

Dave Auster
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

**Re: Request advice on the Amendment Report for SSD-58978472 – Kelso Crescent
Multi-Level Warehouse, Moorebank**

Dear Dave,

Liverpool City Council was invited to provide advice on the Amendment Report for the above application.

Attachment A of this letter provides detailed comments.

Page 2 – Flooding

Page 3 – City Design and Public Domain (Urban Design Considerations)

If you have any additional enquiries in relation to:

- Flooding: Contact Zeaul Hoque, Senior Floodplain Engineer via. Phone 02 8711 7747 or via. Email hoqueZ@liverpool.nsw.gov.au
- Urban Design: Contact Melissa Riley, Senior Urban Design Advisor via. Phone on 02 8711 7714 or via. Email at rileyme@liverpool.nsw.gov.au

Should you require any further information on this matter, please do not hesitate to contact Edwar Eshow, Acting Senior Development Assessment Planner on 8711 7036.

Yours sincerely,



Edwar Eshow
Acting Senior Development Assessment Planner

Attachment A – Detailed Comments

A. Flooding

This flooding assessment has considered the following recent submissions related to the proposed development:

- **Kelso Crescent Amendment Report** – Willowtree Planning, Version 02, dated 17 October 2025
- **Appendix DD5 – Flood Impact Risk Assessment** – Costin Roe Consulting, Revision B, dated 17 October 2025
- **Appendix DD4 – Civil Report and Plans** – Costin Roe Consulting, Revision B, dated 17 October 2025
- **Appendix DD1 – Architectural Plans** – PACE Architects, Revision B, dated 08 October 2025

After reviewing the proposal and the submitted documents, I note the following key points:

- The proposed development site is located within the Georges River catchment; therefore, the **State Environmental Planning Policy (Biodiversity and Conservation) 2021 (SEPP BC)** applies to this site. Accordingly, the proposal must demonstrate compliance with the provisions outlined in **Section 6.8 of SEPP BC**, as set out below:
 - (2) Development consent must not be granted to development on flood liable land in a regulated catchment unless the consent authority is satisfied the development will not—*
 - (a) if there is a flood, result in a release of pollutants that may have an adverse impact on the water quality of a natural waterbody, or*
 - (b) have an adverse impact on the natural recession of floodwaters into wetlands and other riverine ecosystems.*
- An open temporary sediment basin has been proposed on flood-affected land, which poses a potential risk to the water quality of the adjacent natural waterbody during flood events. To comply with **Section 6.8 of SEPP BC**, the sediment basin must either be relocated to a flood-free area or be supported by robust mitigation measures that demonstrate compliance with the policy requirements.
- Vehicular access to Seton Road cannot be supported from a flooding perspective for the following reasons:
 - ❖ The driveway level must be no lower than 0.3m below the 1% AEP flood. The required minimum driveway level to Seton Road is 8.2m.
 - ❖ Seton Road is classified as a high flood-risk area during a 1% AEP flood event.
- The Flood Impact Risk Assessment report by Costin Roe Consulting indicates that the proposed development will have an adverse flooding impact on the property at 19 Seton Road, Moorebank (refer to Drawing Nos. **CO14972.02-F320**, **CO14972.02-F520**, and **CO14972.02-F531**). The proposed development must not cause any adverse impact on private property. Appropriate mitigation measures must be incorporated into the design to ensure that no adjoining property is adversely affected.
- Detailed calculations of pre- and post-development flood storage volumes, including a full breakdown of components, must be provided to support the assessment.

B. City Design and Public Domain (Urban Design Considerations)

General Summary – The development has improved in terms of redesign, breaking the building into two, enabling stairs, ramps and multideck car parking to no longer dominate the front setback, and be replaced with an increase of landscaping and retaining two trees. The increase of offices on the façade improves the blank wall condition while providing passive surveillance. However there are remaining issues that are a significant concern, the removal of the significant trees 15 and 17, the 6% landscape area, unsafe pedestrian entry through car park and the public domain upgrades and street trees not included in the development. The Urban Design team emphasises the importance that they are resolved, particularly for a development of this size and impact to the landscape.

For the purpose of this referral City Design and Public Domain team (CDPD) is referred to as 'Urban Design' or 'UD' to be consistent with the Council RFI.

