



# WILLOWTREE PLANNING

## **SUBMISSIONS REPORT: Kelso Crescent Multi-Level Warehouse, Moorebank**

20 Kelso Crescent, Moorebank, NSW 2170  
Lot 2 in DP 521146 and Lot C in DP 327378

—  
Prepared by Willowtree Planning Pty Ltd  
on behalf of Mapletree SR Australia Management Pty Ltd

**13 December 2024**

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**In the spirit of reconciliation and recognition, Willowtree Planning acknowledges the Traditional Owners of this Country throughout Australia and their continuing and ongoing connections to land, waters and community. We show our respect to Elders - past and present. We acknowledge that we stand on this Country which was and always will be recognised as Aboriginal Land. We acknowledge the Traditional Owners of the Lands in this Local Government Area, belonging to the local Aboriginal People, where this proposal is located upon.**

**SUBMISSIONS REPORT**

Kelso Crescent Multi-Level Warehouse, Moorebank  
20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

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## TABLE OF CONTENTS

<b>TABLE OF CONTENTS</b> .....	<b>ii</b>
<b>APPENDICES LIST</b> .....	<b>iii</b>
<b>EXECUTIVE SUMMARY</b> .....	<b>1</b>
<b>PART 1 INTRODUCTION</b> .....	<b>3</b>
<b>1.1 PROJECT OVERVIEW</b> .....	<b>3</b>
<b>1.2 APPLICATION PROCESS OVERVIEW</b> .....	<b>4</b>
<b>1.3 PURPOSE OF THIS REPORT</b> .....	<b>4</b>
<b>1.4 CHANGES TO THE PROPOSAL AS EXHIBITED</b> .....	<b>4</b>
<b>PART 2 ANALYSIS OF SUBMISSIONS</b> .....	<b>6</b>
<b>2.1 SUBMISSIONS PROCESS</b> .....	<b>6</b>
<b>2.2 SUBMISSIONS RECEIVED</b> .....	<b>6</b>
<b>2.3 SUBMISSION TOPICS</b> .....	<b>6</b>
<b>PART 3 ACTIONS TAKEN SINCE EXHIBITION</b> .....	<b>8</b>
<b>3.1 PROJECT REFINEMENT</b> .....	<b>8</b>
<b>3.2 FURTHER ASSESSMENT</b> .....	<b>8</b>
<b>3.2.1 Landscaping</b> .....	<b>8</b>
<b>3.2.2 Traffic</b> .....	<b>9</b>
<b>3.2.3 Flood</b> .....	<b>10</b>
<b>3.2.4 Noise</b> .....	<b>13</b>
<b>PART 4 RESONSE TO SUBMISSIONS</b> .....	<b>16</b>
<b>4.1 SUMMARY OF SUBMISSION TOPICS</b> .....	<b>16</b>
<b>4.2 PREPARATION OF ADDITIONAL STUDIES</b> .....	<b>16</b>
<b>4.2.1 Flood Risk</b> .....	<b>16</b>
<b>4.2.2 Strategic Planning</b> .....	<b>17</b>
<b>4.2.3 Statutory Planning</b> .....	<b>17</b>
<b>PART 5 UPDATED PROJECT JUSTIFICATION</b> .....	<b>19</b>
<b>5.1 SUPPORTS STATE, REGIONAL AND LOCAL PLANNING OBJECTIVES</b> .....	<b>19</b>
<b>5.2 DEMONSTRATES AND APPROPRIATE USE OF A PERMISSIBLE DEVELOPMENT</b> .....	<b>20</b>
<b>5.3 MINIMISES ENVIRONMENTAL EFFECTS</b> .....	<b>20</b>
<b>5.4 CREATES COMPATIBILITY WITH SURROUNDING DEVELOPMENT</b> .....	<b>20</b>
<b>5.5 DELIVERS ECOLOGICALLY SUSTAINABLE DEVELOPMENT</b> .....	<b>20</b>
<b>5.6 SUMMARY AND CONCLUSION</b> .....	<b>20</b>
<b>APPENDIX A UPDATED PROJECT DESCRIPTION</b> .....	<b>22</b>
<b>APPENDIX B SUBMISSIONS REGISTER</b> .....	<b>25</b>
<b>APPENDIX C MITIGATION MEASURES TABLE</b> .....	<b>30</b>
<b>APPENDIX D SUPPORTING DOCUMENTS</b> .....	<b>37</b>



**SUBMISSIONS REPORT**

**FIGURES**

**Figure 1. Updated Ground Floor Plan (Source: Nettletontribe, August 2024)..... 5**

**Figure 2. Existing 1% AEP Flood Hazard (Figure 5 in Flood Assessment Addendum) (Source: TTW, 2024) 10**

**Figure 3. Post Development 1% AEP Flood Hazard (Figure 8 in Flood Assessment Addendum) (Source: TTW, 2024)..... 11**

**Figure 4. Flooded Area Considered for Volume Calculation in the Previous Stage (Figure 9 in Flood Assessment Addendum) (Source: TTW, 2024) ..... 12**

**Figure 5. Updated Long Section Views for the Proposed Storage Areas (Figure 13 in Flood Assessment Addendum) (Source: TTW, 2024) ..... 13**

**Figure 6. Traffic Generation Site Area (Source: Acoustic Works, 2024)..... 14**

**TABLES**

**TABLE 1. CATEGORIES OF SUBMISSIONS ..... 7**

**TABLE 2: TOTAL TRIP GENERATION..... 9**

**TABLE 3: TRIP DISTRIBUTION (CARS)..... 9**

**TABLE 4: TOTAL TRIP GENERATION..... 14**

**TABLE 5: ROAD TRAFFIC NOISE AT NEAREST RESIDENTIAL RECEIVERS..... 15**

**TABLE 2: SITE DETAILS ..... 18**

**APPENDICES LIST**

**Appendix A** Updated Project Description

**Appendix B** Submissions Register

**Appendix C** Updated Mitigation Measures

**Appendix D** Supporting Documents

**Appendix D1** Comprehensive Response Matrix

**Appendix D2** Section 88B Instrument for Lot Amalgamation

**Appendix D3** Updated Architectural Drawings

**Appendix D4** Updated Landscape Plans

**Appendix D5** Traffic Response Statement and SIDRA Files

**Appendix D6** Flood Response to Submissions

**Appendix D7** Flood Emergency Response Plan

**Appendix D8** Noise Impact Assessment Addendum



## SUBMISSIONS REPORT

Kelso Crescent Multi-Level Warehouse, Moorebank  
20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

## EXECUTIVE SUMMARY

This Submissions Report has been prepared on behalf of Mapletree SR Australia Management Pty Ltd (the Applicant) to address the relevant matters raised during the exhibition of the State Significant Development (SSD) of the Kelso Crescent Multi-Level Warehouse, Moorebank (**SSD-58978472**).

This Submissions Report has been prepared in response to the matters raised by consulted parties. To address the matters raised during public exhibition, the proposal has undergone design refinements and additional assessment.

**SSD-58978472** was exhibited from 4 June to 1 July 2024, during which a number of submissions were provided to the NSW Department of Planning, Housing and Infrastructure (DPHI) from the following agencies and authorities:

- DPHI;
- Endeavour Energy;
- Environment Protection Authority;
- NSW Fire and Rescue;
- Heritage NSW;
- Heritage NSW – Aboriginal;
- Sydney Water;
- Transport for New South Wales;
- Water NSW;
- Department of Climate Change, Energy, the Environment and Water; and
- Liverpool City Council.

In addition, two (2) community submissions were received from neighbouring occupiers relating to traffic effects on the local road network.

Since exhibition, the Applicant has:

- Refined the project;
- Undertaken further assessment of the impacts of the project; and
- Prepared further supporting studies.

## PROJECT REFINEMENT

Following the exhibition phase, and upon review of all submissions received, several amendments have been made to the proposal. It is noted that these amendments have also captured changes resulting from more detailed design.

These amendments can be summarised as:

- Tree T16 is retained at the southern boundary (Seton Road interface);
- Vehicle sight lines from the two-way ramp serving the basement car parking are improved, and the entry/ exit enlarged;



## SUBMISSIONS REPORT

Kelso Crescent Multi-Level Warehouse, Moorebank

20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

- 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 3,560m<sup>2</sup> (10.1% coverage) to 4,500m<sup>2</sup> (12.73% coverage);
- A chamfered/ curved building profile is introduced to the main warehouse structure, which is distinguishable from the northern and southern elevations;
- 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;
- The estate entry sign is reduced from a height of 10.04m to 5m and now forms a combined estate entry and truck entry/ exit signage element; and
- A minor reduction in the outdoor amenity area serving the ancillary office accommodation at the Kelso Crescent interface.

## FURTHER ASSESSMENT

In response to the received submissions, the following further assessments have been undertaken:

- **Traffic** with an Addendum to the previous assessment enclosed at **Appendix D5**;
- **Flood** with an Addendum to the previous assessment enclosed at **Appendix D6**; and
- **Noise** with an Addendum to the previous assessment enclosed at **Appendix D8**.

## FURTHER ASSESSMENT

In response to the received submissions, the following further studies have been completed:

- A Flood Emergency Response Plan, which is enclosed at **Appendix D7**.

## JUSTIFICATION

This Submissions Report has responded to the key matters raised by the respondents in relation to the proposed development of the Kelso Crescent Multi-Level Warehouse (**SSD-58978472**).

The proposed development is justified on environmental, social, and economic grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the subject site from an otherwise underutilised landholding to a productive employment-generating facility, and which is cognisant to the surrounding industrial environment.

The refinements and clarifications made within this Submissions Report are changes that fit within the limits set by the proposal. The proposal (including minor design refinements and clarifications) is considered acceptable in relation to the following economic, environmental, and social considerations.

Overall, the proposed development, as described in this Submissions Report is considered in the public interest and should be approved by DPHI, subject to appropriate conditions of consent.



