

22 October 2025

Secretary  
Department of Planning, Housing and Infrastructure

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### **Town Planning Submission**

SSD-84348959 – 19 Hope Street, Melrose Park 2114 and 69, 71, 73, 75, 77 Hughes Avenue, Ermington 2115 NSW 2115

State Significant Development Application– Mixed development within four towers containing ground floor retail, 197 affordable housing units and 154 co-living units.

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## **1. Executive Summary**

This submission has been prepared by Knight Frank Town Planning made on behalf of George Weston Foods Limited (**GWF**) and is made in response to State Significant Development Application (**SSDA**) No. 84348959 that seeks approval for construction of a mixed development comprising four towers containing ground floor retail area, 197 affordable housing units and 154 co-living units at 19 Hope Street, Melrose Park and 69, 71, 73, 75, 77 Hughes Avenue, Ermington (Melrose Park Gateway Site).

In summary, GWF do not oppose high-density residential development contemplated by the Melrose Park precinct structure planning. What is opposed, however, is development that could impact on the orderly and economic redevelopment of the remaining land within the Melrose Park south precinct of which GWF is a significant landowner.

The SSDA should not be approved until an appropriate precinct-wide study has been undertaken by Government to determine whether the proposed scale, density, and housing mix are appropriate and consistent with supporting and promoting the orderly and economic development of the entire Melrose Park precinct. A precinct-wide study is necessary to ensure that isolated planning does not compromise the orderly and economic redevelopment of the Melrose Park precinct, particularly given there is an established local clause which contemplates an overall dwelling capacity for the precinct.

Given the SSDA represents a significant increase in density from what was originally contemplated we consider this to be a threshold matter.

Further to the precinct planning concerns raised, the following are significant matters that remain and should be taken into account in the assessment of the SSDA:

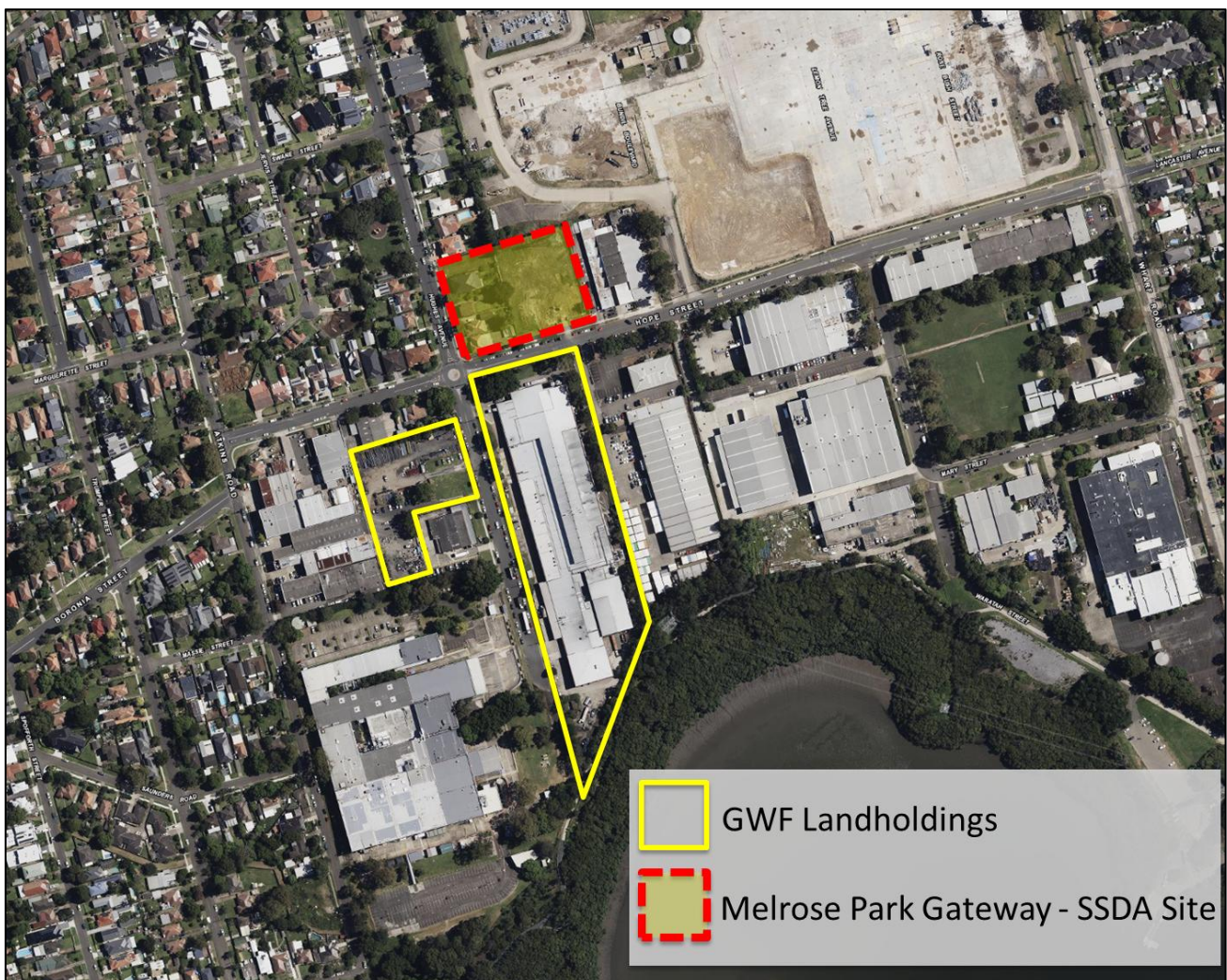
- GWF has substantial landholdings in Melrose Park and Ermington, including a well-established bakery site. Constructing a high density mixed-use development at the scale proposed, with a substantial residential component, adjacent to existing commercial / industrial land uses is likely to create a land-use conflict.
- During construction, traffic impacts and dust emissions associated with the SSDA must be appropriately managed to ensure that GWF's existing bakery operations are not adversely impacted. This must be considered in the context of the significant amount of development that is being undertaken and is planned within the Melrose Park precinct.
- Greater consideration needs to be given to the impacts of the development with respect to solar access and overshadowing on our clients land. As proposed there is significant overshadowing generated with respect to the current use and any future development contemplated under the structure planning for the precinct.