The below table is Urban Design's original comments, how they were responded to in the RtS submission dated 07.03.2025 and how they were responded to in the current submission.

Existing Trees Removal and landscape area requirements

The efforts to retain an additional 2 trees along Kelso Crescent since the original submission is appreciated. However, the removal of Trees 15 and 17 is of significant concern. They are significantly sized (19m and 21m tall), mature native trees, both with good Health, Structure and Amenity value as per the Arborist Report.

It is understood that the removal of trees can be necessary as part of developments, particularly industrial developments with large floorplates, however retaining existing trees in the street frontage setbacks is paramount, as it is the optimal place to retain trees, where they do not impact the building footprint, and are a key contribution to the streetscape. Trees are an important contribution to the character of the street, provide shade and mitigate the Urban Heat Island Effect. Liverpool LGA experiences severe urban heat island effect and has a significant shortage of tree canopy cover throughout, due to intense urbanisation. Refer to the Liverpool City Council Tree Management Framework for more information on the critical need for tree canopy. Trees 15 and 17 are very mature and significantly sized it would take many years for a replacement tree to reach their size and contribution to the Urban Heat Island Effect and canopy cover.

The trees are located very close to the site boundary and the base of the tree is level with the existing ground of the street. Therefore there is no complex site constraint, or topographical consideration for them to not be able to be retained. A development's RLs should be driven by the surrounding existing RLs that it needs to tie into. The applicant is urged to retain these trees, and incorporate measures to ensure they can be retained, such as making adjustments to the proposed RLs, reconfigure the car park, increase the building setback and utilise flexible paving surrounding.

Further to the above points on the Urban Heat Island Effect landscape area also plays an important role, reiterating the importance of achieve the at least the DCP minimum 10%.

Previous Referral/ RFI Comments (25.06.2024)	RtS Comments (07.03.2025) (wording as per the Council RFI later, which was reworded by the Council Planner)	Current referral Comments (02/12/2025)
<p>Landscaping Setbacks Seton Road setback interpreted as a primary setback and should be increased to 10m.</p>	<p><i>Not addressed and CDPD does not agree with the applicant's justification provided. The area where the applicant is justifying is 16.8m setback does not front the street, therefore is not part of the front setback, it only relates to the portion with street frontage. Considering the amount that this development is maximising the site, setbacks should be adhered to at a minimum.</i></p>	<p>Justification noted.</p>
<p>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.</p>	<p><i>Not addressed and street frontage has worsened with ramping increased in the Seton Road frontage.</i></p> <p><i>Blank walls, monotonous façade and lack of articulation is still a significant issue. UD notes Public Art have provided a referral and if Public Art is addressed this will assist in mitigating concerns.</i></p> <p><i>The DCP requires Landscaped area of minimum 10%. The landscape drawings don't illustrate how they calculated the 12% proposed and whether it includes the upper levels. CDPD believes it should be at ground level only and not the upper levels.</i></p> <p><i>In addition, the DCP states 'Trees must be planted in the landscape area at a minimum rate of 1 tree per 30sqm of the landscaped area' and 'trees must be capable of achieving a mature height greater than 8m'. The DCP notes trees above an easement can be a maximum of 4m, and the Endeavour Energy comments restricts trees altogether.</i></p> <p><i>Therefore CDPD requests clarity on how trees will be provided to comply with the DCP, 1 per 30sqm, and capable of achieving a height greater than 8m.</i></p>	<p>Partially addressed</p> <p>Street frontage has improved with revised design. The ramping and stairs in the front setback has been minimised, and more landscaping proposed. Two additional existing trees retained is appreciated.</p> <p>Blank wall conditions have improved.</p> <p>The landscape areas is only 6% of the site area, this is not supported. Permeable paving should not be included in the landscape area calculations. This means the proposal is counting car parking as landscape area which is inappropriate. A minimum of 10% landscape should be proposed, and not include permeable paving/car parking.</p>