## PART 1 INTRODUCTION

### 1.1 PROJECT OVERVIEW

The development proposed under **SSD-58978472** involves the construction and operation of a new warehouse and distribution centre (identified as the Kelso Crescent Multi-Level Warehouse, Moorebank), to be delivered by Mapletree SR Australia Management Pty Ltd, comprising:

- Amalgamation of Lot 2 in DP 521146 and Lot C in DP 327378;
- Removal of five (5) subterranean fuel tanks and a subterranean oil/ water separator;
- Main construction site preparation works, including the removal of 33 trees;
- Earthworks to achieve an FFL of RL 10.00 (+/-500mm);
- Provision of infrastructure comprising civil works and utilities servicing;
- Construction of five (5) warehouse buildings, split over two (2) storeys with ramp-up access, comprising:
  - Warehouse 1 at ground level – 5,700m<sup>2</sup>
  - Warehouse 2 at ground level – 5,820m<sup>2</sup>
  - Warehouse 3 at ground level – 5,820m<sup>2</sup>
  - Warehouse 4 at first floor – 11,530m<sup>2</sup>
  - Warehouse 5 at first floor – 5,820m<sup>2</sup>
  - Total Warehousing – 34,690m<sup>2</sup>
- Ancillary office accommodation totalling 2,400m<sup>2</sup>;
- Multi-level car parking (118 spaces) off Kelso Crescent at the front of the subject site, subterranean car parking (62 spaces) off Seton Road at the rear of the subject site, and a total of 38 loading docks across the two (2) storeys of warehousing;
- Onsite cycle parking and end of trip facilities;
- Complementary landscaping and offset planting comprising 4,500m<sup>2</sup>, providing 12.73% coverage;
- Business identification signage zones; and
- Allowance for operations up to 24 hours per day, seven (7) days per week.

The proposed development is to be located at 20 Kelso Crescent, Moorebank, more formally described as Lot 2 in DP 521146 and Lot C in DP 327378. Such land is described throughout this Submissions Report as the 'subject site'.

The subject site is located within the Liverpool Local Government Area (LGA) and is zoned E4 General Industrial pursuant to the *Liverpool Local Environmental Plan 2008* (LLEP 2008). The proposed development falls within the definition of a 'warehouse or distribution centre', which is permissible with consent in the E4 General Industrial zone of the LLEP 2008.

The proposal satisfies the definition of State Significant Development (SSD) pursuant to Schedule 1, Clause 12 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP), being development for "the purpose of warehouses or distribution centres (including container storage facilities) at one location and related to the same operation" with an Estimated Development Cost (EDC) of more than \$50 million.



## 1.2 APPLICATION PROCESS OVERVIEW

Development consent is being sought for the proposal, as SSD, under Division 4.1, Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). In accordance with section 89F of the EP&A Act and the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), the EIS for the proposal is required to be placed on exhibition for not less than 30 days. The proposal was exhibited from 4 June to 1 July 2024, during which a number of submissions were provided to the NSW Department of Planning, Housing and Infrastructure (DPHI), as discussed herein.

No submissions have been received outside the exhibition period.

## 1.3 PURPOSE OF THIS REPORT

The purpose of this Submissions Report is to detail and respond to matters raised in the submissions received for **SSD-58978472**.

The Submissions Report has been set out to address each submission matter, and is structured in accordance with the *SSD Guidelines – Preparing a Submissions Report*, as follows:

- PART 1** provides an overview of the project, the application process and the Submissions Report purpose and structure;
- PART 2** provides an analysis of the submissions received;
- PART 3** provides an overview of the actions taken since exhibition of the project;
- PART 4** provides responses to each of the issues raised in the submissions received;
- APPENDIX A** provides an updated project description (as relevant);
- APPENDIX B** provides a summary of the submissions received;
- APPENDIX C** provides a revised set of project management and mitigation measures, following the review of submissions and technical responses;
- APPENDIX D** provides copies of any supporting information required by the received submissions.

## 1.4 CHANGES TO THE PROPOSAL AS EXHIBITED

Following the exhibition phase, and upon review of all submissions received, several amendments have been made to the proposal. It is noted that these amendments have also captured changes resulting from more detailed design. The updated site plan is shown in **Figure 1** and the changes are further explained in **PART 3** of this Submissions Report.

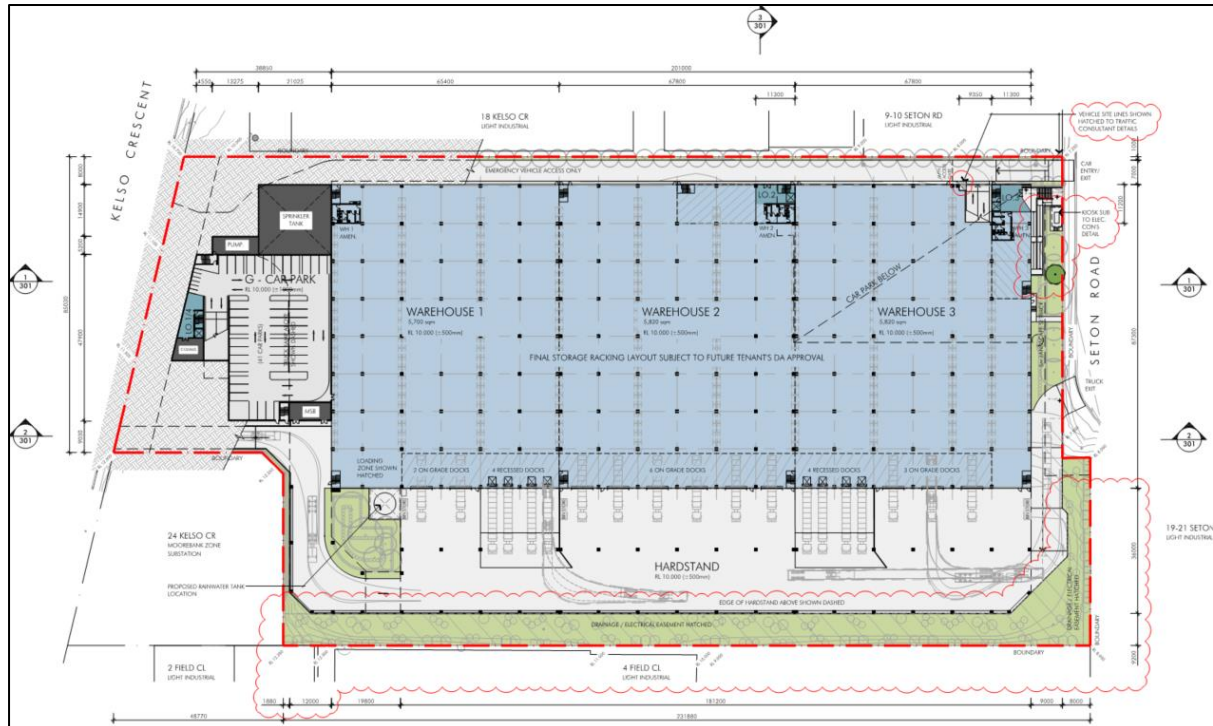


## SUBMISSIONS REPORT

Kelso Crescent Multi-Level Warehouse, Moorebank

20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472



**Figure 1. Updated Ground Floor Plan** (Source: Nettletontribe, August 2024)

Such amendments include:

- Tree T16 is retained at the southern boundary (Seton Road interface);
- Vehicle sight lines from the two-way ramp serving the basement car parking are improved, and the entry/ exit enlarged;
- 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 3,560m<sup>2</sup> (10.1% coverage) to 4,500m<sup>2</sup> (12.73% coverage);
- A chamfered/ curved building profile is introduced to the main warehouse structure, which is distinguishable from the northern and southern elevations;
- 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;
- The estate entry sign is reduced from a height of 10.04m to 5m and now forms a combined estate entry and truck entry/ exit signage element; and
- A minor reduction in the outdoor amenity area serving the ancillary office accommodation at the Kelso Crescent interface.



## **PART 2 ANALYSIS OF SUBMISSIONS**

### **2.1 SUBMISSIONS PROCESS**

The proposal was exhibited from 4 June to 1 July 2024, during which a number of submissions were provided to the NSW DPE.

Section 59(2) of the EP&A Regulation permits the Planning Secretary of the NSW DPE to request that the Applicant to provide a written response in relation to the issues raised within any submissions made during public exhibition. This Submissions Report aims to fulfil the request from the Planning Secretary.

Submissions received outside the exhibition period have also been addressed in this Submissions Report.

### **2.2 SUBMISSIONS RECEIVED**

A total of thirteen (13) submissions were received during the exhibition period. Of these submissions ten (10) were received from government agencies, and three (3) from other stakeholders, as summarised below:

#### **Government Agencies:**

- DPHI;
- Environment Protection Authority;
- NSW Fire and Rescue;
- Heritage NSW;
- Heritage NSW – Aboriginal;
- Sydney Water;
- Transport for New South Wales;
- Water NSW;
- Department of Climate Change, Energy, the Environment and Water; and
- Liverpool City Council.

#### **Other Stakeholders:**

- Endeavour Energy;
- Yenstate Pty Ltd (public submission from neighbouring occupier); and
- Unknown public submission from neighbouring occupier.

Of the thirteen (13) submissions, the following is noted:

- Six (6) submissions provide support, no comment and/ or conditions of consent; and
- Seven (7) submissions provide comment and request additional information.

### **2.3 SUBMISSION TOPICS**

This section provides a general overview of the categories of matters raised by the abovementioned respondents, including commentary on where the relevant matters are addressed in this Submissions



**SUBMISSIONS REPORT**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

Report. These categories are arranged as recommended by the *SSD Guidelines - Preparing a Submissions Report*.

