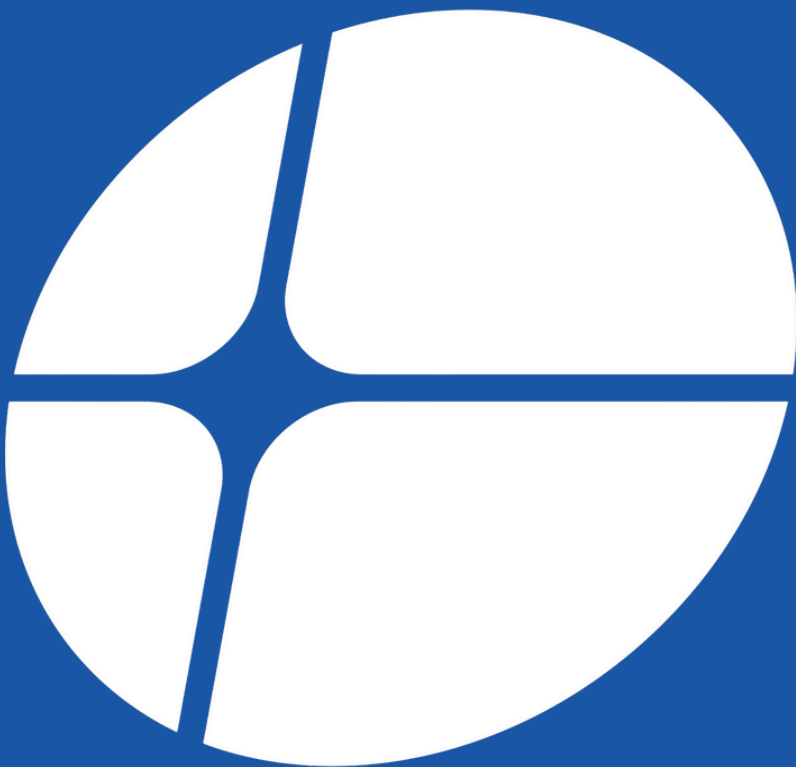


Submissions Report

19 Hope Street, Melrose Park, and 69, 71, 73, 75,
77 Hughes Avenue, Ermington

SSD 84348959



Prepared for Hope & Hughes Pty Ltd ATF Hope and
Hughes Unit Trust
Submitted to DPHI
December 2025

This report has been prepared by:

TBibby

Tom Bibby BPlan
Planner
E: tom@keylan.com.au

SHamilton

Sammy Hamilton BPlan
Principal Planner
E: sammy@keylan.com

This report has been reviewed by:

Padraig Scollard

Padraig Scollard BA MRUP MPIA
Associate
E: pj@keylan.com.au

Michael Woodland

Michael Woodland BTP RPIA
Director
E: michael@keylan.com.au

Disclaimer and limitations

All Rights Reserved. No material may be reproduced without prior permission of KEYLAN Consulting Pty Ltd. While KEYLAN Consulting Pty Ltd working on this project has tried to ensure the accuracy of the information in this publication, it accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this report. This report has relied on information provided by the client in good faith and accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this report.

Table of Contents

1	Introduction	10
1.1	Proposed Development	10
1.2	Report Structure	10
2	Analysis of Submissions	12
2.1	Breakdown of submissions	12
2.2	Categorising issues	13
3	Actions taken since exhibition	15
3.1	Further engagement	15
3.2	Refinements to the project	15
3.3	Further impact assessment	16
4	Response to submissions	18
4.1	Department Submission	19
4.2	Council Submissions	24
4.2.1	Council Submission – Key Issues	24
4.2.2	Council Submission – Detailed Comments	26
4.3	Agency Submissions	55
4.4	Public Submissions	69
5	Updated project justification	78

Figures

Figure 1:	View from south-east illustrating height transition (Source: Turner)	6
Figure 2:	View from south-west illustrating height transition with town centre further east	6
Figure 3:	Updated Landscape Plan to Eastern Parklands (Source: SiteImage)	8

Tables

Table 1:	Overview of submissions	4
Table 2:	SEE Report Structure	10
Table 3:	List of Appendices	11
Table 4:	Breakdown of submissions	13
Table 5:	Categorisation of issues raised in submissions	14
Table 6:	Refinements to the project	16

Appendices

Appendix 1	Submissions Register
Appendix 2	Updated Mitigation Measures
Appendix 3	Response to SDRP 2 Comments
Appendix 3a	Response to City of Parramatta Council Submission Comments
Appendix 4	Architectural Plans
Appendix 5	Landscape Plans
Appendix 5a	Landscape Report
Appendix 6	Retail and Commercial Land Use Assessment
Appendix 7	Preliminary Hazard Analysis
Appendix 8	Evolve Housing Letter
Appendix 9	Response to DPHI Request for Response on Infrastructure and Public Benefits
Appendix 9a	Response to City of Parramatta Council submissions comments on VPA
Appendix 10	Flood Response to NSW SES
Appendix 10a	Flooding Response City of Parramatta Council
Appendix 10b	Flooding Response to the Department of Climate Change, Energy, the Environment and Water
Appendix 11	Embodied Emissions Form
Appendix 12	Subdivision Plan (Torrens)
Appendix 12a	Subdivision Plan (Stratum)
Appendix 13	Internal Civil Plan
Appendix 13a	Public Domain Civil Plan
Appendix 13b	Stormwater Report
Appendix 14	Co-Living Plan of Management
Appendix 15	BASIX Certificate

Executive Summary

This Submissions Report has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Hope & Hughes Pty Ltd ATF Hope and Hughes Unit Trust* (the Applicant) to address the matters raised by Government agencies, Council and the public during the exhibition period for the State Significant Development (SSD) application at 19 Hope Street and 69, 71, 73, 75, 77 Hughes Avenue, Ermington.

This Submissions Report summarises and responds to issues raised both in submissions and by DPHI, following their preliminary review of the SSD. Further, the report provides information of any proposed refinements as well as an updated justification and evaluation of the project as a whole, with regard to the issues raised in the submissions and by DPHI.

On 19 August 2025, the SSD application was lodged with the Department of Planning, Housing and Infrastructure (DPHI). The application was placed on public exhibition from 24 September 2025 to 21 October 2025. During this time, 20 submissions were received from the Department, Government Agencies and the public.

An overview of the agency submissions received is provided below:

Government agencies	Councils
<ul style="list-style-type: none"> DPHI Ausgrid NSW Department of Climate Change, Energy, the Environment and Water Heritage NSW NSW Fire & Rescue NSW State Emergency Services Sydney Water Transport for NSW 	<ul style="list-style-type: none"> City of Parramatta Council (Council)

Table 1: Overview of submissions

On 7 November 2025 DPHI issued a letter to the Applicant requesting a response to issues raised in the submissions together with key issues identified by DPHI. The key issues include:

- | | |
|---|--|
| <ul style="list-style-type: none"> State Design Review Panel recommendations Infrastructure and Contributions Flooding | <ul style="list-style-type: none"> Non-residential floor area Increased height and density Preliminary Hazard Analysis Further consultation with Council |
|---|--|

Since the completion of the exhibition period, the Applicant has undertaken further consultation with DPHI to discuss their key issues and matters raised in submissions. This consultation included a meeting with DPHI on 7 November 2025.

A response to the key matters raised by DPHI is provided below:

State Design Review Panel comments

- A comprehensive response to all State Design Review Panel comments issued following the meeting held on 3 September 2025 is provided at Appendix 3.
- The responses, which includes updated design studies, adequately demonstrate how the proposal appropriately sits in its context and provides for an appropriate transition from the Melrose Park Town Centre to the east to low density dwellings to the west.
- The response also includes further assessment against the Apartment Design Guide to demonstrate the proposal achieves design excellence and increased amenity for future residents.

Non-residential Floor Area

- A Retail and Commercial Land Use Assessment (RCLUA) has been prepared which provides a detailed analysis of the proposed reduction in non-residential floor area at the site (Appendix 6).
- The RCLUA confirms that the reduction in non-residential floor area is acceptable and the overall quantum of such floor area within Melrose Park will adequately serve the future population.
- In particular, the RCLUA identifies that there is an over provision of retail and commercial uses within Melrose Park North based on:
 - The industry standard of 2.2m² of retail floor space per Capita and anticipated population growth; and
 - The shift in market attitudes towards commercial office and consequently the Site and Precinct's role to be one of local convenience.
- The small reduction of non-residential floorspace will therefore not result in any negative economic impacts. Rather, it will contribute to economic activation of the Precinct, whilst contributing to diversity of uses and social infrastructure of the area.