## 2. GWF landholdings in Melrose Park / Ermington

GWF is one of the largest global food manufacturing businesses. In NSW, the business employs approximately 1,360 staff, contributing to a national workforce of over 6,000 staff and a multi-billion-dollar turnover. Further to direct employment, there is significant flow-on in related industries such as in delivery/logistics and agricultural supply chains. GWF has significant landholdings opposite to the Melrose Park Gateway Site, comprising:

- 2 Hope Street, Melrose Park (Lot 2 DP602080), at which GWF operates the Speedibake plant (**Speedibake Site**); and
- 78 Hughes Ave, Ermington (Lot 11 DP3370), which is used for staff car parking for the Speedibake Site (**Car Park Site**),
- (together, **GWF Site**).

The GWF Site is outlined in yellow in **Figure 1** below.



**Figure 1 - Location of SSDA site and GWF holdings**

The GWF Site is a major source of bread manufacturing for Sydney and NSW, supplying bread products under major commercial contracts across the east coast of Australia. The following are the key operational details for the GWF Site:

- employment of 200 staff across three shifts;
- the production of circa 300 tons of bread per week;

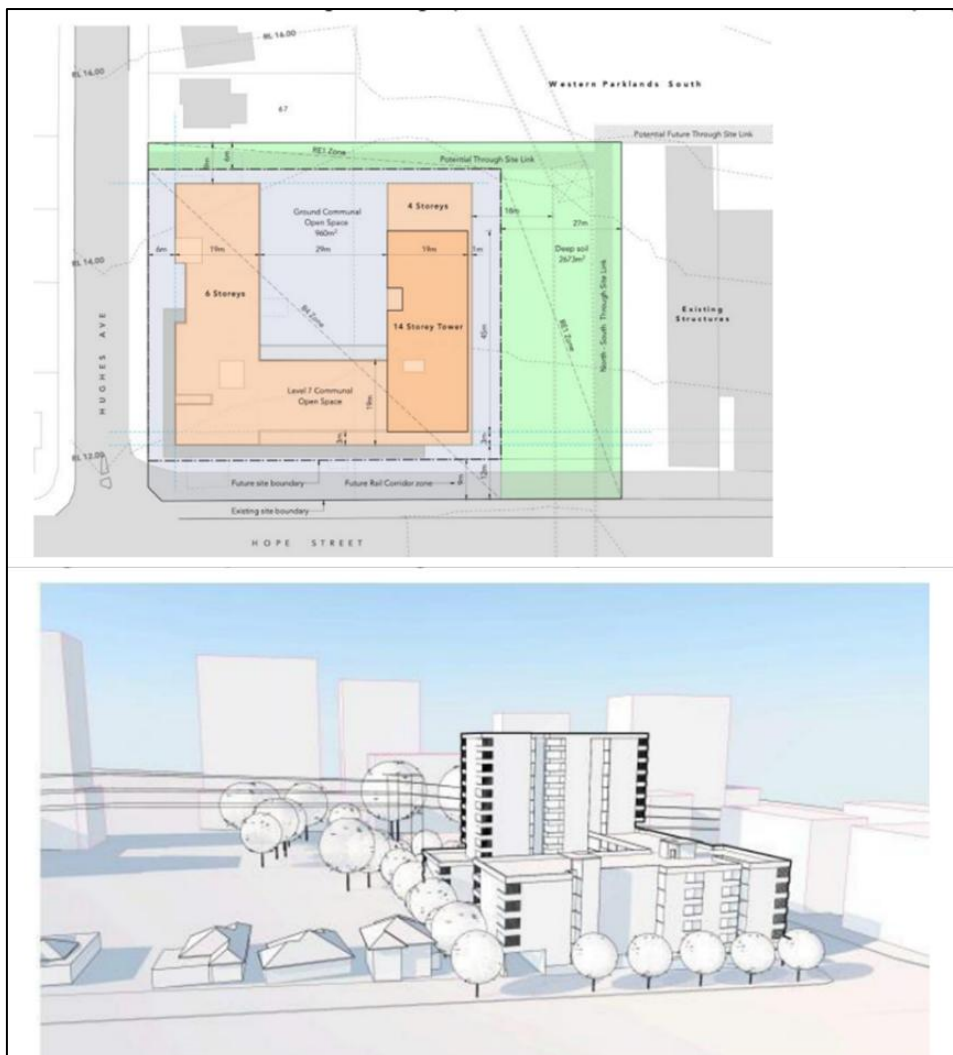
- investment in equipment and plant of circa \$70 million;
- significant truck and staff movements per day; and
- 6 days a week for extended hours.

Further to their commercial operations, GWF also donate bread products including 2.2 million loaves of bread to Foodbank each year. The bakery plant is a well-established business at this location.

### 3. Background

Prior to the submission of the subject SSDA, a Planning Proposal (PP-2023-1736) was finalised in November 2024 (see **Figure 2**) for the site. The PP established a planning framework to support a mix of high-density residential development, complemented by fine grain retail and commercial and public recreation land uses. The key amendments introduced are summarised as follows:

- Rezoning from E4 General Industrial to part MU1 Mixed Use and part RE1 Public Recreation;
- Rezoning from R2 Low Density Residential to MU1 Mixed Use;
- Amending the maximum building height across the site from part 9m and part 12m to 48m;
- Amending the Floor Space Ratio (FSR) from part 1:1 to 2.67:1 (for MU1 Mixed Use land only); and
- Inserting a site-specific provision to ensure a minimum of 1,400m<sup>2</sup> of non-residential floor space is provided on site.



**Figure 2 – Indicative Melrose Park Gateway Site Development Scheme and Built Form** (Source: Gateway determination report October 2023)



Separate to the Planning Proposal, but of relevance, the following clause has been inserted into the PLEP 2023 which addresses the overall capacity for residential development within the Melrose Park Precinct (our emphasis in bold):

#### 9.5 Concurrence of Planning Secretary

- (1) *Development consent must not be granted to development for the purposes of residential accommodation in Melrose Park North or Melrose Park South that will **result in more than 11,000 dwellings in the Melrose Park Precinct** unless the consent authority has obtained the concurrence of the Planning Secretary.*
- (2) *In deciding whether to grant concurrence, the Planning Secretary must—*
- (a) *consider the nature, scale and location of the development in relation to existing and proposed road and public transport infrastructure in the area, and*
  - (b) *consult the public authorities the Planning Secretary considers relevant to the development.*

Our concerns with respect to the orderly delivery of development within the Melrose Park Precinct in the context of the overarching capacity are detailed in section 4(a) below.