<b>TABLE 1. CATEGORIES OF SUBMISSIONS</b>		
<b>Category</b>	<b>Subcategory</b>	<b>Addressed at:</b>
The Project	Design and Built Form	<b>Appendix D1</b>
	Landscaping	<b>Section 3.3.1</b>
	Regulatory Compliance	<b>Appendix D1</b>
The Economic, Environmental and Social Impacts of the Project	Transport, Parking and Accessibility	<b>Section 3.3.2</b>
	Noise	<b>Section 3.3.4</b>
	Ground Conditions	<b>Appendix D1</b>
	Flood Risk	<b>Section 3.3.3</b> <b>Section 4.2.1</b>
	Strategic Planning	<b>Section 4.2.2</b>
Procedural Matters	Statutory Planning	<b>Section 4.2.3</b>



## **PART 3    ACTIONS TAKEN SINCE EXHIBITION**

The following subsections summarise the actions the Applicant has taken since the public exhibition to address the issues raised in submissions, including:

- Refining or amending the project; and
- Undertaking further assessment of the impacts of the project; and

### **3.1    PROJECT REFINEMENT**

As indicated in **Section 1.4**, the proposal has been refined following exhibition, particularly in response to the matters raised by Liverpool City Council and DPHI. The project improvements include:

- Tree T16 is retained at the southern boundary (Seton Road interface);
- Vehicle sight lines from the two-way ramp serving the basement car parking are improved, and the entry/ exit enlarged;
- 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 3,560m<sup>2</sup> (10.1% coverage) to 4,500m<sup>2</sup> (12.73% coverage);
- A chamfered/ curved building profile is introduced to the main warehouse structure, which is distinguishable from the northern and southern elevations;
- 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;
- The estate entry sign is reduced from a height of 10.04m to 5m and now forms a combined estate entry and truck entry/ exit signage element; and
- A minor reduction in the outdoor amenity area serving the ancillary office accommodation at the Kelso Crescent interface.

### **3.2    FURTHER ASSESSMENT**

#### **3.2.1    Landscaping**

The Landscape Plan has been updated by Geoscapes and is enclosed at **Appendix D4** of this RTS Report. This incorporates the aforementioned project refinements that have resulted in the overall landscaped area within the proposed development increasing from 3,560m<sup>2</sup> (10.1% coverage) to 4,500m<sup>2</sup> (12.73% coverage).

With respect to the agency advice provided by Endeavour Energy:

- regarding the planting adjacent to the Moorebank Zone Substation, Geoscapes received written (email) correspondence from Endeavour Energy advising that planting of 1-2m mature height vegetation or hedging would not be of any concern.
- regarding the padmount substation along Kelso Crescent, Geoscapes note the slight encroachment of the tree, which has duly been relocated. Please refer to **Landscape Masterplan SSD-01** and **Landscape Detail Plan SSD-02** forming part of the updated Landscape Plan enclosed at **Appendix D4**.
- The trees that encroach the padmount substation along Seton Road have been removed. Please refer to **Landscape Masterplan SSD-01** and **Landscape Detail Plan SSD-03** forming part of the updated Landscape Plan enclosed at **Appendix D4**.



## SUBMISSIONS REPORT

Kelso Crescent Multi-Level Warehouse, Moorebank  
20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

With respect to the comment received from DPHI regarding 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, this has been revised to incorporate more resilient species for shade conditions. Please refer to **Landscape Detail Plan SSD-03** and **Plant Schedule SSD-12** enclosed at **Appendix D4**.

### 3.2.2 Traffic

An Addendum to the Transport Impact Assessment has been prepared by Genesis Traffic and is enclosed at **Appendix D5** of this RTS Report.

The intersection performance of Newbridge Road and Kelso Crescent has been reassessed using 0.52 vehicles per hour (vtp) during the AM peak and 0.56 vtp during the PM peak as a basis. The warehouse with a total GFA of 34,410m<sup>2</sup> is now projected to generate the following traffic movements:

TABLE 2: TOTAL TRIP GENERATION			
Period	AM Peak (vtp)	PM Peak (vtp)	Daily (vpd)
<b>Total</b>	<b>179</b>	<b>193</b>	<b>1,583</b>
<b>Cars (77%)</b>	138	149	1,219
<b>Trucks (23%)</b>	41	44	364

Applying the same distribution proportions for each direction, **TABLE 3** below summarises the revised car movements to and from the subject site in each direction.

TABLE 3: TRIP DISTRIBUTION (CARS)					
Cars		AM Peak		PM Peak	
		In (80%)	Out (20%)	In (80%)	Out (20%)
Direction	Total Trips	<b>110</b>	<b>28</b>	<b>30</b>	<b>119</b>
	Proportion				
<b>North</b>	21%	23	6	6	25
<b>East</b>	14%	15	4	4	17
<b>South</b>	22%	24	6	7	26
<b>West</b>	43%	47	12	13	51

The updated SIDRA results are presented within the Transport Impact Assessment Addendum (**Appendix D5**). The SIDRA analysis demonstrates the following:

- 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.



## SUBMISSIONS REPORT

Kelso Crescent Multi-Level Warehouse, Moorebank  
20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

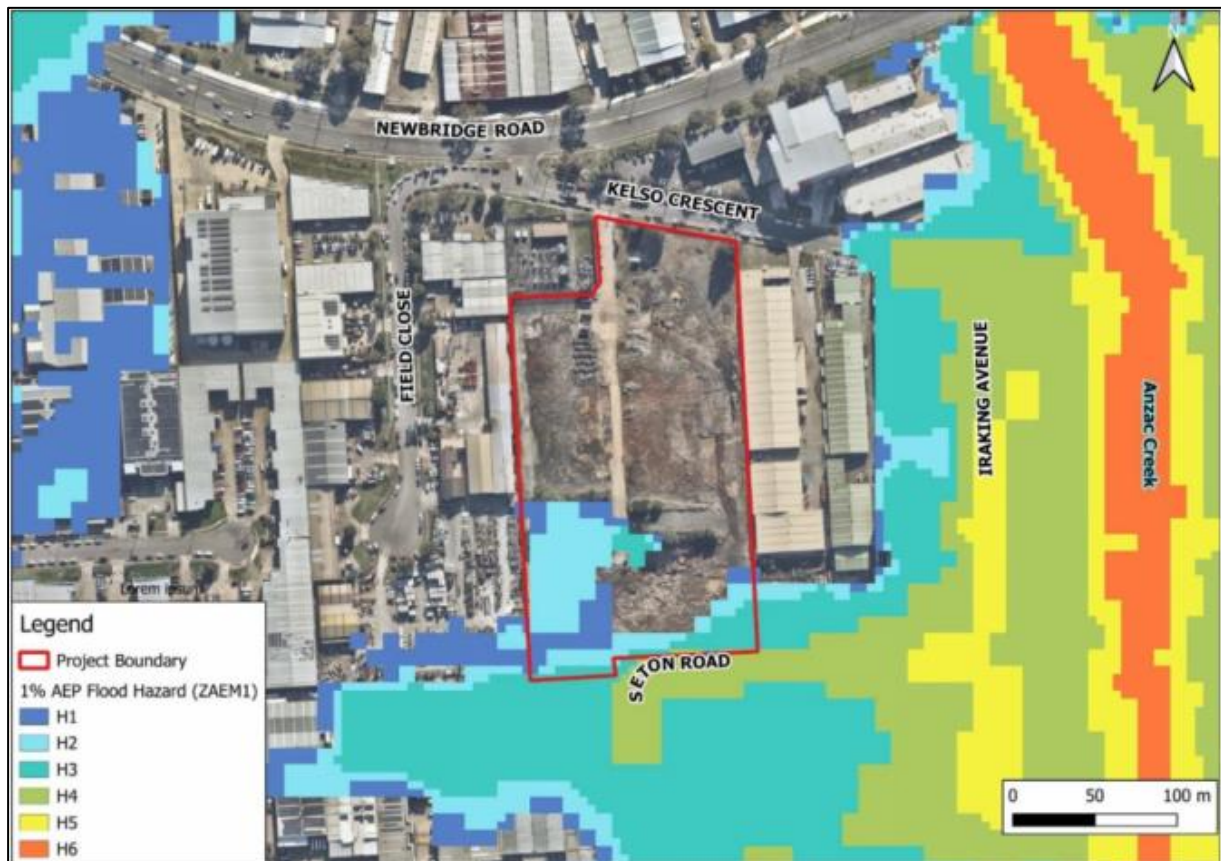
SSD-58978472

### 3.2.3 Flood

An Addendum to the Flood Assessment has been prepared by TTW and is enclosed at **Appendix D6** of this RTS Report.

In response to feedback from Liverpool City Council and the Department of Climate Change, Energy, the Environment and Water (BCS), *The Georges River Flood Study – Final Draft (January 2020)* has been used to develop the existing model. The new topographical survey data for the subject site has been integrated into the model, and the existing building located to the south of the development has been removed from the model.

Figures 3, 4 and 5 within the enclosed Flood Assessment Addendum illustrate the existing flood depths, levels, flow velocities, and hazards for the 1% AEP storm event. The updated results are consistent with the Anzac Creek model used in the originally submitted Flood Risk Assessment, which indicates a flood level of 8.46m AHD at the southern boundary of the subject site, velocities generally below 0.5m/s, and flood hazards along the southern boundary at Seton Road classified as H3 and H4.