Increased height and density

- The proposed increase in building height from 48m to 64m and FSR from 2.67:1 to 3.75:1 provides for appropriate and strategic uplift in the context of the evolving Melrose Park precinct. This change responds to the site's prominent corner lot location and supports the broader urban renewal objectives of the area.
- The increased height allows the development to better integrate with planned higher density-built form to the east, where the future Melrose Park Town Centre is currently under construction.
- Taller building elements are sited towards the south and east, with the highest tower form located within the south-eastern corner of the site to have the least impacts on the low density residential dwellings along Hughes Avenue.
- The western portion of the site hosts the smaller co-living building, resulting in a shorter built form of part 8 and 9 storeys, ensuring the lowest scale within the development is positioned to adjoin existing low-density dwellings along Hughes Avenue. To mitigate bulk and scale, the two-storey podium along Hughes Avenue, creates an appropriate transition by aligning with the 1-2 storey streetscape of Hughes Avenue.

- The site capitalises on the opportunity to accommodate additional diverse housing and commercial uses in a well-served and accessible location. It enables the site to realise its full development potential and contributes to the vibrancy of the precinct.



Figure 1: View from south-east illustrating height transition (Source: Turner)



Figure 2: View from south-west illustrating height transition with town centre further east (Source: Turner)

Infrastructure and Contributions

- Addisons have prepared two letters which provide a detailed response in relation to the following matters:
 - DPHI's request for response on infrastructure and public benefits (Appendix 9)
 - Council's comments in relation to the VPA (Appendix 9a)
- With regard to the VPA, Addisons have confirmed that the agreement, as entered into under PP-2023 1736, remains relevant to the proposed development (i.e. SSD 84348959) (refer to Appendix 9a):

'The VPA applies to any mixed use development with high density residential purposes that is lodged subsequent to the completion of the Instrument Change and that Instrument Change occurred in April 2025.'
- With regard to infrastructure, works in kind and contributions to be provided by the landowner, Addisons note that the VPA includes the following items (refer to Appendix 9):
 1. *Construction and embellishment of a 2,561m² of open space including maintenance for 2-5 years. A concept design plan is included in the VPA which indicate the landscaping and pedestrian network to be provided.*
 2. *Dedication of the land for the open space park being 2,561m².*
 3. *Dedication to Council of two affordable housing units (whether in the Development or elsewhere in Melrose Park)*
 4. *Payment of a monetary contribution equivalent to 1% of the Proposed Cost of the Development.*
- It is noted that Council's contributions plan continues to apply to the extent that the Planning Agreement stipulates that any residential GFA in excess of 14,067m² will be subject to the relevant Section 7.11 or 7.12 contributions plan. The VPA therefore has a mechanism for dealing with an application that proposes a higher residential density than anticipated at the time the VPA was negotiated.
- A revised Subdivision Plan is provided at Appendix 12. This plan has been updated so the proponent can dedicate the 2,561m² parkland to Council in accordance with the executed VPA. Lots 102 and 103 nominated on the plan of subdivision will be transferred to Council. Lot 103 will eventually be resumed by Transport for NSW for PLR2 as was always intended.

Preliminary Hazard Analysis

- An updated Preliminary Hazard Analysis is provided at Appendix 7 which considers the total population, with respect to SSD applications currently under assessment within Melrose Park South, and verification of the cumulative societal risk.

Further consultation with Council

- Ongoing discussions have been held with Council in relation to the detailed design of the proposed parklands. Updated Landscape Plans have been issued to Council for comment (refer to below figure 3).
- The Applicant also sought to arrange a meeting with Council to discuss their submission, and the Applicants proposed response. Unfortunately, Council was unavailable to meet prior to the lodgement of this Submissions Report.

Notwithstanding, the Applicant is open to meeting with Council following the lodgement of the Submissions Report.

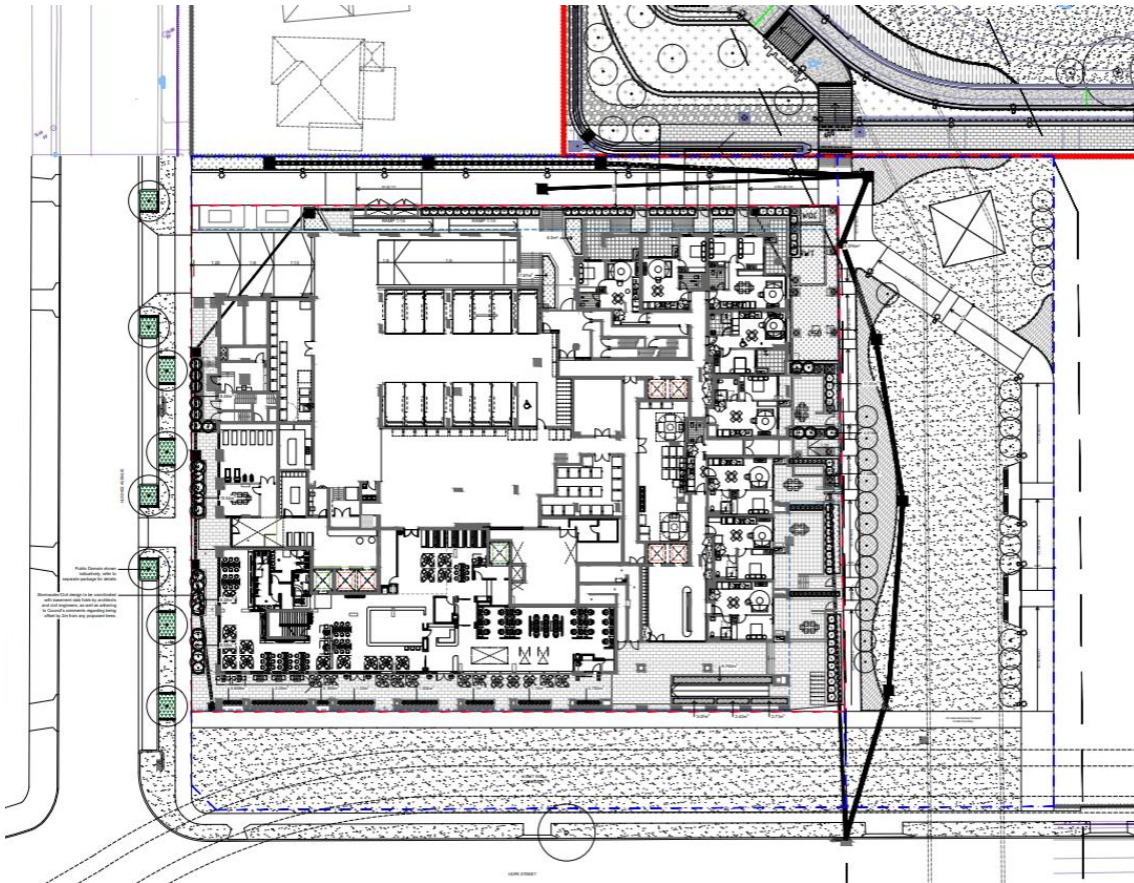


Figure 3: Updated Landscape Plan to Eastern Parklands (Source: Sitelimage)

Other Issues

- SES and Conservation Programs, Heritage and Regulation (CPHR) provided comments that identified several flood-related considerations that require further attention. Additional flood modelling is required, including the incorporation of findings from the Parramatta River Flood Study. The design must ensure safe, rising road access to minimise flood risk.
- The proposal is accompanied by letters from Lyall & Associates that addresses the recommendations provided by the SES and CPHR.

Conclusion

The proposal remains consistent with the overarching strategic planning framework, delivers a high-quality urban design outcome, whilst potential environmental impacts can be appropriately managed through mitigation measures. An updated mitigation measures table is provided at Appendix 2.