## 4. Response to Exhibited Development

### a) Melrose Park Precinct Planning

The SSDA is accompanied by a concurrent Planning Proposal that seeks to amend the existing planning controls to the Parramatta LEP 2023 (PLEP 2023). The proposed amendments include increases to the maximum building height and floor space ratio (FSR), and a reduction in the required non-residential floor space, as summarised in the table below. The proposal represents an increase of approximately 190 dwellings (see **Fig 2 & 3**) compared to the yield contemplated under the previously adopted PP controls.

Planning control	Existing development controls (PLEP 2023)	Proposed development controls
Height of buildings	48m	64m
Floor space ratio (FSR)	2.67:1	3.75:1
Non-residential FSR	1,400m <sup>2</sup>	1,100m <sup>2</sup>

**Table 1** - Summary of Proposed Amendments (Source: Rezoning Proposal by Keylan, Sep 2025.)

This uplift is being presented by the proponent as aligning with the principles of the Housing SEPP, which provides a statutory pathway for in-fill affordable housing developments to access bonuses of up to 30% additional floor space and building height when at least 15% of the gross floor area is provided as affordable housing and managed by a Registered Community Housing Provider (CHP) for a minimum of 15 years. In this case, 15,119m<sup>2</sup> of the gross floor area (GFA) will be provided as affordable housing representing 68% of the overall GFA. The uplifted FSR and height rather than being sought by way of established incentive provisions would instead be embedded by way of amended development standards within the PLEP 2023.

While the commitment to affordable housing outcomes is recognised, the extent of the uplift sought comprising an increase in FSR from 2.67:1 to 3.75:1 and height from 48m to 64m must be considered with respect to the broader capacity of the precinct to cater for the uplift and the significant reliance on public transport infrastructure. Noting the adoption of significantly reduced car parking rates for the affordable / co-living housing (122 spaces for 351 apartments).

Importantly, this uplift in development potential is secured permanently through the LEP amendment delivering a time-limited public benefit, with affordable housing limited to a 25-year period. After this timeframe, they may revert to market housing, while the increased building height, density, and traffic/transport impacts remain in perpetuity. This raises concerns about long-term planning equity.



**Figure 3 – View from Hope St (Source: SSD-84348959 - Rezoning Proposal by Keylan, Sep 2025)**

As stated earlier, an overall capacity of 11,000 dwellings within the Melrose Park Precinct is contemplated pursuant to cl 9.5 of the PLEP 2023, with any increase over this figure requiring the concurrence of the Planning Secretary. The proponent has considered the significant developments that have been so far approved or are under construction within the precinct, however, there remains a substantial amount of land within the precinct that is yet to be rezoned or subject to a planning application. In our view the EIS and concurrent planning proposal have not adequately considered the precinct planning implications including the dwelling capacity contemplated.

This is considered to be **a fundamental shortcoming in the assessment** as it does not consider the impact of the development in the context of the precinct and importantly its capacity for the additional yield. Given the significant increase in the number of dwellings sought above the planned density, the increased reliance on public transport infrastructure associated with a scheme providing minimal on-site car parking, and the potential impact on the delivery of the remainder of the Melrose Park Precinct, a far more thorough analysis is warranted.

The SSDA should not be approved until there is an integrated strategic land use and transport review undertaken by Government to determine whether the number of dwellings is appropriate and consistent with supporting and promoting the economic redevelopment of the entire Melrose Park Precinct.





### Impact on GWF Site:

The GWF Site is a major manufacturing plant that is strategic to bread production for the State. Construction traffic movements cannot be allowed to disrupt the operating of the GWF Site by conflicting with the considerable number of vehicle movements servicing the Speedibake Site and Car Park Site.

The traffic operations provided by GWF confirm that the frequency of type of trucks that enter and leave the bakery plant on a regular basis are as follows noting that the truck movements occur between 6am and 8pm. The GWF's operational information is provided in the table below.