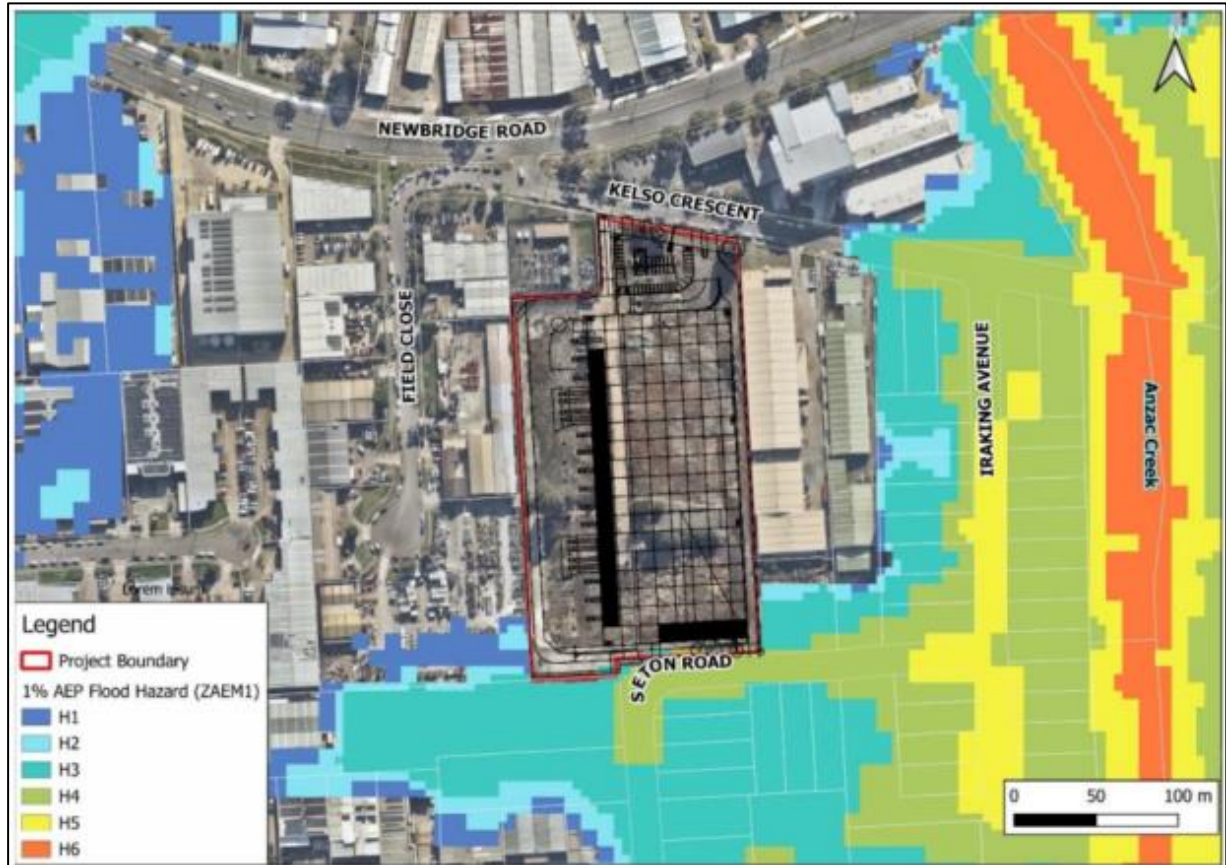


**Figure 2. Existing 1% AEP Flood Hazard (Figure 5 in Flood Assessment Addendum)** (Source: TTW, 2024)

The post-development flow depths and levels, velocity, and hazard for the 1% AEP are presented in Figures 6, 7 and 8 within the enclosed Flood Assessment Addendum. The updated results are consistent with the original modelling, demonstrating a proposed flood level of 8.46m AHD at the southern boundary of the subject site. Additionally, the proposed development would have no significant impact on surrounding properties as the flood storage displaced is negligible compared to the extensive capacity of the floodplain.



**SUBMISSIONS REPORT**



**Figure 3. Post Development 1% AEP Flood Hazard (Figure 8 in Flood Assessment Addendum)**  
(Source: TTW, 2024)

At the initial stage of the project, calculations using the GIS package estimated that the existing flooded area within the proposed development site covers approximately 9,225m<sup>2</sup>, containing approximately 7,500m<sup>3</sup> of floodplain volume. **Figure 4** illustrates the flooded area under the existing condition, which was used for these calculations.





**Figure 4. Flooded Area Considered for Volume Calculation in the Previous Stage (Figure 9 in Flood Assessment Addendum) (Source: TTW, 2024)**

A more precise calculation has been conducted using 12d software to determine the difference between the design surface level and the 1% AEP flood level. This reveals that the total flood storage occupied by the proposed development is 3,350m<sup>3</sup>.

In accordance with the *Liverpool Development Control Plan 2008* (LDCP 2008), compensatory excavation needs to be provided to ensure that there is no net loss of floodplain storage volume below the 1% AEP flood. The civil design of the proposed development has subsequently been modified to provide the required storage volume. Two (2) storage areas are proposed:

- The first area where flood storage has been increased is along the emergency vehicle driveway. The driveway grade has been lowered to 1% to ensure greater capacity under the flood level. This enables 414m<sup>3</sup> of additional storage capacity.
- The second area where flood storage has been increased is under the suspended slab of Level 1. Excavation to approximately RL 6.00 is required, with a 1% grade excavated to the northern portion of the suspended slab until the flood level at RL 8.46, allowing for additional capacity under the flood level. This enables 2,952m<sup>3</sup> of additional storage capacity.

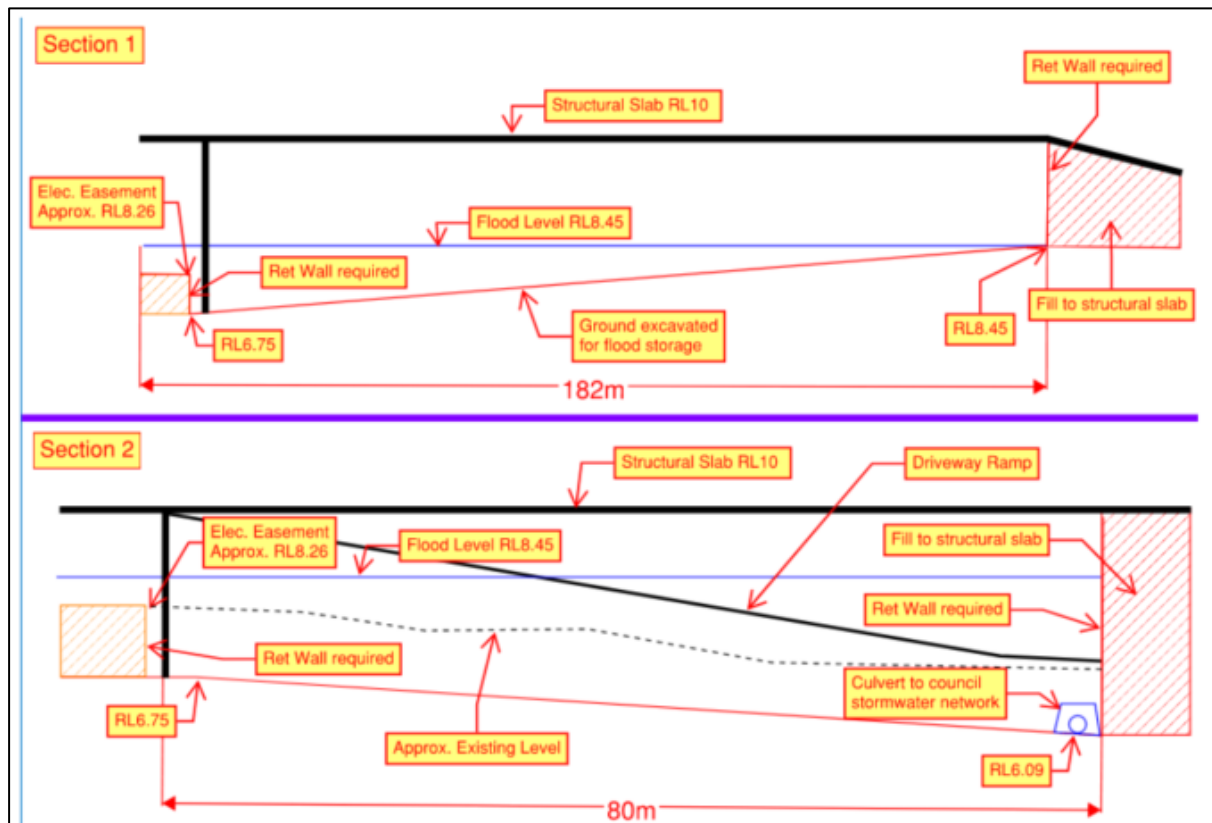
See Figure 5 below for an illustration of these additional storage areas, which total 3,366m<sup>3</sup>:



## SUBMISSIONS REPORT

Kelso Crescent Multi-Level Warehouse, Moorebank  
20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472



**Figure 5. Updated Long Section Views for the Proposed Storage Areas (Figure 13 in Flood Assessment Addendum)** (Source: TTW, 2024)

A post-development flood impact assessment has also been completed for this study. The results demonstrate no impact on surrounding properties during the 1% AEP storm event.

With respect to the PMF event, this impacts the entire area, with only a flood island remaining to the north-west of the subject site. The flood depth is generally above 1m, with the flood level approximately 12.12m AHD. The velocity is typically less than 0.5m/s, and the hazard is predominantly categorised as H4 and H5.

### 3.2.4 Noise

An Addendum to the Noise Impact Assessment has been prepared by Acoustic Works and is enclosed at **Appendix D8** of this RTS Report.

In the originally submitted Noise Impact Assessment, it is noted that the surrounding road network (Newbridge Road and Moorebank Avenue), which is in proximity to sensitive receivers, carries the following upper limit traffic volumes:

- Newbridge Road – 114,736 vehicles per day
- Moorebank Avenue – 48,291 vehicles (7% heavy vehicles) per day
- Heathcote Road – 29,460 vehicles (7% heavy vehicles) per day

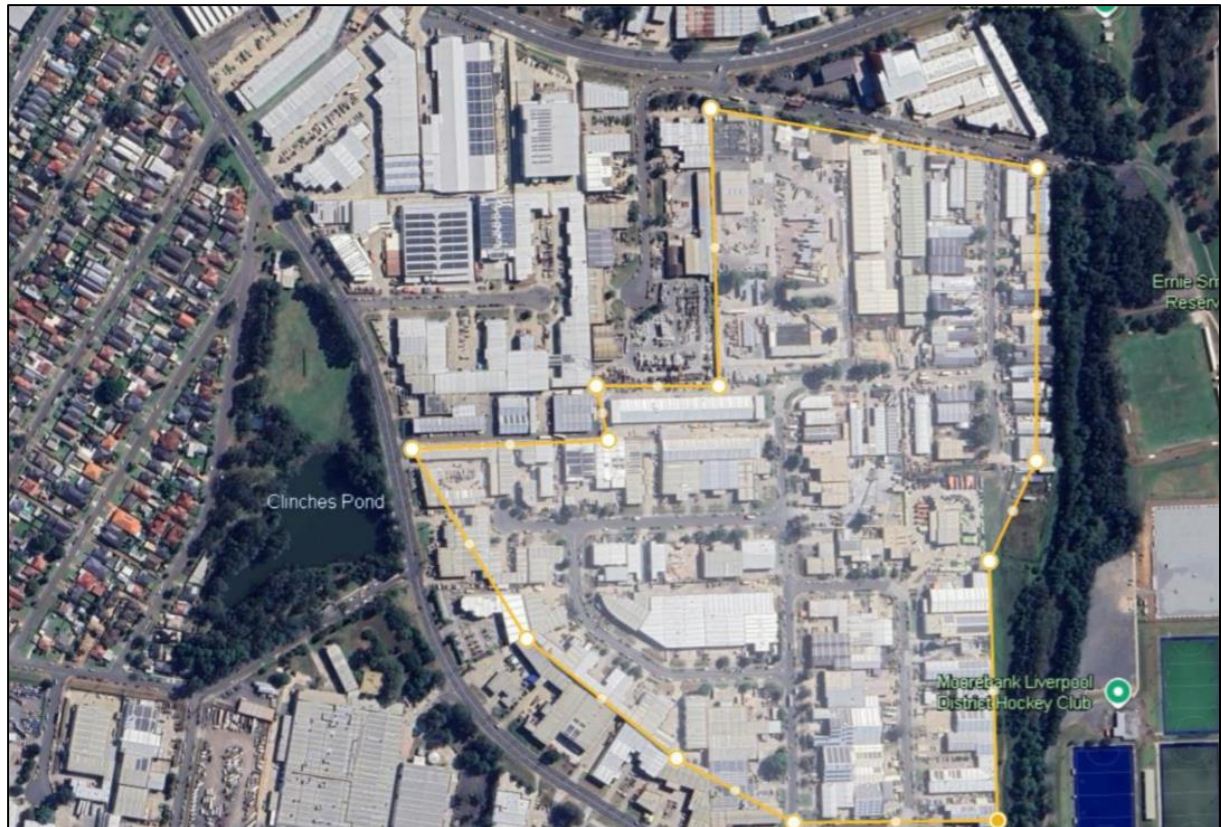
Further analysis was undertaken to determine compliance with the criteria based on transport routes from the subject site to sensitive receivers based on the following information provided by Genesis Traffic.