On this basis, the proposal is considered to be well justified, noting it will result in significant public benefit as set out below:

- The proposal supports the redevelopment of an underutilised site within the Melrose Park Urban Renewal Precinct.
- The development will provide 197 affordable housing units and 154 co-living units within close proximity the Melrose Park town centre and light rail station, delivering well-located homes near transport, amenities and jobs.
- The proposal is consistent with the strategic planning context including the following strategies:
 - National Housing Accord
 - Greater Sydney Regional Plan
 - Central River City District Plan Housing 2041
 - Future Transport Strategy 2056
 - City of Parramatta Local Strategic Planning Statement City of Parramatta Local Housing Strategy
- The proposal will facilitate a \$136 million investment into the construction of the site and will facilitate over 1,100m² of employment generating floor space.
- The development will support over 216 jobs over the construction period and 26 jobs during operation resulting in significant social benefits for the Parramatta LGA.
- The proposed development will feature a new publicly accessible park, through site links, and large private and public landscaped open spaces
- The site is suitable for the development considering:
 - It is located within an identified Urban Renewal Precinct.
 - The proposed development provides for over 68% of the total GFA as affordable housing, contributing to housing diversity and affordability in the locality.
 - The site is strategically located noting its proximity to Melrose Park town centre, which will provide day to day services and amenities for future residents, and public transport services in the form of the Melrose Park light rail station along with existing bus routes on Hope Street.
 - The proposed development supports a sustainable urban form and gradual densification of the area, responding appropriately to the emerging character of the Melrose Park Urban Renewal Precinct. Accordingly, the site is well-suited to accommodate higher-density housing in line with the strategic planning objectives outlined above.

1 Introduction

This Submissions Report has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Hope & Hughes Pty Ltd ATF Hope and Hughes Unit Trust* (the Applicant) to address the matters raised by Government agencies, Council, the public, and stakeholder groups during the exhibition period for the State Significant Development (SSD) application at 19 Hope Street and 69, 71, 73, 75, 77 Hughes Avenue, Ermington.

On 19 August 2025, the SSD application was lodged with the Department of Planning, Housing and Infrastructure (DPHI). The application was placed on public exhibition from 24 September 2025 to 21 October 2025. During this time, there were 20 submissions received from the Department, Government Agencies and the public.

1.1 Proposed Development

The proposal (as exhibited) seeks to facilitate the construction of a mixed-use development comprising affordable housing, co-living housing and a pub. Specifically, the proposed development comprises the following works:

- demolition of existing buildings on site;
- construction of four separate tower elements ranging from 8 storeys to 18 storeys;
- provision of 197 affordable housing units within the two eastern towers;
- provision of 154 co-living units within the two western towers;
- associated stratum and Torrens title subdivision;
- a pub, providing an active frontage at street level; and
- embellishments within the RE1 zone to provide a public park.

1.2 Report Structure

This Submissions Report has been prepared in accordance with the Department's *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) October 2022*. The structure of the report is as follows:

Section	Overview
Executive Summary	An overarching summary of issues and responses contained within this report.
1 Introduction	A short summary of the project and the assessment that has been carried out to date.
2 Analysis of Submissions	Analysis of submissions, detailing groups and people who made submissions and categorisation of issues raised in submissions.
3 Actions taken since exhibition	An overview of the actions the Applicant has taken since public exhibition to address the issues raised in submissions.
4 Response to submissions	A detailed summary of the Applicant's response to the issues raised in submissions.
5 Updated project justification	An outline of the updated project justification and evaluation of the project, incorporating relevant issues and the Applicant's response.

Table 2: SEE Report Structure

This Submissions Report should be read in conjunction with the following supporting documents:

Supporting documentation	Appendices
Submissions Register	Appendix 1
Updated Mitigation Measures	Appendix 2
Response to SDRP 2 Comments	Appendix 3
Response to City of Parramatta Council Submission Comments	Appendix 3a
Architectural Plans	Appendix 4
Landscape Plans	Appendix 5
Landscape Report	Appendix 5a
Retail and Commercial Land Use Assessment	Appendix 6
Preliminary Hazard Analysis	Appendix 7
Evolve Housing Letter	Appendix 8
Response to DPHI Request for Response on Infrastructure and Public Benefits	Appendix 9
Response to City of Parramatta Council submissions comments on VPA	Appendix 9a
Flood Response to NSW SES	Appendix 10
Flooding Response City of Parramatta Council	Appendix 10a
Flooding Response to the Department of Climate Change, Energy, the Environment and Water	Appendix 10b
Embodied Emissions Form	Appendix 11
Subdivision Plan (Torrens)	Appendix 12
Subdivision Plan (Stratum)	Appendix 12a
Internal Civil Plan	Appendix 13
Public Domain Civil Plan	Appendix 13a
Stormwater Report	Appendix 13b
Co-Living Plan of Management	Appendix 14
BASIX Certificate	Appendix 15

Table 3: List of Appendices

2 Analysis of Submissions

2.1 Breakdown of submissions

During the exhibition period, a total of 9 submissions were received from Government agencies and Council. 11 submissions were received from the public.

A breakdown of the submissions is provided below.

Submission	Breakdown
DPHI	<ul style="list-style-type: none"> • Address State Design Review Panel (SRP) • Retail and Commercial Land Use Assessment • Infrastructure and Public Benefit • High-pressure pipeline • Consult with Council and NSW State Emergency and flood assessment
City of Parramatta Council	<ul style="list-style-type: none"> • Existing Planning Agreement • Further Infrastructure Contributions • Non-Residential Floor Space • Street Wall • Family Dwellings • Hours of Operation (Pub) • Communal Open Space
Ausgrid	<ul style="list-style-type: none"> • Overhead Powerlines in the vicinity • New Driveways – Proximity to Existing Poles
NSW Department of Climate Change, Energy, the Environment and Water	<ul style="list-style-type: none"> • DPHI should request the proponent to obtain a water access licence (WAL) post-approval.
Department of Climate Change, Energy, the Environment and Water (Heritage NSW)	<ul style="list-style-type: none"> • Proposal will have negligible impacts on nearest heritage item (SHR no. 1850).
NSW Fire & Rescue (FRNSW)	<ul style="list-style-type: none"> • FRNSW has no comments or recommendations for consideration
NSW State Emergency Service (SES)	<ul style="list-style-type: none"> • Further flood modelling to be undertaken • Considering results from the Parramatta River Flood Study 2024 as part of the flood assessment for the site • Considering the impacts of climate change • Consider site design which allows for rising road access from the development • Reduce the impact of flooding and minimise risk to the community • Opening of basement (Ramp, vents, etc) is situated above the Probable Maximum Flood (PMF)
Sydney Water	<ul style="list-style-type: none"> • Water Servicing • Wastewater Servicing • Growth Information

Submission	Breakdown
Transport for New South Wales (TfNSW)	<ul style="list-style-type: none"> • Protection of TfNSW Infrastructure and Parramatta Light Rail Operation <ul style="list-style-type: none"> ○ Minimise disruptions to the PLR operation and construction. ○ Provide all relevant documentation as requested by TfNSW for review and endorsement ○ Protect TfNSW infrastructure and minimise disruption to the light rail operation during construction and operation of the subject development • Traffic Impact Assessment <ul style="list-style-type: none"> ○ The traffic generation has been estimated using rates that supersede the Guide to Traffic Generating Developments (GTGD) and associated Traffic Surveys. It should be noted that the traffic generation rates should be based on those outlined in the Guide to Transport Impact Assessment (GTIA), which supersedes the GTGD in 2024. ○ To note, the use of GTGD does not result in a material difference to the outcome of the traffic impact assessment

Table 4: Breakdown of submissions

2.2 Categorising issues

In accordance with the Department's *State Significant Development Guidelines*, the issues raised in the submissions have been categorised in the table below. A response to the issues raised is provided at Section 4 of this report.