GWF Vehicle Type / Movement	Frequency
Heavy trucks (semi-trailers, B-doubles, large rigids)	~29 per day
Medium/large trucks (2-axle)	~18 per week (twice weekly)
Other trucks/vans	~4 per week
Staff vehicles (shift changes)	150–200 cars per change, 3 shifts/day

The impact of construction traffic will be exacerbated by the considerable period over which construction is assumed to occur. The impact on the local road network cannot be considered in isolation or separate to the proposed other major construction works. An integrated local traffic management plan is needed to address the potential cumulative impacts.

Any significant disruption to the operation of the bakery plant runs the risk of requiring GWF to consider relocation of the plant from the site to elsewhere which is a considerable undertaking both in terms of risk, financial impacts and supply constraints in the market for food into NSW.

Sufficient available car parking in the vicinity of the bakery plant is critical for shift workers noting the plant operates for extended hours 6 days per week. In the absence of a Construction Traffic Management Plan, it remains very uncertain as to how many construction workers will elect to use public transport and therefore there may continue to be a significant number of construction workers vehicles in the area during construction.

### Recommendations:

- No on street queuing for construction vehicles be allowed. All queuing should occur on the internal roads within the construction site;
- Provision should be made for parking within the construction sites or within the Melrose Park North Precinct to limit the likelihood of on-street parking; and
- A wider CTMP be prepared that accounts for all surrounding construction works (Melrose Park north and south) and that identifies actions to ensure the impact on the operation of the bakery are minimised. In considering the potential impact on the bakery plant, this wider construction management plan should be prepared and forwarded to GWF as part of the SSDA assessment.

### c) Transport Strategy

The proposal adopts car parking rates for the development under the Housing SEPP for both the affordable housing and co-living component. The use of cl19 of the SEPP as it relates to affordable housing presupposes a development that contains a mix of market residential housing and affordable housing, whereas in this instance the development comprises a significant quantity of affordable housing. **In our view cl 19 SEPP was never intended to guide the car parking required for such a significant proposal** and unreasonably relies upon the construction of the future light rail infrastructure.

The development proposes only 122 parking spaces for 351 dwellings which assumes a significant reduction in private vehicle ownership and usage, instead relying on future light rail infrastructure. Even where light rail exists, mode shift away from private vehicles depends on a complex interplay of factors.

With respect to the supporting TIA, this has relied on modelling for earlier Melrose Park studies (TMAP and DA/1100/2021), rather than undertaking a new, site-specific analysis for the current proposal which considers any change in circumstance nor the cumulative impacts of other planned and approved developments.

Given the overarching issue with respect to dwelling capacity within the Melrose Park North & South Precinct, it is unclear what the impact on capacity would be with respect to the increase in the number of dwellings (from circa 160 dwellings to 351) and noting the increased reliance on public transport infrastructure that would come with the significant reduction in on-site car parking for the proposal.

#### **d) Dust emissions**

##### **Issues:**

The EIS does not include a standalone Air Quality Impact Assessment (AQIA) or equivalent study, despite the significant scale of the proposed works. The EIS provides only broad commentary within the construction management framework, referring to “*management of environmental issues (e.g. odour, dust and noise etc).*”

##### **Impact on GWF Site:**

The GWF Site as a major food (bread) manufacturing facility for the State is highly sensitive to any adverse environmental impacts from surrounding activities, in this instance air quality is critical.

##### **Recommendations:**

A dedicated AQIA should be prepared prior to determination of the SSDA, not deferred post-consent. This should consider the cumulative impacts from surrounding large-scale developments and infrastructure projects in the precinct and the impacts on our client’s facility, and which should be prepared following direct consultation with GWF.

#### **e) Overshadowing Impacts**

##### **Issues:**

The architectural drawings accompanying the EIS include shadow diagrams which distinguish between shadows cast by future development within the Melrose Park North and South precinct, and shadows cast by the proposed development itself. While the design report asserts that building heights and orientations have been carefully planned to respect neighbouring streets and properties, the shadow diagrams nevertheless detail that there will be substantial overshadowing of the GWF site.