The subject site is predicted to generate the following traffic volumes as provided by Genesis Traffic:

**SUBMISSIONS REPORT**

<b>TABLE 4: TOTAL TRIP GENERATION</b>			
<b>Period</b>	<b>AM Peak (vtph)</b>	<b>PM Peak (vtph)</b>	<b>Daily (vpd)</b>
<b>Total</b>	<b>179</b>	<b>193</b>	<b>1,583</b>
<b>Cars (77%)</b>	138	149	1,219
<b>Trucks (23%)</b>	41	44	364

Preliminary calculations have been completed to determine the predicted traffic generation rate using the 4.6 vpd per 100m<sup>2</sup> assumption used within the Transport Impact Assessment. Based on a surrounding area of 284,238m<sup>2</sup>, the conservative traffic generation equates to 13,074 vehicles per day. Due to the area being industrial, a 23% heavy vehicle rate was used.



**Figure 6. Traffic Generation Site Area** (Source: Acoustic Works, 2024)

**TABLE 5** below provides the results of the calculation of road traffic noise with respect to the identified sensitive receivers. The assumption used in the modelling to determine compliance with the criteria for residential was based on a worst case scenario of existing traffic, including the traffic generated by the proposed development.



**SUBMISSIONS REPORT**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>TABLE 5: ROAD TRAFFIC NOISE AT NEAREST RESIDENTIAL RECEIVERS</b>							
<b>Assessed Road</b>	<b>Receiver Location</b>	<b>Current Traffic Volumes</b>	<b>Traffic Volumes Accounting for Development</b>	<b>Pre-Dev Noise Impact Leq dB(A)</b>	<b>Post Dev Noise Impact Leq</b>	<b>Complies Yes/ No</b>	<b>Resulting Increase in Noise Levels dB(A)</b>
Iraking Avenue	Jack O'Sullivan Road	13,074	14,657	47.1	47.6	Yes with LAeq15h 55dB(A) Day and 50dB(A) night	0.5
Kelso Avenue	Whelan Avenue	13,074	14,657	43.2	43.7	Yes with LAeq15h 55dB(A) Day and 50dB(A) night	0.4
Heathcote Road	Heathcote Road Western Residential	29,460	31,043	72.4	72.6	No	0.2
Newbridge Road	Newbridge Road Northern Residential	114,736	116,319	76.9	77	No	0.1

The results at **TABLE 5** demonstrate that the worst case scenario traffic generation would comply with the criteria at the nearest residential receivers. The proposed development's traffic generation based on existing traffic volumes is predicted to be less than the 2dB(A) criteria stated at Section 3.4 of the *NSW Road Noise Policy 2011*, and duly satisfies the assessment requirements.



## **PART 4    RESONSE TO SUBMISSIONS**

### **4.1    SUMMARY OF SUBMISSION TOPICS**

**Appendix D1** provides a detailed matrix of all matters raised by each respondent and, where relevant, how and where the matters have been responded to. This includes responses to requests for further information and addressing matters of clarification.

Where further or refined assessment work has been undertaken, this is summarised at **Part 3**.

Where additional studies have been requested, this is summarised at **Section 4.2** below.

The following is also noted:

- Updates to management and/ or mitigation measures are documented at **Appendix C**; and
- Updates to supporting technical assessments are also included at **Appendix D**.

### **4.2    PREPARATION OF ADDITIONAL STUDIES**

#### **4.2.1    Flood Risk**

In addition to the Flood Assessment Addendum enclosed at **Appendix D6**, a Flood Emergency Response Plan (FERP) has also been prepared by TTW and is enclosed at **Appendix D7** of this RTS Report.

Further to the updated assessment summarised at **Section 3.3.3**, in the 1% AEP event, the subject site becomes inundated within 25 hours of the onset of the storm. Seton Road is affected by H3 and H4 flows (unsafe for people and vehicles) after 22.5 hours.

During the PMF event, the subject site is affected by flooding within 7.5 hours of the onset of the critical-duration storm, and key roads connecting to the subject site become inundated within 5 to 5.5 hours. The subject site is almost fully flooded after 9 hours, with only a small part of its northern portion not impacted during the PMF event. All surrounding roads including Seton Road, Kelso Crescent, and Iraking Avenue are impacted by a H5 hazard after 20 hours of the onset of a PMF event.

An analysis of hydraulic model outputs demonstrates that floodwaters reach their maximum level 32 hours after the onset of the PMF event, then begin to recede following the peak. The recession process is predicted to take approximately 18 hours. As the subject site would be fully evacuated, the longest duration of inundation during a PMF event was not determined in this study. Additionally, a 1% AEP inundation assessment was not conducted as the FERP is required only for the PMF event, given that this is the worst-case scenario.

The FERP enclosed at **Appendix D7** addresses the critical risk factors identified by the NSW SES, the Biodiversity Conservation Science (BCS) Group, and supporting flood management agencies. Considering the subject site's potential for prolonged isolation and significant inundation during a PMF event, the FERP emphasises the importance of pre-emptive evacuation as the primary strategy to mitigate the hazards posed by floodwaters.



The FERP includes detailed protocols and designated evacuation routes, with the preferred route from the subject site leading via Seton Road to Heathcote Road and then onto the M5 Highway, providing eastbound travel on the M5 and westbound travel via Camden Valley. Additionally, the use of the M5 and M7 enables safe evacuation to designated shelters, such as the Homebush Evacuation Centre. Co-ordination with the NSW SES and alignment with regional plans, including the Georges River and Woronora River Valley Flood Emergency Sub Plan, further strengthen the operational framework for evacuation.

Key site-specific protocols for the proposed development include the mandatory induction and safety training for all staff, equipping them with the knowledge and responsibilities required to respond to flood events. In addition, the 12-hour warning lead time from the Bureau of Meteorology provides a critical buffer to effectively mobilise evacuation efforts. Evacuation modelling confirms the feasibility of a full evacuation within 4.75 hours, providing a surplus margin to ensure thorough response measures.

In alignment with NSW SES guidance, the FERP leverages early warning and proactive evacuation protocols to reduce pressure on emergency resources and prioritise safety. The Site Manager will monitor flood triggers closely, while the NSW SES will oversee and control evacuation operations, co-ordinating with local emergency agencies to support seamless execution.

The FERP ensures that the proposed development can respond effectively to the challenges of flooding. Continuous reviews and updates to the FERP, alongside collaboration with the NSW SES and other stakeholders, will ensure its effectiveness in addressing the risks associated with the Georges River floodplain.

#### **4.2.2 Strategic Planning**

The *Liverpool Industrial and Employment Land Strategy* guides the retention, improvement, rezoning and development of employment lands in the Liverpool Local Government Area over the next 20 years. The Strategy considers a variety of metropolitan and local level policy and incorporates the findings of a suite of recent employment lands studies. The Strategy forms part of the evidence base informing the preparation of the Liverpool Local Environmental Plan Review discussed at Section 4.1.3.1 of the EIS.

The Industrial and Employment Lands Strategy considers that the current E4 General Industrial zone has imprecise objectives, and a broad range of permissible land uses which result in a lack of definition and a confused economic role. The zone objectives are very broad and non-specific, allowing for a range of industrial and warehouse uses.

The Strategy envisions that the E4 zone should be applied to preserve mid-size operators and large, low-impact operations including warehousing, processing and manufacturing. Distribution, logistics, transport and postal operators should be encouraged in the E4 zone precincts where they have good and direct access onto motorways or freight rail. More intrusive operators such as waste recycling, extractive industries, chemical production and refining and other hazardous and offensive industries should be encouraged to occupy lands within the E5 Heavy Industrial zone.

The envisaged use of the proposed development for warehousing, distribution and logistical operations fully accords with the aspirations and objectives of the *Liverpool Industrial and Employment Land Strategy*.

#### **4.2.3 Statutory Planning**

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.

The Section 88B Instrument for Lot Amalgamation is now enclosed at **Appendix D2** of this Response to Submissions package.



**SUBMISSIONS REPORT**

Clause 4.1 of the LLEP 2010 refers to 'Minimum Subdivision Lot Size' and requires that the size of any lot resulting from a subdivision of land to which this clause applies is not to be less than the minimum size shown on the Lot Size Map in relation to that land. The applicable minimum lot size is 2,000m<sup>2</sup>.

The current configuration of the subject site is as follows:

<b>TABLE 6: SITE DETAILS</b>		
<b>Address</b>	<b>Lot/DP</b>	<b>Lot Area</b>
20 Kelso Crescent (western portion)	Lot 2 in DP 521146	15,501m <sup>2</sup>
20 Kelso Crescent (eastern portion)	Lot C in DP 327378	19,698m <sup>2</sup>

The proposed amalgamation of Lot 2 in DP 521146 and Lot C in DP 327278 would result in a combined, overall site area of 35,199m<sup>2</sup>, which complies with Clause 4.1 of the LLEP 2010.