Category	Summary of issues raised
The Project	
<i>Design Excellence</i>	<ul style="list-style-type: none"> • Insufficient street wall height along Hope Street • Poor relationship to the Town Centre street wall and built form • Poor transition to Hughes Avenue, 8-9 storeys • Northern boundary lacks surveillance • Tower separation creates a constrained courtyard
<i>Built Form</i>	<ul style="list-style-type: none"> • Proposed height increase from 48m to 64m, and FSR increase from 2.67:1 to 3.75:1 is excessive and does not create appropriate transition.
<i>Non-residential FSR</i>	<ul style="list-style-type: none"> • The existing control of 1,400m² should be retained
<i>Affordable housing</i>	<ul style="list-style-type: none"> • Should be provided in perpetuity rather than the 25 years proposed
<i>State Design Review Panel (SDRP)</i>	<ul style="list-style-type: none"> • Detail response to issues raised in the SDRP comments, and where advice has not been adopted, detail alternative options that have been explored to achieve the objectives

Category	Summary of issues raised
Procedural Matters	
Inconsistency with strategic vision	<ul style="list-style-type: none"> The proposed rezoning is inconsistent with Council's vision for development in the <i>Melrose Park Urban Renewal Precinct</i> Approval would undermine Council's vision for the precinct
Economic, environmental and social impacts of the project	
Traffic – congestion	<ul style="list-style-type: none"> Insufficient parking concerns and overall congestion in the area
Licensed hotel	<ul style="list-style-type: none"> The proposed “pub” usage doesn't align with the local area, insufficient public transport and location too close to the proposed Primary and High School opening 2027
Noise	<ul style="list-style-type: none"> Concerns regarding noise levels from the pub at night Construction noises may exceed controls
Overshadowing	<ul style="list-style-type: none"> Concerns of excessive overshadowing on neighbouring dwellings and businesses
Amenity	<ul style="list-style-type: none"> Insufficient open spaces, and proximity of proposed open spaces to power lines
Construction	<ul style="list-style-type: none"> Noise, traffic and dust throughout construction will cause disruptions
Climate	<ul style="list-style-type: none"> Increased urban heat island effect
Privacy	<ul style="list-style-type: none"> Concerns regarding overlooking of neighbouring properties
Infrastructure	<ul style="list-style-type: none"> Roads, sidewalks, utilities and underground services are not equipped to support development of this magnitude
Wind	<ul style="list-style-type: none"> Development is likely to increase wind
Visual Impacts	<ul style="list-style-type: none"> Bulky form of the towers results in poor visual impact
Landscape	<ul style="list-style-type: none"> Landscaped and deep soil areas inconsistent with controls
Issues beyond the broader scope of the project or not relevant	
Dwelling Creep	<ul style="list-style-type: none"> Dwelling numbers over the maximum number of dwellings determined, from a traffic and transport perspective, that could be accommodated in the Melrose Park Urban Renewal Precinct
Existing Construction of Melrose Park	<ul style="list-style-type: none"> Construction traffic and noise impacts are having a negative impact on the community.
Integrity of the Planning System	<ul style="list-style-type: none"> Approving this development undermines the strategic vision of the precinct.

Table 5: Categorisation of issues raised in submissions

3 Actions taken since exhibition

In response to the key matters raised within the submissions, the Applicant has undertaken revisions to technical inputs to provide clarification to the exhibited proposal. This section outlines the key refinements and additional assessment that have been made to the proposal since its public exhibition.

3.1 Further engagement

The Applicant undertook further consultation with DPHI on 7 November 2025.

This consultation was for the purpose of seeking clarification on key issues relating to the proposal together with matters raised in submissions.

The Applicant also sought to arrange a meeting with Council to discuss their submission and proposed response. Unfortunately, Council was unavailable to meet prior to the lodgement of this Submissions Report. Notwithstanding, the Applicant is this open to meeting with Council following the lodgement of the Submissions Report.

Lastly, the Applicant has issued a detailed response to the Government Architect NSW (GANSW), which outlines the projects response to the SDRP's (second review).

3.2 Refinements to the project

In response to issues raised in the submissions, amendments to the project have been made or alternatively clarification on matters has been provided.

The table below outlines the amendments made. These have been categorised by issue.

Given the proposed amendments are generally minor in nature and are in response to issues raised by DPHI and the submissions, they do not warrant a formal amendment of the DA under section 37 of the *Environmental Planning and Assessment Regulation 2021*.

Category	Summary of project amendments
The Project	<ul style="list-style-type: none">The proposed development is supported by an updated Subdivision Plan (refer Appendix 12). The Subdivision Plan has been updated so that the proponent can dedicate the 2,561m² parkland to Council in accordance with the executed VPA. Lots 102 and 103 nominated on the plan of subdivision will be transferred to Council. Lot 103 will eventually be resumed by Transport for NSW for PLR2 as was always intended.The internal layout of the proposed pub has been revised to orient active areas towards Hughes Avenue, improving street activation. In particular, the south-west corner of the pub is designed with seating looking out to the corner of Hope Street and Hughes Avenue.Window have been added to achieve natural cross-ventilation for apartments across levels 4-8 of the affordable housing component. Over 60% of apartments in the first nine storeys are naturally cross ventilated.The awning design has been amended to ensure continuous weather protection along Hope Street and Hughes Avenue, with no gaps between awning sections, improving pedestrian amenity.

Category	Summary of project amendments
Procedural matters	<ul style="list-style-type: none"> • Project has supplied the following updated / new reports: <ul style="list-style-type: none"> ○ Architectural Plans ○ Retail and Commercial Land Use Agreement (RCLA) ○ Evolve Housing Letter ○ Flood Report ○ Hazard Analysis ○ Landscape Plans ○ Addisons Response to DPHI Request for Response on Infrastructure and Public Benefits ○ Addisons Response to City of Parramatta Council submissions comments on VPA ○ Subdivision Plan
Economic, environmental and social impacts of the project	<ul style="list-style-type: none"> • As requested by the Department, the proposal is accompanied by a Retail and Commercial Land Use Agreement prepared by Atlas Economics (RCLUA) at Appendix 6 of this report. This report has assessed the proposed non-residential floorspace in the context of: <ul style="list-style-type: none"> ○ the expected population of the Precinct ○ the role of non-residential and consequent demand in the Precinct ○ the non-residential floorspace currently being delivered and proposed within the Precinct • The RCLUA also details the relevance of other centres besides the Parramatta CBD in servicing the future population. Furthermore, it determines that the reduced non-residential GFA will not result in any impact on the community. • The landscape design has been revised with consideration of Council and SDRP comments including: <ul style="list-style-type: none"> ○ East-west link has been updated to remove trees to ensure WSUD together to increase passive surveillance. ○ A path to the affordable residential lobby has been integrated in the landscape design. ○ Coordination has been completed with Sekisui House regarding the design of adjoining public open space areas to the north. Levels and pathways have been adapted to create a smooth transition.

Table 6 Refinements to the project

3.3 Further impact assessment

The issues raised in the submissions and in DPHI's comments have been assessed and the following documents have been provided to reflect this:

- Response to State Design Review Panel Meeting 2 Comments
- Architectural Plans prepared by Turner
- Landscape Plans prepared by Site Image
- Retail and Commercial Land Use Assessment prepared by Atlas Economics
- Preliminary Hazard Analysis prepared by Arriscar
- Evolve Housing Letter
- Addisons Response to DPHI Request for Response on Infrastructure and Public Benefits
- Addisons Response to City of Parramatta Council submissions

- Flooding Responses prepared by Lyall & Associates
- Embodied Emissions Form prepared by Construction Consultants
- Torrens Title and Stratum Subdivision Plans prepared by LTS
- Civil Plans prepared by Northrop
- Stormwater Report prepared by Northrop
- Co-Living Plan of Management prepared by Sarah George

The results and findings of the actions discussed in Section 3 of this report are discussed further in Section 4.

4 Response to submissions

This section provides a detailed summary of the Applicant's response to the issues raised in submissions.

The tables in this section have been structured in accordance with the categories identified in Section 2.

4.1 Department Submission

Ref	Summary of Submission	Response
1. State Design Review Panel (SDRP)		
a.	<i>Detail the project's response to the SDRP (second review) advice. This must include illustration of how the SDRP advice has been incorporated into the design of the proposal and where advice is not adopted, detail the alternatives options that have been explored to achieve the same objectives.</i>	A detailed response to the matters raised by the SDRP during its second review of the proposal has been prepared by Turners and is provided at Appendix 3.
b.	<i>Consult with GANSW on the requirement for any further SDRP review.</i>	Noted. The response provided at Appendix 3 has been issued to GANSW.
2. Retail and Commercial Land Use Assessment		
a.	<i>Provide a Retail and Commercial Land Use Assessment to justify the proposed non-residential uses and reduction in non-residential floor area (from the development standard). The assessment is to analyse the implications of the reduction in non-residential floor area coupled with the increase in residential density, including access to local employment and population-serving uses, and economic and community impacts.</i>	<p>A Retail and Commercial Land Use Assessment (RCLUA) has been prepared by Atlas Economics and is provided at Appendix 6 of this report.</p> <p>The report identifies that the non-residential floorspace to be provided within the Melrose Park Town Centre is more than adequate to serve the future residents of Melrose Park. The provision of over 31,000m² of combined non-residential GFA across the precinct will be adequate in servicing the future population despite the additional residential floorspace planned as part of the proposal.</p> <p>The report confirms that there is no under-provision of non-residential space, if anything, there is an over-provision of commercial floor area given the shift in market attitudes towards commercial office space.</p> <p>The report acknowledges that under-provisions of non-residential floorspace can have negative social impacts, however, this is not expected to be the case within Melrose Park.</p>