##### **Impact on GWF Site:**

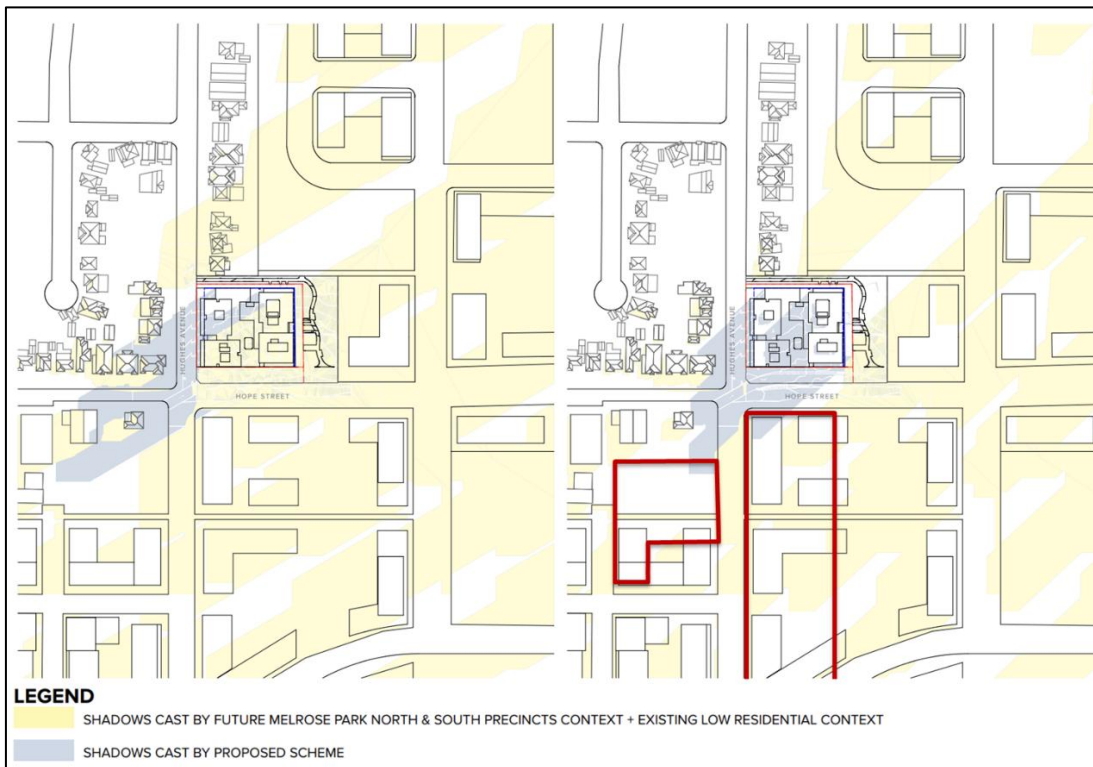
The shadow diagrams prepared indicate that the GWF site will be significantly affected with respect to overshadowing generated by the proposed development and as part of the development of the broader precinct. The shadow diagrams indicate that overshadowing of the northern part of the site will occur between the hours of 10am – 3:30pm (see **Fig 5-8**) as measured on the winter solstice.

##### **Recommendations:**

A revised solar access and overshadowing study is required to address the significant gaps in the analysis. This study should:

- Consider the impacts of a compliant development under the current maximum height of building and floor space ratio development standard;
- Provide a more detailed site-specific analysis on our client’s land with consideration of the future development outcomes contemplated by the structure planning as a baseline;
- Provide clarity with respect to how overshadowing from the broader precinct has been considered as the shadow diagrams are not clear in terms of the assumptions and the distinction between individual sites;
- Provide sun eye diagrams which demonstrate how the proposal will impact upon future development on our client’s land; and
- Give consideration to mitigation measures, such as upper level setbacks, increased tower separation, etc. to maintain equitable solar access to the GWF and public domain.