## **PART 5    UPDATED PROJECT JUSTIFICATION**

This Submissions Report has responded to the key matters raised by respondents in relation to the proposed development of the Kelso Crescent Multi-Level Warehouse, Moorebank (**SSD-58978472**).

The proposed development is justified on environmental, social, and environmental grounds and is compatible with the locality in which it is proposed. The proposed development would enhance the subject site transforming it from an otherwise underutilised landholding to a productive employment-generating facility.

The refinements and clarifications made within this Submissions Report are changes that fit within the limits of the project description. These refinements do not change the scope of development, and therefore an amendment to the proposal is not required. The proposal (including the minor design refinements and clarifications) is considered acceptable in relation to the following economic, environmental, and social considerations detailed below.

This Submissions Report seeks to provide an updated justification and evaluation, as required, for the proposal as a whole.

### **5.1    SUPPORTS STATE, REGIONAL AND LOCAL PLANNING OBJECTIVES**

The proposed development is consistent with the objectives, provisions and vision contained within *A Metropolis of Three Cities – Greater Sydney Region Plan*; the *Western City District Plan*; the *Liverpool Local Strategic Planning Statement 2020*; and the *Future Transport Strategy 2056*. The proposed development would contribute to employment generation in an area already earmarked for employment through both State and Regional planning policies.

The subject site forms part of the Moorebank industrial area, being identified as a significant employment precinct in the Western City District, which can be used as a base to leverage the opportunities from Western Sydney Airport, the nearby Intermodal Freight Facility, existing freight infrastructure, and inter-regional connections. These competitive advantages all provide an unprecedented opportunity for the Western City District to realise a national freight and logistics role, with enhanced productivity and a substantial provision of local jobs.

This proposed development aligns with Planning Priority W10 of the Western City District Plan, which aims to retain and manage established industrial land in Liverpool, as it seeks to reinvigorate an otherwise dated and inefficient industrial site to cater for industry advancements and best practice for warehousing and distribution, and associated land uses.

Similarly, the proposed development fully accords with Local Planning Priority 12 of Liverpool's Local Strategic Planning Statement, which recognises that the prospects for industrial and employment projects in Liverpool are "strong" given the proximity to transport links such as the M5 and M7, and large projects including the aforementioned Airport and Intermodal Freight Terminal.

In addition, the need for warehousing and distribution was given a burning platform by changes to business as usual catalysed by COVID-19. The NSW DPHI recognises warehouse and distribution centres as a type of development 'well-placed' to support the economic recovery from COVID-19. Warehouse and distribution centres were included as one infrastructure asset encouraging investment and job-generating development in NSW DPHI's Productivity Acceleration Package.



## **5.2 DEMONSTRATES AND APPROPRIATE USE OF A PERMISSIBLE DEVELOPMENT**

The proposed development would retain and contribute to the growth of new industry for the immediate locale and the wider region. The proposed development would be a highly appropriate and compatible (given its contiguousness to other existing warehousing and industrial developments) response to the strategic goals and objectives of the Moorebank industrial area, which all envisage employment-generating land uses at this location.

The permissibility of the subject site for development as a warehouse and distribution centre is prescribed by the LLEP 2008, which describes such development as permitted with consent in the E4 General Industrial zone.

The subject site's consistency with applicable regional and local strategies is demonstrated in the comprehensive environmental assessment, provided in the EIS, which includes an analysis of all potential impacts (including updates described in **Section 3.2** of this Submissions Report), which has been informed by the relevant consultant reports. Accordingly, the environmental assessment prescribes recommendations and mitigation measures (where necessary), to account for all identified potential impacts, by the proposed development. The suitability of the subject site with regard to the proposed development, can be attributed to its ready ability to provide employment, its excellent access arrangements, its suitable contextual setting, and its minimal impact on the environment.

## **5.3 MINIMISES ENVIRONMENTAL EFFECTS**

Specialist consultants have assessed the potential impacts of the proposed development, determining that it could be undertaken with minimal environmental impacts. The commissioned reports (including those updated as part of the Submissions Report) have collectively concluded that no significant risk to the locality would result from the proposed development. Where impacts have been identified, these fully developed strategies are set out in detail for management and mitigation. These measures have been revisited and updated where necessary, as addressed within **Appendix C** of this Submissions Report.

## **5.4 CREATES COMPATIBILITY WITH SURROUNDING DEVELOPMENT**

The proposed development is compatible with existing land uses on adjacent lands, all of which provide very similar industrial functions. All are within the immediate vicinity of the proposed development. Detailed investigations undertaken, as part of this application, conclude that no significant environmental cumulative impacts, would occur from the proposed facility.

As part of this Submissions Report, the 'fit' of the proposed development, within the existing context, has been further considered. The proposal has been composed to have a soft impact to the surroundings and not contend with the existing and emerging industrial atmosphere.

## **5.5 DELIVERS ECOLOGICALLY SUSTAINABLE DEVELOPMENT**

The proposal continues to align with the principles of ecologically sustainable development (ESD) as outlined in Clause 193 of the EP&A Regulation.

## **5.6 SUMMARY AND CONCLUSION**

This Submissions Report has been prepared in response to the matters raised by respondents, as described in **Section 2.2**. To address the matters raised during public exhibition, the proposal has undergone design refinements (refer to **Section 3.1**), additional assessment (refer to **Section 3.2**), and has been subject to the preparation of additional studies (refer to **Section 4.2**).



## **SUBMISSIONS REPORT**

Kelso Crescent Multi-Level Warehouse, Moorebank

20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

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Based on the findings of the original EIS and the further matters considered as part of this Submissions Report, it is concluded that the proposed development is consistent within the Objects of the EP&A Act, under Section 1.3, particularly the promotion of the orderly and economic development of the land.

The proposed development continues to comprise a quality outcome, which provides employment-generating opportunities and further delivers on the rationale of full economic utilisation and ensuring the most effective and efficient use of valuable industrial land for its intended purpose.

The proposed development is suitable and is considered orderly and appropriate, having regard to the social, cultural, economic, and environmental considerations. It is therefore recommended that the proposed development, for the purpose of a warehouse and distribution centre, is supported subject to the incorporation of relevant and appropriate conditions of development consent.



**APPENDIX A**  
**UPDATED**  
**PROJECT**  
**DESCRIPTION**



**PROJECT DESCRIPTION**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

## UPDATED PROJECT DESCRIPTION – SSD-58978472

<b>Project:</b>	State Significant Development Application (SSD-58978472) For Kelso Crescent Multi-Level Warehouse
<b>Applicant:</b>	Mapletree SR Australia Management Pty Ltd
<b>Site:</b>	20 Kelso Crescent, Moorebank Lot 2 in DP 521146 and Lot C in DP 327378

The proposed development involves the construction and operation of a warehouse and distribution centre (identified as the Kelso Crescent Multi-Level Warehouse, Moorebank) comprising:

- Amalgamation of Lot 2 in DP 521146 and Lot C in DP 327378;
- Removal of five (5) subterranean fuel tanks and a subterranean oil/ water separator;
- Main construction site preparation works, including the removal of 33 trees;
- Earthworks to achieve an FFL of RL 10.00 (+/-500mm);
- Provision of infrastructure comprising civil works and utilities servicing;
- Construction of five (5) warehouse buildings, split over two (2) storeys with ramp-up access, comprising:
  - Warehouse 1 at ground level – 5,700m<sup>2</sup>
  - Warehouse 2 at ground level – 5,820m<sup>2</sup>
  - Warehouse 3 at ground level – 5,820m<sup>2</sup>
  - Warehouse 4 at first floor – 11,530m<sup>2</sup>
  - Warehouse 5 at first floor – 5,820m<sup>2</sup>
  - Total Warehousing – 34,690m<sup>2</sup>
- Ancillary office accommodation totalling 2,400m<sup>2</sup>;
- Multi-level car parking (118 spaces) off Kelso Crescent at the front of the subject site, subterranean car parking (62 spaces) off Seton Road at the rear of the subject site, and a total of 38 loading docks across the two (2) storeys of warehousing;
- Onsite cycle parking and end of trip facilities;
- Complementary landscaping and offset planting comprising 4,500m<sup>2</sup>, providing 12.73% coverage;
- Business identification signage zones; and
- Allowance for operations up to 24 hours per day, seven (7) days per week.

Consent is sought to develop the subject site in accordance with the following plans.

REGISTER OF PROJECT PLANS			
Drawing	Title	Rev.	Date
<b>Civil Drawings</b>			
231204-TTW-00-DR-CV-00000	Cover Sheet	P5	22.03.2023
231204-TTW-00-DR-CV-00001	Notes & Legends Sheet	P5	22.03.2023
231204-TTW-00-DR-CV-00030	Erosion & Sediment Control Plan	P6	22.03.2023
231204-TTW-00-DR-CV-00031	Bulk Earthworks Plan	P7	22.03.2023
231204-TTW-00-DR-CV-00033	Bulk Earthworks Cut and Fill	P6	22.03.2023