Ref	Summary of Submission	Response
		<p>The proposed pub will contribute positively to the local economy. The reduction of non-residential floor area will not result in any negative impacts on the precinct, given the overall quantum provided throughout the precinct. Providing non-residential floor space could lead to an inactive frontage or vacant floor space, which is both a poor economic and urban design outcome.</p> <p>The reduction in commercial floor area, therefore, is not expected to result in any economic or non-economic impacts on the Melrose Park Precinct.</p>
3. Infrastructure and public benefits		
a.	<p><i>Identify the mechanism, funding and delivery of infrastructure, works in kind and/or development contributions to be provided.</i></p>	<p>Addisons have prepared two letters which provide a detailed response in relation to the following matters:</p> <ul style="list-style-type: none"> • DPHI’s request for response on infrastructure and public benefits (Appendix 9) • Council’s comments in relation to the VPA (Appendix 9a) <p>With regard to the VPA, Addisons have confirmed that the Planning Agreement, as entered into under PP-2023 1736, remains relevant to the proposed development (i.e. SSD 84348959) (refer to Appendix 9a):</p> <p style="text-align: center;"><i>‘The VPA applies to any mixed use development with high density residential purposes that is lodged subsequent to the completion of the Instrument Change and that Instrument Change occurred in April 2025.’</i></p> <p>Further, Addisons note that the VPA identifies the following infrastructure, works in kind and contributions to be provided by the landowner (refer to Appendix 9):</p> <ol style="list-style-type: none"> 1. Construction and embellishment of a 2,561m² of open space including maintenance for 2-5 years. A concept

Ref	Summary of Submission	Response
		<p>design plan is included in the VPA which indicate the landscaping and pedestrian network to be provided.</p> <ol style="list-style-type: none"> 2. Dedication of the land for the open space park being 2,561m². 3. Dedication to Council of two affordable housing units (whether in the Development or elsewhere in Melrose Park) 4. Payment of a monetary contribution equivalent to 1% of the Proposed Cost of the Development. <p>In accordance with the VPA, development contributions are payable as per Council's applicable Contributions Plan where the residential gross floor area exceeds 14,067m².</p> <p>It is noted that the proposal provides for affordable housing which is exempt under the <i>City of Parramatta (Outside CBD) Development Contributions Plan 2021</i> (COPCP 2021). The remaining residential GFA associated with the co-living housing is 5,846m². Accordingly, the proposal is below the cap within the VPA for residential GFA and therefore contributions for the residential component under the COPCP 2021 do not apply to the development.</p>
b	<p><i>Provide details for the ownership and management of the proposed public park including written evidence from Council regarding dedication, easements for public access, ongoing management plan, and vehicular and service access arrangements.</i></p>	<p>As detailed in Appendix 9, the proposed 2,561m² of open space is to be dedicated to and managed by Council, but only after the public domain works have been completed. The subdivision plan included in the SSDA enables the future dedication of this land as per the VPA.</p> <p>Under the VPA, the developer is obliged to maintain the open space for 2 – 5 years after dedication.</p> <p>The open space park has direct road access at both ends and so no easements for access are required.</p>

Ref	Summary of Submission	Response
c	<i>Provide details of the staging and delivery of public domain works and demonstrate that their interface and integration with the proposed development would be appropriate.</i>	<p>As outlined in Appendix 9, the public domain works and land dedication are to be completed prior to the issue of an occupation certificate for the first residential lot within development. An appropriate condition of consent can be imposed to reflect this approach.</p> <p>This approach ensures the open space will be open and useable in time for future residents. Further, it will be one of the earliest large areas of open space to be delivered in the Melrose Park Precinct, providing amenity to surrounding residents and the wider community.</p> <p>The VPA has confirmed the dedication is to Council once the public domain works are completed. The completion of the SSDA will be required including removal of any structural interface works. This will make sure that the SSDA development doesn't impact on the public domains usability.</p> <p>Landscaping is proposed on the edge of the development to integrate into the newly RE1 Parkland's design.</p>
d.	<i>Provide written in-principle agreement from Parramatta City Council to the proposed infrastructure and public benefits.</i>	<p>Ongoing discussions have been held with Council in relation to the detailed design of the proposed parklands. Updated Landscape Plans have been issued to Council for comment.</p> <p>The Planning Agreement, as entered into under PP-2023 1736, remains relevant to the proposed development. This Planning Agreement was endorsed by the City of Parramatta Council and the associated public benefits remain relevant.</p>
High-pressure pipeline		
	<i>Address the following comments provided in response to the Preliminary Hazard Analysis prepared for the high-pressure pipeline by Arriscar Pty Ltd (Doc No. J-000844-PHA-01, Rev 1, dated 21 October 2025):</i>	Noted, Arriscar Pty Ltd has updated the Preliminary Hazard Analysis (PHA) in light of the below comments and is provided at Appendix 7.

Ref	Summary of Submission	Response
	<ul style="list-style-type: none"> While the methodology and assumptions presented in the report are appropriate, the total population considered in the analysis does not include those introduced from the SSDs lodges and currently under assessment. 	<p>The PHA has been updated to clarify that the methodology and assumptions includes the population increase from the proposal and the SSD applications lodged for Melrose Park South under SSD 71558962 and SSD 71558711.</p>
	<ul style="list-style-type: none"> The current societal risk curve as shown in Figure 10 of the Analysis is very close to the intolerable region. As such, it is important to verify that the cumulative societal risk with consideration of the proposed and approved population can continue to comply with the societal risk criteria. 	<p>The proposed development satisfies the individual fatality risk criteria, as the maximum individual fatality risk is 0.5×10^{-6} and this only occurs when the Gore Bay Pipeline changes direction. The risk level only applies to sensitive land uses (schools, hospitals, etc). The proposed development is outside of the risk contour. Further, the risk criterion for residential land uses in HIPAP No.10 [3], is not reached at any location in the Melrose Park Precinct.</p>
	<ul style="list-style-type: none"> The Analysis is to be updated to include the proposed population from the SSDs that are currently under assessment. Based on our search of the major project portal, the following SSDs are relevant: <ul style="list-style-type: none"> SSD-71558962- Mixed-use precinct with in-fill affordable housing – Wharf Road and Waratah Street, Melrose Park South-East SSD-71558711 - Mixed-use precinct with in-fill affordable housing – Hughes Avenue, Melrose Park South-West 	<p>The updated PHA report now addresses the proposed surrounding developments in the area, including those in Melrose Park South.</p>
Other Issues		
	<p>Consult further with Council in preparing a response to their submission.</p>	<p>As detailed in Section 3.1, the Applicant sought to arrange a meeting with Council to discuss their submission and proposed response. Unfortunately, Council was unavailable to meet prior to the lodgement of this Submissions Report. Notwithstanding, the Applicant is this open to meeting with Council following the lodgement of the Submissions Report.</p>
	<p>Review the advice of NSW State Emergency Service and revise flood assessment documentation and the proposal (where relevant) to support flood modelling and evacuation.</p>	<p>The recommendations provided by NSW SES have been reviewed by Lyall & Associates. A detailed response to each item is provided in the Flooding Response at Appendix 10 and summarised below.</p>

Ref	Summary of Submission	Response
		<p>No further flood modelling is considered necessary as:</p> <ul style="list-style-type: none"> the existing model used (MPURP TUFLOW Model) more accurately defines the nature of flooding in the vicinity of the project; the flood modelling undertaken considered the potential impact that future climate change could have on flood behaviour in the vicinity of the project; the surrounding road network is subject to shallow inundation during a flood event and it is not considered feasible to incorporate rising road access into the design; and the design of the proposed development has been informed by the flood affectation of the site, including proposed finished floor levels.

