

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

**Sent via portal**

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

Dear David,

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

Apologies the initial response excluded comments from the urban design team which forms part of this submission, and I thank you for bringing it to my attention.

In relation to the public art comments, we have revised them and would appreciate if possible for them to be presented to the applicant.

Attachment A of this letter provides detailed comments.

Page 2	-Urban Design
Page 7	-Public Art

Should you require further information or clarification, please feel free to be in contact.

Yours sincerely,



**Tony Hadchiti**  
Austral Delivery Manager

## Attachment A – Detailed comments

### 1. Urban Design

For the purpose of this referral CDPD is referred to as 'Urban Design' or 'UD' to be consistent with the Council RFI.

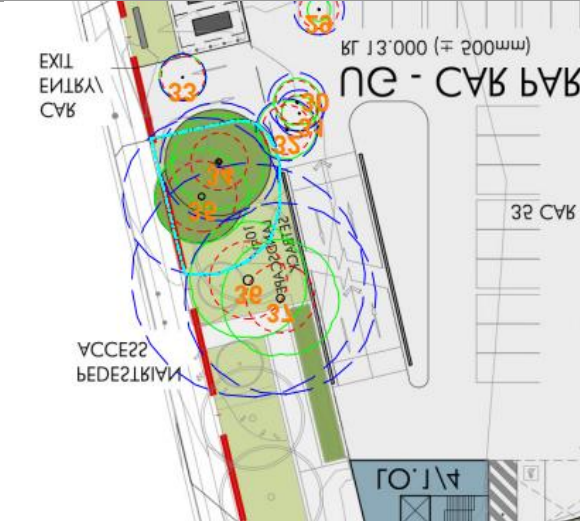
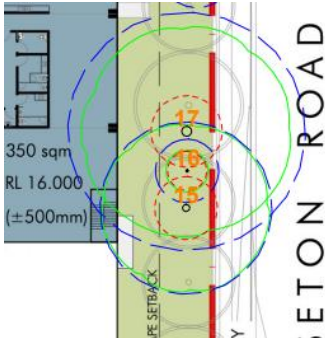
The below table is all of Urban Design's comments that were included in the applicant's Response to RtS.

There have been very little changes in response to the previous Urban Design comments.

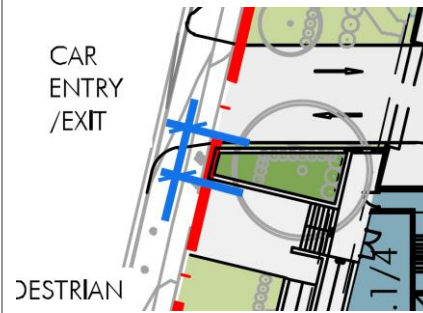
Previous Referral/ RFI Comments (25.06.2024)	Current Referral Comments (07.03.2025)
<p><b>Landscaping Setbacks</b></p> <p><i>Seton Road setback interpreted as a primary setback and should be increased to 10m.</i></p>	<p><b>Not addressed</b> and CDPD does not agree with the applicant's justification provided. 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.</p>
<p><b>Built Form and Street Interface</b></p> <p><i>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.</i></p>	<p>Not addressed and street frontage has worsened with ramping increased in the Seton Road frontage.</p> <p>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.</p> <p>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</p> <p>In addition, the DCP states '<i>Trees must be planted in the landscape area at a minimum rate of 1 tree per 30sqm of the landscaped area</i>' and '<i>trees must be capable of achieving a mature height greater than 8m</i>'. The DCP notes trees</p>

	<p>above an easement can be a maximum of 4m, and the Endeavour Energy comments restricts trees altogether.</p> <p>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.</p> <p>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.</p>
<p><b>Ground Levels</b></p> <p><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. 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><b>Not addressed</b></p> <p>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.</p> <p>Flood levels justification is acknowledged.</p>
<p><b>Sustainability</b></p> <p><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 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><b>Not addressed</b></p> <p>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.</p> <p>Solar Panels – Not addressed, revised roof plan has not been provided and no justification provided</p>

<p><b>Landscaping Drawings</b></p> <p><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 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.</i></p>	<p><b>Not addressed</b></p> <p>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.</p> <p>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.</p> <p>Currently there is no works in front of the boundary shown, and no street trees, therefore a risk of them not being delivered.</p>
<p><b>Tree Retention</b></p> <p><i>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</i></p>	<p><b>Not addressed</b></p> <p>These trees are all native, mature trees, all in at minimum good condition except for T16 which is 'fair' condition.</p> <p>T36 – the pedestrian entry could be reconfigured to keep.</p>