**PROJECT DESCRIPTION**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

231204-TTW-00-DR-CV-0041	Site Works & Stormwater Plan	P7	22.03.2023
231204-TTW-00-DR-CV-00061	Cross Sections	-	22.03.2023
231204-TTW-00-DR-CV-0050	Details Sheet 1	P3	22.03.2023
231204-TTW-00-DR-CV-00051	Details Sheet 2	P3	22.03.2023
<b>Tree works &amp; Landscaping Drawings</b>			
<b>SSD-00</b>	<b>Landscape Cover Sheet</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-01</b>	<b>Landscape Plan</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-02</b>	<b>Landscape Detail Plan 1</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-03</b>	<b>Landscape Detail Plan 2</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-04</b>	<b>Landscape Detail Plan 3</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-05</b>	<b>Landscape Detail Plan 4</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-06</b>	<b>Tree Canopy Cover Plan</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-07</b>	<b>Tree Retention Plan</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-08</b>	<b>Level 1 Detail Plan</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-09</b>	<b>Landscape Sections AA &amp; BB</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-10</b>	<b>Landscape Sections CC &amp; DD</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-11</b>	<b>Specification &amp; Details</b>	<b>E</b>	<b>26.08.2024</b>
<b>SSD-12</b>	<b>Plant Schedule &amp; Imagery</b>	<b>E</b>	<b>26.08.2024</b>
<b>Architectural Drawings</b>			
12865-DA000	Cover Page (Schedule of Drawings)	F	12.12.2023
<b>12865-DA101</b>	<b>Site Plan</b>	<b>E</b>	<b>19.08.2024</b>
<b>12865-DA111</b>	<b>General Arrangement Plan - Basement</b>	<b>F</b>	<b>28.08.2024</b>
<b>12865-DA112</b>	<b>General Arrangement Plan - Ground Floor</b>	<b>G</b>	<b>28.08.2024</b>
<b>12865-DA113</b>	<b>General Arrangement Plan - Ground Floor Mez.</b>	<b>G</b>	<b>28.08.2024</b>
<b>12865-DA114</b>	<b>General Arrangement Plan - Level 1</b>	<b>F</b>	<b>19.08.2024</b>
<b>12865-DA115</b>	<b>General Arrangement Plan - Level 1 Mez.</b>	<b>E</b>	<b>19.08.2024</b>
12865-DA116	General Arrangement Plan - Roof Plan	E	12.12.2023
<b>12865-DA201</b>	<b>Building Elevations - Sheet 1</b>	<b>D</b>	<b>29.08.2024</b>
12865-DA301	Building Sections - Sheet 1	D	12.12.2023
12865-DA501	Kelso Crescent Car Park Layout	D	12.12.2023
12865-DA801	External Works - Fencing Plan	C	12.12.2023
12865-DA901	Signage Location Plan	E	
<b>12865-DA902</b>	<b>Signage Details</b>	<b>D</b>	<b>02.08.2024</b>



**APPENDIX B**  
**SUBMISSIONS**  
**REGISTER**



**SUBMISSIONS REGISTER**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>SSD-58978472 – SUBMISSIONS REGISTER</b>			
<b>Group</b>	<b>Name</b>	<b>Matters</b>	<b>Addressed</b>
Agencies / authorities	Endeavour Energy	Compliance conditions.	No further action required.
		Relationship between landscaping and existing electricity infrastructure.	<b>Section 3.2.1</b> <b>Appendix D4</b>
	Environment Protection Authority	No comment.	No further action required.
	NSW Fire and Rescue	Compliance conditions.	No further action required.
	Heritage NSW	No comment.	No further action required.
	Heritage NSW Aboriginal	Compliance conditions.	No further action required.
	Sydney Water	Compliance conditions	No further action required.
	Transport for New South Wales	Traffic generation rates.	<b>Section 3.2.2</b> <b>Appendix D5</b>
		Revised modelling recommended.	<b>Section 3.2.2</b> <b>Appendix D5</b>
		Request for SIDRA files.	<b>Appendix D5</b>
	Water NSW	No comment.	No further action required.
	Department of Climate Change, Energy, the Environment, and Water	Anzac Creek flood impacts	<b>Section 3.2.3</b> <b>Appendix D6</b>
		Anzac Creek flood risk	<b>Section 3.2.3</b> <b>Appendix D6</b>
		Georges River flooding	<b>Section 3.2.3</b> <b>Appendix D6</b>
		Evacuation constraints and emergency management	<b>Section 4.2.1</b> <b>Appendix D1</b> <b>Appendix D7</b>
		Earthworks (cut and fill)	<b>Section 3.2.3</b> <b>Appendix D6</b>
Site suitability		<b>Section 4.2.1</b> <b>Appendix D7</b>	



**SUBMISSIONS REGISTER**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>SSD-58978472 – SUBMISSIONS REGISTER</b>			
<b>Group</b>	<b>Name</b>	<b>Matters</b>	<b>Addressed</b>
	DPHI	Site consolidation	<b>Site 4.2.3 Appendix D2</b>
		Operational jobs	<b>Appendix D1</b>
		Landscaping inconsistency between Architectural and Landscape plans	<b>Appendix D3 Appendix D4</b>
		Fire access	<b>Appendix D1</b>
		View analysis: articulation and planting	<b>Section 3.1 Appendix D3</b>
		Trip generation	<b>Section 3.2.2 Appendix D5</b>
		Car parking and operational jobs	<b>Appendix D1</b>
		Vehicle manoeuvrability	<b>Appendix D1 Appendix D5</b>
		Seton Road parking	<b>Appendix D1 Appendix D5</b>
		Public transport	<b>Appendix D1</b>
		Heavy vehicle routes	<b>Appendix D1</b>
		Landscaping: planting	<b>Appendix D3 Appendix D4</b>
		Traffic noise	<b>Section 3.2.4 Appendix D8</b>
		Heavy vehicle noise	<b>Appendix D1</b>
		Consequential updates to noise assessment	<b>Section 3.2.4 Appendix D8</b>
Heritage receptor: Clinches Pond	<b>Appendix D1</b>		
Demolition: consequential updates	<b>Appendix D1</b>		
Councils	Liverpool City Council	24-hour operation	<b>Appendix D1</b>



**SUBMISSIONS REGISTER**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>SSD-58978472 – SUBMISSIONS REGISTER</b>			
<b>Group</b>	<b>Name</b>	<b>Matters</b>	<b>Addressed</b>
		Signage	<b>Appendix D1</b> <b>Appendix D3</b>
		Driveway over easement and easement relinquishment	<b>Appendix D1</b> <b>Appendix D3</b>
		Location of kiosk sub station	<b>Appendix D1</b>
		Industrial Land Strategy	<b>Section 4.2.2</b>
		Landscaping setbacks	<b>Section 3.2.1</b> <b>Appendix D4</b>
		Built form and street interface	<b>Appendix D1</b> <b>Appendix D3</b>
		Ground levels	<b>Appendix D1</b> <b>Appendix D3</b>
		Sustainability	<b>Appendix D1</b>
		Landscaping drawings	<b>Appendix D1</b>
		Tree retention	<b>Appendix D1</b> <b>Appendix D4</b>
		Safety and amenity	<b>Appendix D1</b>
		Traffic generation	<b>Section 3.2.2</b> <b>Appendix D5</b>
		Intersection assessment	<b>Section 3.2.2</b> <b>Appendix D5</b>
		Vehicular access	<b>Appendix D1</b> <b>Appendix D5</b>
		Parking provisions	<b>Appendix D1</b> <b>Appendix D5</b>
		Pedestrian crossing facilities	<b>Appendix D1</b> <b>Appendix D5</b>



**SUBMISSIONS REGISTER**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>SSD-58978472 – SUBMISSIONS REGISTER</b>			
<b>Group</b>	<b>Name</b>	<b>Matters</b>	<b>Addressed</b>
		Green Travel Plan mode share target	<b>Appendix D1</b> <b>Appendix D5</b>
		Design drawings of access and parking arrangements	<b>Appendix D3</b> <b>Appendix D5</b>
		Referral to TfNSW	<b>Appendix D1</b> <b>Appendix D5</b>
		Flooding considerations	<b>Section 3.2.3</b> <b>Section 4.2.1</b> <b>Appendix D6</b> <b>Appendix D7</b>
		Remedial Action Plan	<b>Appendix D1</b>
		Site Audit	<b>Appendix D1</b>
		Long-term Environmental Management Plan	<b>Appendix D1</b>
		Site Regulation	No further action required.
		Regulated systems	<b>Appendix D1</b>
		State Environmental Planning Policy (Resilience and Hazards) 2021	No further action required.
		Waste Management	No further action required.
		Engineering considerations	No further action required.
Public Submissions	Name withheld	Traffic	<b>Section 3.2.2</b> <b>Appendix D5</b>
	Yensate Pty Ltd	Traffic	<b>Section 3.2.2</b> <b>Appendix D5</b>



**APPENDIX C**  
**MITIGATION**  
**MEASURES**  
**TABLE**



**MITIGATION MEASURES TABLE**

Kelso Crescent Multi-Level Warehouse, Moorebank

20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>By:</b>	Mapletree SR Australia Management Pty Ltd
<b>In relation to:</b>	State Significant Development Application (SSD-58978472) For Kelso Crescent Multi-Level Warehouse, Moorebank
<b>Site:</b>	20 Kelso Crescent, Moorebank Lot 2 in DP 521146 and Lot C in DP 327378

Mapletree SR Australia Management Pty Ltd, plan to undertake the construction and operation of the proposed warehouse and distribution centre, in accordance with the following planned management and mitigation measures.

PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-58978472		
ID	Management / Mitigation Measure	Timing
<b>Administrative Commitments</b>		
<b>A1</b>	<p><b>Commitment to Minimise Harm to the Environment</b></p> <p>Mapletree will commit to implement all reasonable and feasible measures, to prevent and/or minimise any harm to the environment, that may result from the construction or operation of the proposed development</p>	Prior to construction, during construction, and during operation.
<b>A2</b>	<p><b>Terms of Approval</b></p> <p>Mapletree will carry out the project generally in accordance with the:</p> <ul style="list-style-type: none"> <li>(a) Environmental Impact Statement;</li> <li>(b) Drawings and Plans;</li> <li>(c) Management and Mitigation Measures;</li> <li>(d) Any Conditions of Approval.</li> </ul> <p>If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.</p>	Prior to construction, during construction, and during operation.
<b>A3</b>	<p><b>Occupation Certificate</b></p> <p>Mapletree will ensure that Occupation Certificates are obtained prior to the occupation of the facilities.</p>	Prior to operation.
<b>A4</b>	<p><b>Compliance</b></p> <p>Mapletree will ensure compliance with any reasonable requirement(s) of the Secretary of the NSW DPE arising from the assessment of:</p> <ul style="list-style-type: none"> <li>(a) Any reports, plans, programs, strategies or correspondence that are submitted in relation to this Approval; and</li> <li>(b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.</li> </ul>	Prior to construction, during construction, and during operation.