4.2 Council Submissions

4.2.1 Council Submission – Key Issues

Ref	Key Issue	Response
1	Existing Planning Agreement ('PA') – An existing PA applies to the site. The infrastructure deliverables within this agreement – including a monetary contribution, land/works to provide additional open space and affordable housing dedication – are critical to the proposal. It appears that the terms of the agreement would need to be modified, or a new agreement drafted, to secure this infrastructure.	<ul style="list-style-type: none"> As per the response prepared by Addisons at Appendix 9a, the existing Planning Agreement continues to apply to the proposal. No further Planning Agreement is warranted for the development noting that the terms will be satisfied under this proposal (i.e. under SSD 84348959), including any contributions required to be paid in accordance with Council's contributions plan.
2	Further Infrastructure Contributions – Given the proposed increase in density above the applicable development standards, consideration must be given to whether infrastructure additional to that listed above will be necessary to support the proposed development, and to capture that requirement in the new/ revised PA.	<ul style="list-style-type: none"> As above, no amendments are required to the existing Planning Agreement. Additionally, the Planning Agreement was drafted to foresee circumstances such as that proposed whereby the additional floor area is subject to the existing contributions plans that Council have in place.

Ref	Key Issue	Response
3	Non-Residential Floor Space – The proposed non-compliant under provision of non-residential floor space is not supported, as there is no economic impact statement or justification demonstrating that local employment and population-serving uses will not be adversely affected, especially given the proposed increased residential density and the lack of evidence that Parramatta CBD services can substitute for local provision. Given the increase in residential density, there should be a commensurate increase in non-residential floorspace above the current minimum development standard.	<ul style="list-style-type: none"> • A Retail and Commercial Land Use Assessment has been prepared and confirms that the proposed minor reduction to non-residential floor area will not adversely affect the provision of population serving uses (refer Appendix 6). <p>The RCLUA identifies that there is an over provision of retail and commercial uses within Melrose Park North with respect to industry standard of 2.2m² of retail floor space per Capita. The minor reduction to non-residential floor area within the site continues to ensure that minimum requirements for provision of such floor space are met and that the future population is served by appropriate scale services.</p>
4	Street Wall - The proposal is not sufficiently responsive to site conditions or context, particularly the lack of a well-defined street wall along Hope Street (4-6 storeys) and the lack of an appropriate built form transition from the adjacent low-density development on Hughes Avenue.	<ul style="list-style-type: none"> • The proposed podium facade datum matches the existing and future context as follows: <ul style="list-style-type: none"> ○ The 4 storeys on the eastern side of the site aligns with the podium height along Hope Street and the under-construction Melrose Park Town Centre. ○ The 2 storey street wall datum to the west of the site references the existing context and lower densities along Hughes Avenue and beyond. • This design strategy improves the transition between the Melrose Park town centre to the east and low-density residential dwellings to the west.
5	Family Dwellings – The proposal includes no 3+ bedroom dwellings, which is not consistent with ADG requirements to provide an appropriate mix of housing, including family sized dwellings.	<ul style="list-style-type: none"> • A Letter of Support has been provided by Evolve Housing (refer Appendix 8). • Evolve Housing have specified the required apartment mix to serve the demographic with a demonstrable need for affordable housing within the CS04 Northern suburbs zone for social housing. It is noted that Evolve Housing are also supportive of the agreement to manage the affordable housing for a 25 year period in accordance with the Housing Australia Future Fund Facility agreement.
6	Hours of Operation (Pub) – It is recommended that hours of operations for the pub after midnight be initially subject to a trial period to assess impacts on the amenity of the area.	<ul style="list-style-type: none"> • Noted. The proposed operation hours of the pub will be subject to further licensing approval. The SSD was accompanied by a Plan of Management for the pub that

Ref	Key Issue	Response
		included an acoustic report assessment of the proposed impact. On this basis, the proposed hours of operation are considered acceptable and do not warrant a trial period.
7	Communal Open Space – The narrow and segregated central communal open space is not considered to provide appropriate amenity for future occupants. Combining the space, at the same level, would increase amenity and improve social cohesion.	<ul style="list-style-type: none"> • The separation of the two communal open spaces is required given the two separate stratum lots. This facilitates ease of management for both the co-living and affordable housing components of the development. • Opportunities for social interaction between residents of both the co-living and affordable housing components of the development are facilitated through the delivery of the eastern parklands or the pub.

4.2.2 Council Submission – Detailed Comments

The below table provides a response to the detailed comments provided by Council in their submission. This table incorporates responses from the projects multi-disciplinary team. Turner’s architectural package also includes a version of the below response to Council’s comments but includes images and extracts from the architectural plans to assist with interpreting design matters.

Ref	Summary of Submission	Response
Strategic Land Use Planning		
1	<i>It is recommended that any concurrent rezoning / SSD applications be accompanied by a Letter of Offer (agreed to by Council officers) outlining the additional infrastructure needed to support the proposed development. A condition of consent can require a Planning Agreement be entered into with Council after the development is approved, consistent with the Letter of Offer.</i>	<p>The Planning Agreement as entered into under PP-2023 1736 remains relevant to the proposed development. Advice prepared by Addisons is included at Appendix 9a. This advice confirms that:</p> <p><i>‘The VPA applies to any mixed use development with high density residential purposes that is lodged subsequent to the completion of the Instrument Change and that Instrument Change occurred in April 2025.’</i></p> <p>Addisons also confirm that Council’s contributions plan continues to apply to the extent that the Planning Agreement stipulates that any residential GFA in excess of 14,067m² will be subject to the relevant Section 7.11 or 7.12 contributions plan. The VPA therefore has a mechanism for dealing with an application that</p>

Ref	Summary of Submission	Response
		proposes a higher residential density than anticipated at the time the VPA was negotiated. This addresses Council's concern in ensuring the additional population is accounted for and relevant contributions are paid to facilitate infrastructure as per the relevant contributions plan.
Contributions / Infrastructure		
2	<p><i>An existing PA applies to the site, which requires the delivery of critical infrastructure as part of the redevelopment of the site, including land for open space, embellishment of that open space, 2 affordable housing units dedicated to Council and cash contributions (at 1% of development cost).</i></p> <p><i>The existing PA does not account, in its requirements for quantum of open space delivery, for the light rail corridor the subject application seeks to excise via subdivision. This would need to be amended.</i></p> <p><i>As such, a new Planning Agreement is likely required. The new Planning Agreement must:</i></p> <ol style="list-style-type: none"> <i>I. Replace and revoke the existing Planning Agreement applying to the site; and</i> <i>II. Reflect the increased development yield and associated infrastructure demand arising from the approved development; and</i> <i>III. Resolve inconsistencies introduced by the light rail corridor; and</i> <i>IV. Be executed and registered on title in accordance with Section 7.4 of the Environmental Planning and Assessment Act 1979 prior to the commencement of works.</i> <p><i>If the above recommendation is not supported, then at a minimum, the following condition should be included in the development consent.</i></p> 	<p>As above, advice has been prepared by Addisons (Appendix 9a), which confirms the existing Planning Agreement remains relevant to the proposed SSDA.</p> <p>No further Planning Agreement is warranted for the development noting that the terms will be satisfied by this proposal, including any contributions required to be paid in accordance with Council's contributions plan.</p> <p>The requirements of the Planning Agreement will be satisfied at the relevant stage of the development in accordance with its terms.</p>

Ref	Summary of Submission	Response
	<p>Local Planning Agreement <i>The terms of the Planning Agreement relating to this site—entered into by City of Parramatta Council (ABN 49 907 174 773), Hope & Hughes Pty Ltd (ACN 672 844 549) at Hope and Hughes Unit Trust (Council Reference VPA/9/2024) —must be satisfied at each applicable stage of the development by the parties to the agreement. The Principal Certifying Authority shall ensure that any outstanding requirements of the Planning Agreement are satisfied before issuing any construction or occupation certificate for the development (as relevant to the Planning Agreement timing). Reason: To ensure the terms of the Planning Agreement are met.</i></p>	
Design Excellence		
3	<p><i>Character of Hope Street</i></p>	
4	<p><i>The development does not: “exhibit design excellence that contributes to the natural, cultural, visual and built character values of the City of Parramatta” (LEP c6.13(1)) or adequately address street frontage heights (LEP c6.13(4)(d)(vi) ‘street frontage heights’),</i></p> <ul style="list-style-type: none"> • <i>There is no continuous street wall/ podium of sufficient height of 4-6 storeys.</i> • <i>The street wall / podium does not relate to the street wall podium of the town centre</i> • <i>The street wall / podium does not relate to the proposed built form on the southern side of Hope Street so that a clear entry and exit space to the street is created</i> • <i>The 2-storey section of street wall between the towers A and B does not optimise visual cut off so that the negative visual impact of the towers on the public</i> 	<ul style="list-style-type: none"> • The proposed podium façade datum matches the existing and future context: <ul style="list-style-type: none"> ○ The 4 storeys on the eastern side of the site aligns with the podium height along Hope Street and the Melrose Park Town Centre currently under construction. ○ The two storey street wall to the west of the site references the existing context of lower densities along Hughes Avenue and beyond. • This design strategy improves the transition between low-density residential from the west to the Melrose Park Masterplan on the east.