	<p><i>In addition, CDPD questions whether the full easement should be included in the 10% landscaped area, since it cannot provided landscaping in the way other areas can, and suggests to achieve adequate landscaping on this site, only half of the easement area be included.</i></p>	<p>This is a significant issue and is pressed.</p>
<p>Ground Levels <i>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.</i> <i>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.</i></p>	<p>Not addressed <i>The Response to RtS states ‘existing ground line shown dashed on DA-301 C’ however the last DA-301-Sections drawing Urban Design reviewed was in the initial review, and it was Issue D and did not have the existing ground line. The latest drawings do not include a revised DA-301.</i></p> <p><i>Flood levels justification is acknowledged.</i></p>	<p>Not addressed and still applies. DA-301 still does not illustrate the existing natural ground line. This is especially important to understand where the existing trees 15 and 17 sit in relationship to the proposed levels.</p>
<p>Sustainability <i>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</i></p>	<p>Not addressed</p> <p><i>Paving - Urban Design emphasises the importance of this recommendation and encourages greater investigation into permeable paving products that are designed for heavy industrial traffic and road infrastructure.</i></p> <p><i>Solar Panels – Not addressed, revised roof plan has not been provided and no justification provided</i></p>	<p>Partially Addressed. Permeable paving and solar panels have been proposed. Permeable paving extent is acceptable, however the expanse of solar panels is a very small portion of the roof and UD recommends the number of solar panels is significantly increased.</p>

<p><i>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). Council staff strongly encourages the applicant commit to a number of solar panels and utilise as much of the roof space as possible</i></p>		
<p>Landscaping Drawings <i>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: ▪ 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</i></p>	<p>Not addressed</p> <p><i>From previous SSDA applications, the Department of Planning Officer (the consent authority) has preferred information such as this is included in the SSDA drawings to minimise unnecessary additional drawing review later.</i></p> <p><i>Urban Design notes a detailed Public Domain Plan is typically conditioned and provided as part of the CC stage, however at the minimum the SSDA drawings should illustrate the scope of works extending beyond the site boundary, and include the public domain in both street frontages, pedestrian footpath upgrades, annotations to Council Specifications, where grass verge is proposed and street trees. Otherwise there is a risk these are not part of the scope and delivered, particularly street trees.</i></p> <p><i>Currently there is no works in front of the boundary shown, and no street trees, therefore a risk of them not being delivered.</i></p>	<p>Not Addressed, still applies, this is a significant issue and is pressed.</p>

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.

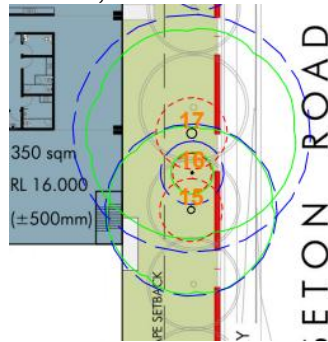
Tree Retention
 Several native, mature trees in good condition and within the front landscape setback and proposed to be removed (being: T15, T16, T17, T36 and T37), and this is not supported. Pot sizes should therefore be increased for several of the trees to a minimum 100L, and 200L for street trees, to reduce the time it will take for canopy to establish

Not addressed

These trees are all native, mature trees, all in at minimum good condition except for T16 which is 'fair' condition. T36 – the pedestrian entry could be reconfigured to keep.



Unclear why T15, T17 cannot be retained as well, now that T16 is being retained.



The Arborist report just states 'Remove' against these trees with no justification why.

Street trees have not been shown, these should be shown and pot sizes at 200L.

Not Addressed. Refer to Recommendation above this table.

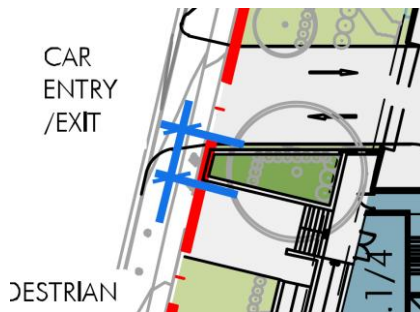
Safety and Amenity

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. 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

Not addressed.

The car park and entries are not separated by 8m landscaped as described.

The distance/dimension in question is illustrated below and appears to be 2-3m.



Not addressed. While the pedestrian entry is not far from the driveway, it runs straight through the car park. This is not a safe or appropriate way to enter a main entry of a building, through a car park. **The main entry foot path should be reconfigured to enable a direct connection to the main entry, with enough separation from the driveways and not having to walk through a car park and conflict with vehicles.**