	<div data-bbox="815 170 1398 689"></div> <p data-bbox="815 768 1398 831">Unclear why T15, T17 cannot be retained as well, now that T16 is being retained.</p> <div data-bbox="815 853 1141 1189"></div> <p data-bbox="815 1267 1398 1330">The Arborist report just states 'Remove' against these trees with no justification why.</p> <p data-bbox="815 1408 1398 1471">Street trees have not been shown, these should be shown and pot sizes at 200L.</p>
<p data-bbox="193 1552 802 1583"><b>Safety and Amenity</b></p> <p data-bbox="193 1606 802 1944"><i>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</i></p>	<p data-bbox="815 1606 1398 1637">Not addressed.</p> <p data-bbox="815 1715 1398 1778">The car park and entries are not separated by 8m landscaped as described.</p> <p data-bbox="815 1856 1398 1919">The distance/dimension in question is illustrated below and appears to be 2-3m.</p>

*frequenting this development have access to good quality communal space*



## **2. Public Art**

The DCP Part 7 Objectives seek to “*ensure the creation of an attractive streetscape character within each industrial area*” and one of the controls for façade treatment is to ‘*minimise large expanses of blank walls*’.

The ground level of the southern elevation on Seton Road is mostly blank wall and not an acceptable street interface. The DCP Part 7 Objectives include to “*ensure the creation of an attractive streetscape character and Control - ‘A development must use architectural elements to articulate facades and minimise large expanses of blank walls.’*” The ground level is critical to the character, pedestrian experience and passive surveillance of the street. Council staff recommends the applicant improve the ground floor façade design, through additional windows, permeability, material differentiation, texture and/or articulation. Continuing the approach of the upper levels to lower levels could also be explored.

Council recommends that endemic First Nations public art narratives are engaged to provide opportunities for Connecting with Country Framework and to provide meaningful engagement with Local First Nations creative industry.

### **PART A - GENERAL CONDITIONS**

Public art shall be designed to activate and enhance the development for users of the site as well as active and passive audiences from the public domain.

Public art within the Liverpool LGA is to be designed and delivered in accordance with Council's endorsed Public Art Policy and;

- (a) Aligns with required planning instruments relevant to the site;
- (b) Employ appropriate scale and size in relation to the built form;
- (c) Address bulk facades visible from the public domain;
- (d) Utilise endemic narratives;
- (e) Engage local artists, through lead or collaborative commission, in the design and development of public art;
- (f) Are designed and fabricated as permanent, lasting the lifetime of the construction;
- (g) Consider specific recommendations and or benchmarking provided by Council or negotiate alternative deliverables.

### **PART B - BEFORE THE ISSUE OF A CONSTRUCTION CERTIFICATE**

Prior to the issue of a Construction Certificate the following is to be submitted, through the nominated planner, to Liverpool City Council Public Arts Officer for approval and endorsement.

A Preliminary Public Art Plan including;

- (a) Planning controls;
- (b) Initial proposed locations;
- (c) Scale to bulk;
- (d) Project timeline;
- (e) Identified current and/or future audiences;

- (f) The role and benefit role, benefit;
- (g) Benchmarking.

### **PART C - BEFORE BUILDING WORK COMMENCES**

Prior to the commencement of any building works the following requirements are to be submitted, through the nominated planner, to Liverpool City Council Public Arts Officer for approval and endorsement.

A Preliminary Public Art Plan including;

- (a) Planning controls;
- (b) Initial proposed locations;
- (c) Scale to bulk;
- (d) Project timeline;
- (e) Identified current and/or future audiences;
- (f) The role and benefit role, benefit;
- (g) Benchmarking;
- (h) Commissioned artist/s;
- (i) Concept designs; and
- (j) Artwork dimensions and materials.

### **PART D - WHILE BUILDING WORK IS BEING CARRIED OUT**

While building work is being carried out the following requirements are to be submitted, through the nominated planner, to Liverpool City Council Public Arts Officer for approval and endorsement.

1. The site architectural and landscape plans are to be submitted identifying the endorsed public art concept designs.
2. Notification on commencement of artwork fabrication, delivery, and installation.
3. The Public Art Plan is to be finalised to include;
  - (a) Artist/s and artwork statement;
  - (b) Maintenance Schedule; and
  - (c) Approved final design.

### **PART E - BEFORE THE ISSUE OF AN OCCUPATION CERTIFICATE**

Prior to the issue of an Occupation Certificate the following requirements are to be submitted, through the nominated planner, to Liverpool City Council Public Arts Officer for approval and endorsement.

Upon completion of the approved public art associated with the development and prior to the issue of any Occupation Certificate, high resolution images are to be provided. These images;

- (a) Are taken once the approved landscape works have been completed;
- (b) Include a selection of full artwork images and detail, taken from various perspectives;
- (c) Include images taken from key sightlines from the public domain;



(d) (d) Are JPEG or PNG files at a minimum of 2 mega pixels.

The addition of public art to bulk industrial facades has been incredibly successful for proponents, residents, local creative industry and visitors and is setting a new standard for such developments.

Year	Location	Examples
2025	Church Rd, Moorebank	
2024	Cnr Yarrunga St & Bernera Rd, Prestons	

202 3	Kurrajong Road, Prestons.	
202 2	Kurrajong Road, Prestons	