Ref	Summary of Submission	Response
	<p><i>domain is greater than if the visual focus is on the space of Hope Street.</i></p> <ul style="list-style-type: none"> <i>The development is not a 'gateway', as the project name suggests. A gateway in an urban context is the space/threshold through which you pass i.e. the relationship of the two buildings on the opposite side of Hope Street.</i> 	
5	<p><i>To reinforce the character of Hope Street, provide a sense of entry to the precinct, define the open spaces and minimise the visual impact of the towers the following is required:</i></p> <ul style="list-style-type: none"> <i>This pronounced shift in scale will act as a landmark element, reinforcing the identity of the Melrose Park Masterplan and aiding in wayfinding for residents and visitors.</i> <i>The Hope Street frontage should reinforce the main street character by providing a street wall 4-6 storeys high. This must relate to the scale of the town centre so that the built form creates a continuous edge along Hope Street.</i> <i>The 6-storey street wall on this development will be replicated on the site opposite on the south side of Hope Street. In this way the space between the two street walls creates a sense of entry and exit into the precinct.</i> 	<ul style="list-style-type: none"> The Visual Impact Assessment submitted with the EIS reflects the built form outcome of the precinct following the completion of the Melrose Park Gateway project, along with surrounding developments. The transition from existing 1 and 2 storey low density residential to the west towards the Town Centre to the east is appropriately marked by the development which transitions from 8 to the 18 stories, inclusive of a podium element to soften the proposed scale. This creates a distinct visual cue that provides an entry to the Precinct. This transition in scale from Hughes Avenue to the Town Centre will reinforce the Melrose Park Masterplan and aid in wayfinding for residents.
Interface with Hughes Avenue		
6	<ul style="list-style-type: none"> <i>The building facing Hughes Avenue is 8-9 storeys. It is out of scale with the 1 and 2 storey dwellings that line both sides of Hughes Avenue due to a combination of design decisions.</i> 	<ul style="list-style-type: none"> The western portion of the site has been allocated to the smaller co-living building, resulting in a shorter built form, ensuring the lowest scale within the development is positioned closest to the existing low-density residential dwellings along Hughes Avenue

Ref	Summary of Submission	Response
		<ul style="list-style-type: none"> • A two storey podium has been incorporated along Hughes Avenue to mitigate perceived bulk and scale. Once the podium wraps around to Hope Street, the podium terminates at the affordable/residential building to mark the entry site to the wider Melrose Park Masterplan • The City of Parramatta DCP 2023 building height diagram identifies that secondary towers located across comparable sites are typically within the 8-10 storey range. • The proposed building height therefore reflects the planned structure and is consistent with the future character of the built form within the Melrose Park.
7	<ul style="list-style-type: none"> • <i>The driveway is located 3 metres from the northern boundary. Adjacent residents will be impacted by the traffic entering the basement car park.</i> 	<ul style="list-style-type: none"> • While some increase in traffic is expected with any new development, the proposal incorporates several design measures to minimise impacts on neighbouring residential properties. These measures address both traffic flow and vehicle manoeuvring to ensure safe and efficient access to the loading dock and basement. • In the City of Parramatta DCP 2023, Hope Street is identified as the primary road for the Melrose Park Masterplan. Retaining the driveway along Hughes Avenue, as originally approved under PP-2023-1736, ensures that vehicle movements are concentrated on Hughes Avenue, avoiding disruption or additional traffic along Hope Street. This approach also avoids potential conflicts with the future light rail, which will operate along the sites frontage to Hope Street. • The driveway is set back 3m from the site boundary and 9m from the lot boundary (which includes the through-site link). This setback provides a significant buffer between the driveway and the adjacent residential property, reducing potential noise and visual impacts.
8	<ul style="list-style-type: none"> • <i>The wall along the driveway is proud of the street setbacks of the dwelling houses so that the lower levels will be highly visible from the street in the view</i> 	<ul style="list-style-type: none"> • The wall along the driveway has been retained as it contributes to setting the main built form further back from the boundary, providing a more generous buffer between the existing dwellings to the north and the proposal. This

Ref	Summary of Submission	Response
	<i>to the south along Hughes Street. The visual analysis did not address this interface.</i>	approach creates a smooth transition in scale when viewed from Hughes Avenue.
9	<ul style="list-style-type: none"> <i>The character of the Hughes Avenue interface needs to be reflected in the massing by modulating the length, adjusting the height and the sectional profile.</i> 	<ul style="list-style-type: none"> The existing Hughes Avenue character has been reinforced in the proposed design by matching the two-storey podium height of the surrounding houses and then setting the rest of the building back. This keeps the street scale familiar and comfortable. It is recognised that if neighbouring lots to the north are redeveloped to 6–8 storeys in future (subject to separate planning proposals), their buildings will sit higher than the proposed development simply because the site is on the lowest part of the street. Given the context the proposal ensures the built form appropriately aligns with the character of Hughes Avenue.
Interface with Northern Boundary		
10	<i>The proposed form and external appearance of the development do not improve the quality and amenity of the public domain and will have a negative impact on the proposed improvements to the public domain for the following reasons:</i>	
11	<ul style="list-style-type: none"> <i>Placement of a substation and the driveway to the car parking directly beside the 6m wide public pedestrian path along the northern boundary.</i> 	<ul style="list-style-type: none"> Locating the substations on Hope Street is not feasible due to the Light Rail corridor and the need to maintain safe and practical service access. Substations cannot be placed underground because of flooding constraints and Endeavour Energy requirements, confirmed by AA Power. Positioning the substations alongside the through-site link minimises additional non-active frontages that would result from a chamber substation. Deep soil planting and landscaping help reduce visual impacts, and previous investigations confirmed that an underground option is not viable. While substations are typically positioned on the boundary for servicing, coordination with stakeholders has confirmed they can instead be accessed via the internal driveway.

Ref	Summary of Submission	Response
		<ul style="list-style-type: none"> The design of the through-site link is being further refined in collaboration with Council to reflect their preferences.
12	<ul style="list-style-type: none"> <i>A 1.9m high continuous wall 3m from the pedestrian path along the northern boundary.</i> 	<ul style="list-style-type: none"> The continuous wall is designed to accommodate landscaped areas and planter boxes which soften the northern boundary whilst clearly defining the threshold between public and private spaces.
13	<ul style="list-style-type: none"> <i>There are no views into the courtyard and no views into and out of the courtyard from and to the pedestrian path.</i> 	<ul style="list-style-type: none"> Passive surveillance of the pedestrian pathway is primarily achieved through sightlines from the Affordable Residential lobby and terrace dwellings. Additional overlooking is provided along the northern edge of the co-living communal open space. From a privacy point, it is preferable that the public cannot see into private residential open space areas, whilst residents retain the ability to overlook the pedestrian path for safety. The “co-living” aspect of the proposal relates specifically to shared living arrangements within the co-living building, rather than allowing public access or interaction with private spaces. Opportunities for interaction between the public and private realms are introduced through the designated park on the eastern side, which supports community integration, and through the pub tenancy on the southern side, which provides a more social interface with the public domain.
14	<ul style="list-style-type: none"> By locating the courtyard 5.9 metres above the public domain all the benefits of co-location are lost. 	<ul style="list-style-type: none"> The proposed courtyard level provides an appropriate separation between public and private domains, ensuring resident privacy while still enabling passive surveillance over the public realm from the podium. This maintains safety and visual connectivity without compromising amenity for residents. Public-private integration is still achieved through other elements of the design. The dedicated park on the eastern side of the site offers an opportunity for community interaction, while the pub tenancy on the south provides a more active and sociable interface where residents and the public can engage.

