audit Report prepared by a NSW EPA Accredited Site Auditor confirming that: <ul style="list-style-type: none"> ○ The nature and extent of contamination has been appropriately determined at the proposed development site; ○ The investigation, remediation or management plan is appropriate for the intended purpose; and ○ The site can be made suitable for the proposed land use in accordance with the Remediation Action Plan and management plan. ▪ The Site Audit Statement shall also confirm that the investigation reports were carried out in accordance with the Contaminated Land Planning Guidelines and all other applicable guidelines. If remediation is to include a cap and contain strategy, it is requested that the site auditor reviews the Long-Term Environmental Management Plan for ongoing management of the site. 	Getex	No on-site encapsulation is required as all asbestos has been removed by the Contractor during demolition.
Long-Term Environmental Management Plan	<p>If remediation is to include a cap and contain strategy, a copy of the Long-Term Environmental Management Plan must be submitted to the consent authority for review.</p>	Getex	No contain strategy or long-term environmental management plan is required as all asbestos have been removed by the Contractor during demolition.
Site Regulation	<p>The Environmental Health Section wishes to highlight the following key points regarding the proposed development:</p> <ul style="list-style-type: none"> ▪ The Department will have primary responsibility for assessing compliance with conditions of consent in relation to environmental emissions (i.e. noise, air, water, land) during the construction and operational phases of the project; and ▪ Comprehensive compliance monitoring initiatives that incorporate both qualitative and quantitative measures must be incorporated in the proposed development. It is strongly believed that data collected using quantitative methods 	Noted	Noted.

		for the duration of construction and operational phases of the project would assist with determining compliance and encourage environmental best practice.		
	Regulated Systems	The applicant must confirm whether regulated systems such as cooling water systems will be installed as part of the project, in accordance with the <i>Public Health Act 2010</i> .	ACOR	ACOR: Warm water for amenities via TMVs will be provided as per AS3500, which is compliant with the Public Health Act. We don't have any cooling water specified for this project.
	State Environmental Planning Policy (Resilience and Hazards) 2021	Despite information included in the EIS, the proposed warehouse development may be used for the storage and handling of flammable and combustible liquids. To address the requirements of State Environmental Planning Policy (Resilience and Hazards) 2021, the consent authority must consider whether the applicant is required to prepare a preliminary screening procedure and/or Preliminary Hazard Analysis for the proposal.	WTP	Noted.
Waste Management Considerations				
	Waste Management	Council's strong preference is for waste collection activities to take place within the site itself. All waste bins must be stored and presented for emptying with lids fully closed and not overflowing so as to prevent litter escaping into the broader environment.	N/A	Noted.
Engineering Considerations				
	Engineering Considerations	<p>A number of conditions of consent are recommended, including:</p> <ul style="list-style-type: none"> ▪ Prior to the issue of a Construction Certificate a S138 Roads Act application/s, including payment of fees shall be lodged with Liverpool City Council, as the Roads Authority for any works required in a public road. ▪ All retaining walls shall be of masonry construction and must be wholly within the property boundary, including footings and agricultural drainage lines. Construction of retaining walls or associated drainage works along common boundaries shall not compromise the structural integrity of any existing structures. Where a retaining wall exceeds 600mm in height, the wall shall be designed by a practicing structural engineer and a construction certificate must be obtained prior to commencement of works on the retaining wall. ▪ The proposed development and stormwater drainage system shall be designed to ensure that stormwater runoff from upstream properties is conveyed through the site without adverse impact on the development or adjoining properties. Engineering plans and supporting calculations for the stormwater drainage system should be prepared by a suitably qualified engineer. ▪ A Dilapidation Report of all infrastructure fronting the development in Kelso Crescent and Seton Road is to be submitted to Liverpool City Council. The report is to include, but not limited to, the road pavement, kerb and gutter, footpath, services and street trees and is to extend 50m either side of the development. 	N/A	<p>Noted.</p> <p>These points can be controlled by appropriately worded conditions of any Development Consent.</p>
Public Submissions				
Name Withheld	Traffic	<p>My objection with this application is the one-way traffic flow through this new complex thus exiting on Seton Road.</p> <p>This street for many years has been subject to council concerns based on the already heavy traffic flow and the overcrowded parking issues caused from the already heavy vehicles / trucks and cars in the area.</p> <p>Seton Road is not a very wide road and with cars / trucks parked on either side of the road (2) trucks cannot pass in this road thus creating seriously dangerous situations. Over the years this road has seen many vehicles damaged due to heavy vehicles crashing into parked cars etc.</p> <p>The traffic lights situated at Seton Road / Heathcote Road currently cause many delays for any vehicles exiting this industrial estate. Queues to exit this estate in the afternoons can nearly reach the proposed development site.</p> <p>I have serious concerns that if this development is able to proceed with its current traffic flow plan this would cause catastrophic safety issues on the Seton Road and the surrounding streets which are already struggling to cope.</p>	Genesis	<p>Regarding the suitability of Seton Road in the context of this development, the assessment indicates that the proposed land use is consistent with the site's existing character and is in keeping with the surrounding areas. Seton Road has accommodated industrial vehicles for many years without significant issues, as demonstrated by the minimal number of vehicle crashes or incidents recorded in the TfNSW Crash Data (Section 3.4 of the TIA).</p> <p>Concerning traffic delays and queues on Seton Road, the site is located approximately half a kilometre north of the signalised intersection between Seton Road and Heathcote Road. Observations at the site did not show traffic queues reaching or approaching the site during peak periods of road network activity.</p>

Yensate Pty Ltd	Traffic	<p>We are the property owners at 353 Newbridge Rd, Moorebank and have been identified as a neighbouring property for the development reference SSD-58978472, located at 20 Kelso Crescent, Moorebank.</p> <p>The intersection at Kelso Crescent and Newbridge Road requires traffic lights to support the heavy vehicle traffic that will be additionally increased by the sizable development. In addition, a decrease in the road speed along Newbridge Rd, between Bridge Rd, Moorebank and Kelso Crescent to 60klm is required.</p> <p>Please note that the Kelso Crescent/ Newbridge Road intersection is already dangerous and congested with heavy vehicles accessing Newbridge Road from Kelso Crescent and we have seen numerous accidents at this intersection, some serious.</p> <p>If the above recommendations are included in the development SSD-58978472, we would welcome the project without objection.</p>	Genesis	<p>The Traffic Impact Assessment examines the road network's peak periods, typically between 7am and 9am, and 4pm and 6pm. During these times, the assessment for the development projects (using conservative traffic generation rates published and provided by TfNSW) anticipates five (5) trucks per hour turning left from Kelso Crescent onto Newbridge Road in the morning and six (6) trucks per hour in the afternoon. Tables 3, 4, and 5 on pages 3 and 4 of this submission also demonstrate that the development does not significantly degrade the intersection's level of service.</p> <p>Regarding crash and safety concerns, Section 3.4 of the TIA, which addresses historical crash data at the intersection, recorded five (5) different crashes over a 5-year period. There was no repetitive crash type to suggest any specific road or design deficiency that would constitute a significant safety issue in the design.</p> <p>The assessment acknowledges that background traffic growth will exceed the intersection's capacity by 2033. However, this is not a consequence of the traffic generated by the proposal but rather the result of background traffic growth.</p>
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