**MITIGATION MEASURES TABLE**

Kelso Crescent Multi-Level Warehouse, Moorebank

20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-58978472</b>		
<b>ID</b>	<b>Management / Mitigation Measure</b>	<b>Timing</b>
<b>A5</b>	<p><b>Structural Adequacy</b></p> <p>Mapletree will ensure that all new buildings and structures on the subject site are constructed in accordance with the relevant requirements of the National Construction Code.</p>	During construction.
<b>A6</b>	<p><b>Construction Environmental Management Plan</b></p> <p>Prior to the commencement of construction, Mapletree would prepare a Construction Environmental Management Plan (CEMP) that addresses the following:</p> <ul style="list-style-type: none"> <li>(a) Air Quality;</li> <li>(b) Noise and Vibration;</li> <li>(c) Waste Classification;</li> <li>(d) Erosion and Sediment Control;</li> <li>(e) Asbestos Removal Control;</li> <li>(f) Traffic Management; and</li> <li>(g) Community Consultation and Complaints Handling.</li> </ul>	Prior to construction.
<b>A7</b>	<p><b>Site Induction</b></p> <p>All staff employed on the site by the construction contractor will be required to undergo a site induction.</p>	Prior to construction.
<b>A8</b>	<p><b>Operation of Plant and Equipment</b></p> <p>Mapletree will ensure that all plant and equipment used on-site, is maintained, and operated in proper and efficient manner, and in accordance with the relevant Australian Standards.</p>	During construction and operation.
<b>A9</b>	<p><b>Monitoring the State of Roadways</b></p> <p>Mapletree will monitor the state of roadways leading to and from the subject site during construction, and will take all necessary steps to clean up any adversely impacted road pavements as directed by Liverpool City Council.</p>	During construction.
<b>A10</b>	<p><b>Waste Receipts</b></p> <p>Mapletree will ensure that a permanent record of receipts for the removal of both liquid and solid waste from the subject site is kept and maintained up to date at all times. Such records will be made available to authorised persons upon request.</p>	During construction and operation.
<b>A11</b>	<p><b>Complaints Handling</b></p> <p>Mapletree will prepare an Operational Complaints Handling Protocol for the development, prior to the commencement of operations.</p>	Prior to operation.



**MITIGATION MEASURES TABLE**

Kelso Crescent Multi-Level Warehouse, Moorebank

20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-58978472</b>		
<b>ID</b>	<b>Management / Mitigation Measure</b>	<b>Timing</b>
<b>A11</b>	<b>Dilapidation Assessment</b> Mapletree will undertake a Dilapidation Assessment of identified neighbouring industrial properties in accordance with Section 13 of the Construction Noise and Vibration Management Plan, prepared by Acoustic Works.	Prior to construction
<b>A12</b>	<b>Construction Vibration Monitoring and Management</b> Mapletree will implement the construction vibration monitoring and management procedures in accordance with Section 9 of the Construction Noise and Vibration Management Plan, prepared by Acoustic Works.	During construction
<b>A13</b>	<b>Construction Noise Monitoring and Management</b> Mapletree will implement the construction noise monitoring procedure and Construction Noise Management Plan in accordance with Section 13 of the Construction Noise and Vibration Management Plan, prepared by Acoustic Works.	During construction
<b>Specific Environmental Commitments</b>		
<b>Air Quality</b>		
<b>AQ1</b>	Air quality mitigation and monitoring will form part of the CEMP, to be prepared for the project, as outlined in <b>A6</b> .	Prior to construction.
<b>Noise and Vibration</b>		
<b>N1</b>	Mapletree will implement the Compliance Vibration Monitoring Procedure in accordance with Section 11.2 of the Noise and Vibration Assessment, prepared by Acoustic Works.	During operation
<b>N2</b>	Mapletree will implement the Noise Management Plan in accordance with Section 11.3 of the Noise and Vibration Assessment, prepared by Acoustic Works.	During operation
<b>Traffic and Transport</b>		
<b>TT1</b>	Mapletree will finalise and implement the Construction Traffic Management Plan (CTMP).	Prior to and during construction.
<b>Remediation</b>		
<b>R1</b>	A Work Health and Safety Management Plan shall be prepared by the remedial contractor, containing procedures and requirements that are to be implemented as a minimum during the works, in addition to the Contingency Plan.	Prior to remediation works.
<b>R2</b>	Site remediation shall be carried out in accordance with the approved Remedial Action Plan.	Prior to operation
<b>R3</b>	Upon completion of the remediation works, a Validation Report is required to be prepared to verify remedial works	Prior to operation



**MITIGATION MEASURES TABLE**

Kelso Crescent Multi-Level Warehouse, Moorebank

20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-58978472</b>		
<b>ID</b>	<b>Management / Mitigation Measure</b>	<b>Timing</b>
	were completed in accordance with the Remedial Action Plan.	
<b>Cultural Heritage</b>		
<b>H1</b>	An Unexpected Finds Policy will be developed, in the unlikely event that relics are identified during ground disturbing works.	Prior to construction.
<b>H2</b>	Unexpected Aboriginal objects remain protected by the <i>National Parks and Wildlife Act 1974</i> . If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity will cease immediately. A qualified archaeologist would be contacted to assess the find and Heritage NSW and Metropolitan Local Aboriginal Land Council would be notified.	During construction.
<b>H3</b>	If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity will cease, the site would be secured, and the NSW Police and Heritage NSW would be notified	During construction.
<b>H4</b>	All relevant staff, contractors and subcontractors will be made aware of their statutory obligations for heritage under the NSW <i>Heritage Act 1977</i> and best practice as outlined in <i>The Burra Charter 2013</i> , during site inductions.	Prior to construction.
<b>Socio-Economic</b>		
<b>SE1</b>	Mapletree will notify surrounding businesses and residents one (1) week before commencement of construction activities. Notices should include: <ul style="list-style-type: none"> <li>▪ Details of the proposal, including contact details of the management team</li> <li>▪ Hours and expected period of construction</li> <li>▪ Details regarding process should businesses or residents have concerns, questions or complaints</li> </ul>	Prior to construction.
<b>SE2</b>	Mapletree will set up a feedback process to manage and respond to stakeholder concerns, questions, or complaints. Mapletree will ensure that this process is clear and accessible to stakeholders such as surrounding businesses and residents.	Prior to and during construction.
<b>SE3</b>	Mapletree will prioritise engaging with local businesses, where practicable, e.g. site induction for visiting workers to include profile of surrounding food and beverage retailers.	During construction.
<b>Waste Management</b>		
<b>WM1</b>	Effective management of construction materials and construction and demolition waste, including options for reuse and recycling where applicable and practicable, would be conducted. Only wastes that cannot be cost effectively reused or recycled will be sent to landfill or appropriate disposal facilities.	During construction.



**MITIGATION MEASURES TABLE**

Kelso Crescent Multi-Level Warehouse, Moorebank  
 20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-58978472</b>		
<b>ID</b>	<b>Management / Mitigation Measure</b>	<b>Timing</b>
<b>WM2</b>	Waste materials produced from site preparation and construction activities will be separated at the source and stored separately on-site.	During construction.
<b>WM3</b>	<p>The Site Manager or equivalent role will:</p> <ul style="list-style-type: none"> <li>▪ Arrange for suitable waste collection contractors to remove any construction waste from site;</li> <li>▪ Ensure waste bins are not filled beyond recommended filling levels;</li> <li>▪ Ensure that all bins and loads of waste materials leaving site are covered;</li> <li>▪ Maintain waste disposal documentation detailing, at a minimum:               <ul style="list-style-type: none"> <li>○ Descriptions and estimated amounts of all waste materials removed from site;</li> <li>○ Details of the waste and recycling collection contractors and facilities receiving the waste and recyclables;</li> <li>○ Records of waste and recycling collection vehicle movements, for example, date and time of loads removed, licence plate of collection vehicles, tip dockets from receiving facility;</li> <li>○ Waste classification documentation for materials disposed to off-site recycling or landfill facilities;</li> </ul> </li> <li>▪ Ensure lawful waste disposal records are readily accessible for inspection by regulatory authorities such as Liverpool City Council, SafeWork NSW or NSW EPA; and</li> <li>▪ Remove waste during hours approved by Council.</li> </ul>	During construction.
<b>WM4</b>	<p>Site inductions, as required under <b>A7</b> will ensure the following training is covered:</p> <ul style="list-style-type: none"> <li>▪ Legal obligations and targets;</li> <li>▪ On-site emergency response procedures;</li> <li>▪ Waste priorities and opportunities for reduction, reuse, and recycling;</li> <li>▪ Waste storage locations and separation of waste;</li> <li>▪ Procedures for suspected contaminated and hazardous wastes;</li> <li>▪ Waste related signage;</li> <li>▪ The implications of poor waste management practices; and</li> <li>▪ Responsibilities and reporting, including identification of personnel responsible for waste management and individual responsibilities.</li> </ul>	Prior to construction.



**MITIGATION MEASURES TABLE**

Kelso Crescent Multi-Level Warehouse, Moorebank

20 Kelso Crescent, Moorebank (Lot 2 in DP 521146 and Lot C in DP 327378)

SSD-58978472

<b>PLANNED MANAGEMENT AND MITIGATION MEASURES FOR SSD-58978472</b>		
<b>ID</b>	<b>Management / Mitigation Measure</b>	<b>Timing</b>
<b>Vegetation Management</b>		
<b>VM1</b>	The approved Tree Protection Management Plan shall be implemented, and tree protection measures must be installed and maintained, as required and to the satisfaction of the project arborist.	Prior to and during construction
<b>VM2</b>	Site inductions, as required under <b>A7</b> will ensure that the following training is covered: <ul style="list-style-type: none"> <li>▪ Understanding of the Tree Protection Management Plan</li> </ul>	Prior to construction
<b>VM3</b>	Inspections shall be conducted by the project arborist at several key points during the construction in order to ensure that protection measures are being adhered to during construction stages and decline in tree health or additional remediation measures can be identified.	During construction
<b>VM4</b>	All earthworks within the identified tree protection zones of the trees to be retained, shall be supervised by the project arborist.	Prior to and during construction
<b>ESD</b>		
<b>E1</b>	CHH will target a Certified Four (4) Star Green Star Design & As-Built v1.0 Rating.	Prior to construction, during construction, and during operation.



**APPENDIX D**  
**SUPPORTING**  
**DOCUMENTS**