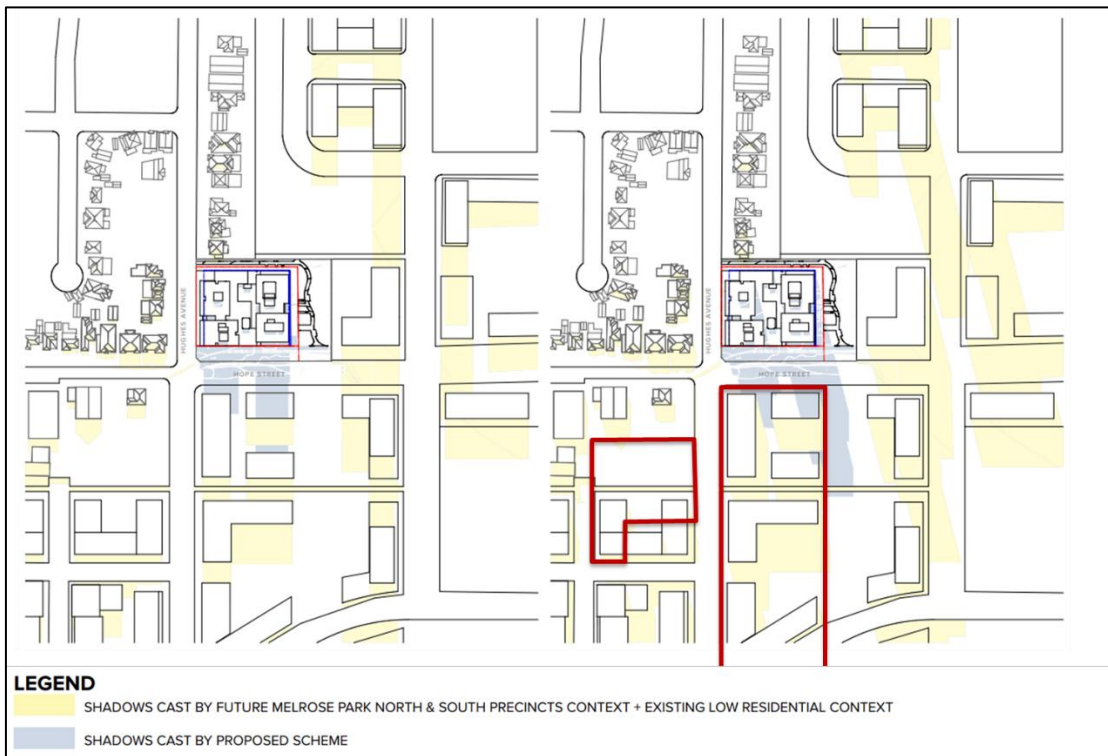




**Figure 5–** Shadow Diagrams, June 21, 9am-10am, GWF Site approximate outlined in Red (Source: SSDA - Architectural Drawings, TURNER, July 2025)



**Figure 6–** Shadow Diagrams, June 21, 11am-12pm, GWF Site approximate outlined in Red (Source: SSDA - Architectural Drawings, TURNER, July 2025)



**Figure 7–** Shadow Diagrams, June 21, 1pm-2pm, GWF Site approximate outlined in Red (Source: SSDA - Architectural Drawings, TURNER, July 2025)



**Figure 8–** Shadow Diagrams, June 21, 3pm-3:30pm, GWF Site approximate outlined in Red (Source: SSDA - Architectural Drawings, TURNER, July 2025)

## 5. Submission Conclusion

On behalf of GWF, we note that high density residential development is contemplated under the Melrose Park precinct structure planning for the subject site. What is not contemplated, however, is the extent to which the proposed dwelling yield and the increased reliance on public transport infrastructure, may impact on the orderly and economic redevelopment of the remainder of the Melrose Park precinct.

The SSDA should not be approved until there is an integrated strategic land use and transport review undertaken by Government to determine whether the number of dwellings and increased reliance on public transport infrastructure is appropriate and consistent with supporting and promoting the economic redevelopment of the entire Melrose Park precinct. Given the scale of the proposed development this is clearly a matter that warrants robust consideration at this stage.

Further to the precinct scale issues, the SSDA has not considered the impact of the proposal on the likely future built form outcomes within adjoining land, including the GWF site, as contemplated by the structure planning for the precinct. Achieving an appropriate built form outcome and level of amenity is important to ensure it does not prejudice future planning outcomes for adjoining land in accordance with the adopted structure plan as a baseline.

The GWF bakery plant is one of the largest bread manufacturing facilities in Sydney and NSW. It is critical that construction traffic resulting from the SSDA not impact on the operations of the bakery plant. Similarly, it is critical that the cumulative impact of the many substantial development works in the vicinity of the bakery plant be considered. A wider construction management plan should be prepared that accounts for all surrounding construction works (Melrose Park north and south) and that identifies actions to ensure the impact on the operation of the bakery are minimised. In considering the potential impact on the bakery plant, this wider construction management plan should be prepared and forwarded to GWF as part of the SSDA assessment.

We thank the Department for the opportunity to comment on the SSDA.



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**Knight Frank Town Planning Sydney**