



Your ref: SSD-58978472
Our ref: DOC25/944406

Mr Dave Auster
Senior Environmental Assessment Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2050

27/11/2025

**Subject: CPHR Advice – Amendment Report for Proposed Multi-Level Warehouse,
Kelso Crescent, Moorebank (SSD-58978472) (Liverpool)**

Dear Mr Auster,

Thank you for your e-mail received on 4 November 2025 requesting advice on the Amendment Report for the above project from the Conservation Programs, Heritage and Regulation Group (CPHR) of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW).

CPHR has reviewed the *Amendment Report: Kelso Crescent Multi-Level Warehouse, Moorebank* (Willowtree Planning, 17 October 2025) and the *Flood Impact Risk Assessment* Rev B (Costin Roe, 17 October 2025) and provides detailed comments at **Attachment A**.

In summary:

- The design changes compromise the safety of the emergency vehicle ramp and building occupants by introducing floodwater beneath the building footprint to meet flood storage requirements. CPHR recommends compensatory storage be located outdoors to avoid drainage, maintenance, and safety risks and the revised approach be supported by updated flood modelling.
- Responsibility for maintaining and periodically reviewing the flood emergency management strategy will ultimately rest with the facility manager for the duration of the development's operation and recommends this be addressed by the emergency management strategy.

A waiver to prepare a Biodiversity Development Assessment Report (BDAR) for the amended development proposal was issued by CPHR on 30 October 2025. Please note if the proposed development is changed prior to determination so that it is no longer as described in Schedule 1 of the determination, the applicant will need to lodge a new waiver request or prepare a BDAR. I request that CPHR not be given a role in any conditions of consent unless CPHR agrees to the role and the condition.

If you have any further questions about this issue, please contact Liz Peterson, Senior Conservation Planning Officer at elizabeth.peterson@environment.nsw.gov.au.

Yours sincerely

Louisa Clark
Director, Greater Sydney Branch
Regional Delivery
Conservation Programs, Heritage and Regulation

CPHR Advice – Amendment Report for Proposed Multi-Level Warehouse, Kelso Crescent, Moorebank (SSD-58978472) (Liverpool)

Documents Reviewed

In preparing this advice, CPHR has reviewed the following documents:

- *Amendment Report: Kelso Crescent Multi-Level Warehouse, Moorebank* (Willowtree Planning, 17 October 2025)
- *Flood Impact Risk Assessment for 20 Kelso Crescent Moorebank* (Rev B Costin Roe Consulting, 17 October 2025) [FIRA]
- *Civil Engineering Report Incorporating Water Cycle Management Strategy for 20 Kelso Crescent Moorebank* (Rev B Costin Roe Consulting, 17 October 2025).

Key Assessment Issues

<i>Flood Storage</i>	The design changes have compromised the safety of the emergency vehicle driveway ramp. To comply with Council's Development Control Plan requirement for no net loss of floodplain storage below the 1% AEP level, the design now proposes two compensatory flood storage areas by excavating trenches beneath the ground floor suspended slab, providing approximately 3,366m³ of storage. These areas will drain to Council's stormwater network via a culvert at RL 6.0m. However, this approach has now compromised the safety of the building occupants, by encouraging floodwater into and beneath the building footprint and inundating the emergency access ramp in large flood events. Locating compensatory storage within the building footprint is less desirable than external storage due to: • drainage and maintenance challenges • potential blockage of inlets • accumulation of debris, contaminants, and vermin. Additionally, the FIRA flood mapping has not been updated to demonstrate how the proposed storage will function under the revised conditions. Recommended actions: • If Council determines that compensatory flood storage is required at this site then storage should be located outdoors, not within the building footprint. • Flood modelling be revised to include any new flood storage arrangements.
<i>Extent and Timing</i>	Pre-determination
<i>Evacuation Strategy Implementation</i>	Section 8 of the FIRA states "Management (construction & operational stages) need to be responsible for ongoing awareness and education including informing the community on how to prepare for and how and when to act in response (to) a flood threat". CPHR has previously advised that the Applicant should detail how the proposed emergency management strategy will be implemented and maintained by future owners. Recommended action • Responsibility for maintaining and periodically reviewing the flood emergency management strategy be assigned to the facility manager for the entire operational life of the development, and that this

	requirement be clearly incorporated into the emergency management strategy.
<i>Extent and Timing</i>	Post determination

End of Submission