Ref	Summary of Submission	Response
15	<ul style="list-style-type: none"> There is a wall with some vertical louvres of approximately 2metres high and a set of stairs to the courtyard along the pedestrian path interface. 	<ul style="list-style-type: none"> The vertical louvres on the northern façade provide necessary screening to the loading dock and car park level. Minimising interaction with pedestrians. Without these louvres, this elevation would otherwise present as a blank wall. The vertical bronze detailing helps add more visual interest to the northern aspect. The façade composition plays with depth to highlight the northern affordable lobby entrance and the stair access to the communal open space which improves connectivity between the private and public external areas.
Communal Open Space and Tower Separation		
16	<ul style="list-style-type: none"> The Separation between the two towers is 13.3m and 19.2m, resulting in one poorly proportioned shared courtyard between the towers. On Level 01 the COS for Co-living located in the western part of the courtyard is separated by a barrier of levels / planting running north/ south from the COS for Affordable Housing. Because the spaces are narrow and linear the amount of useable area is limited by the planting against the private balconies and the access paths through the spaces. The courtyard on level 01 is deficient in useable outdoor space as it: Separates the COS for the co-living residents from the affordable housing residents. 	<ul style="list-style-type: none"> The separation of the two communal open spaces is required for the two separate stratum lots. Opportunities for social interaction between the two communities of co-living and affordable housing can occur within the open space area to the east or the pub space in the podium.
17	<ul style="list-style-type: none"> <i>Has all landscaping in planters at RL21.3, 600mm above the courtyard level and located above the basement. This further limits at grade activities.</i> 	<ul style="list-style-type: none"> The landscaping softens the boundary edges between affordable and co-living. Without the stepped landscape, the 1.3m wall is more prominent and creates a strong boundary between the two zones.
18	<ul style="list-style-type: none"> <i>Creates two long narrow spaces with entry paths thereby minimising adequate useable area for COS.</i> 	<ul style="list-style-type: none"> According to the ADG, Objective 3D-1 states communal open space should have a minimum dimension of 3m. The proposal adheres to this criterion for both the affordable housing and co-living external spaces.

Ref	Summary of Submission	Response
		<ul style="list-style-type: none"> The affordable housing building also has another level of communal open space on level 15 featuring more amenities and space. The co-living component of the proposal includes internal communal living space and complies with the minimum space requirements as detailed below. The Housing SEPP 2021 provides that for co-living housing containing more than 6 private rooms, a total of at least 30m² of communal living area is required plus at least a further 2m² for each private room in excess of 6 private rooms and minimum dimensions of 3m. 154 co-living units are proposed and therefore 326m² of communal living space required. 326m² communal living space provided
19	<ul style="list-style-type: none"> Is two storeys above the ground and does not provide views to and from the pedestrian pathway on the north. 	<ul style="list-style-type: none"> The landscaping can be appropriately managed on the northern edge of podium to provide views onto pedestrian path. However, it is noted planter will have to remain so trees can be provided for wind mitigation as recommended in the Pedestrian Wind Environment Statement
20	<ul style="list-style-type: none"> Enables overlooking from the northern end of the courtyard into the rear garden of neighbouring Hughes Avenue properties. 	<ul style="list-style-type: none"> The landscape design and the fencing provides sufficient amount of privacy to the low-density residential dwelling to the north. The buffer planting provided at the edge of the communal open space has been carefully designed to enable passive surveillance of the east-west link, while providing a buffer to the neighbouring property to the north.
City Futures		
21	<i>The proposal underprovides non-residential floor space. From an economic outcomes point of view, concerns with this include:</i>	
22	<ol style="list-style-type: none"> <i>This argument partially relies on the idea that one large tenancy is preferable to multiple small tenancies—even if the total non-residential floor space has decreased. Designing something with one</i> 	A Retail and Commercial Land Use Assessment (RCLUA) has been prepared by Atlas Economics and is included at Appendix 6 of this report.

Ref	Summary of Submission	Response
	<p><i>tenancy (e.g. for a pub) does not preclude it becoming separate tenancies in future. This is an operational issue and subject to future development applications, so it should not be given much weight in this process unless the Applicant is proposing a limitation within the controls or consent conditions to safeguard this one tenancy (noting that there may not be precedent for this). Furthermore, multiple smaller tenancies might actually provide a range of uses that appeal to a wide diversity of people and needs within the precinct, and therefore may be preferable. There is also a potential option to provide both one large tenancy and multiple small tenancies. In any case, an Economic Impact Statement is not offered to examine the relative trade-offs of the two tenancy models.</i></p>	<p>The RCLUA identifies that demand for non-residential uses at the site are limited to 'local and convenience retail' and 'purpose-built office buildings'. Melrose Park Town Centre is currently under construction and will deliver 30,000m² of non-residential GFA, with the project site located 150m west of the Town Centre. The Town Centre is heavily retail-focused, with 80% of the non-residential floor area within the proposed Town Centre anticipated to be occupied by retail uses.</p> <p>The demand for non-residential uses on the site is influenced by the needs of the local population. Given the structural changes to office demand (post-COVID-19 pandemic), office occupiers are more selective, and the choice of location is critical. Its unlikely demand for office space will be high in a location such as Melrose Park.</p> <p>The RCLUA outlines that it is widely accepted that 2.2m² of retail space should be provided per each Australian resident. It further concludes that if the Melrose Park North Precinct is to house approximately 11,000 residents, the provision of 24,200m² of retail floorspace would be supportable and sufficient in servicing the future population. Accordingly, the reduction of the minimum non-residential floor area proposed will continue to provide for an adequate supply of retail space and services for immediate and surrounding residents within Melrose Park.</p> <p>The small reduction of non-residential floorspace is therefore not expected to result in any negative economic impacts. Rather, it will contribute to economic activation of the Precinct, whilst contributing to the diversity of uses and social infrastructure of the area.</p>
23	<p>2. <i>This argument partially relies on the cumulative nature of non-residential floorspace in Melrose Park—including applications that are not yet determined. However, there is no Economic Impact Statement or</i></p>	<p>The RCLUA highlights the cumulative nature of non-residential floorspace that has been provided for in the Melrose Park Precinct. The RCLUA examines the proposed loss of residential floor space and deems the economic justification as sound given</p>

Ref	Summary of Submission	Response
	<p><i>detailed justification that examines the proposed loss of non-residential floor space from a precinct-based point of view (including residential and non-residential floorspace), and justifies that the overall economic outcomes (i.e. appropriate provision of population-serving uses, as well as local employment opportunities) are not adversely impacted by the proposed loss on this particular site.</i></p>	<p>the over-provision of retail uses. The future Town Centre, which is located approximately 150m to the east of the site, will be more than adequate in providing services for future residents at Melrose Park.</p> <p>The proposed pub will contribute overall economic activation to the precinct. The reduction in non-residential floorspace is not expected to result in negative economic or non-economic impacts on the precinct and rather provides a complementary use that does not take away from Melrose Park Town Centre.</p>
24	<p>3. <i>This argument partially relies on the fact that PLR 2 provides “easy access to services in the Parramatta CBD.” The presence of public transport does not negate provision of population-serving uses in easy walking distance to people’s homes. Accepting this argument sets an unacceptable precedent that undermines the importance of local services throughout the Local Government Area. The Parramatta CBD cannot be the “neighbourhood shops” for a City with 400,000+ people living in it (future population projection). No Economic Impact Statement is presented to substantiate the substitutability of Parramatta CBD-based services for the loss of floor space ratio here.</i></p>	<p>As provided in the EIA, the relevance of the Parramatta CBD will not be a substitute for the provision of local goods and services. The report outlines that the future residents of Melrose Park, on a per capita basis, are more than adequately provided for from a convenience perspective.</p> <p>Even if the proposed development standard of 1,400m² non-residential GFA was provided at the site, residents would still be required to visit the Parramatta CBD for higher order retail needs.</p> <p>Notwithstanding, residents' are not limited to the services provided in Parramatta CBD. Melrose Park is also located in close proximity to the following centres:</p> <ul style="list-style-type: none"> • Ryde (5-6km) • Rhodes (6-7km) • Sydney Olympic Park (7-8km) • Macquarie Park (8-9km)
25	<p>4. <i>The argument does not address the proposed decrease in non-residential floor space ratio in light of the proposed increase in residential floor space ratio on this site—which would actually suggest more non-residential floor space ratio is required, not less, from both an employment provision point of view and a</i></p>	<p>The RCLUA prepared by Atlas Economics identifies that the non-residential floorspace provided throughout the Melrose Park Town Centre is more than adequate to serve residents of Melrose Park and their needs.</p>

Ref	Summary of Submission	Response
	<i>population-serving uses point of view. Again, no Economic Impact Statement is presented to examine this issue and justify the loss on these terms.</i>	As stated above, the reduction in non-residential floorspace is minor and not expected to result in any negative economic or non-economic impacts on the Precinct.
26	<i>All of these points lead Council officers to recommend that the loss of floor space ratio not be supported—particularly given no Economic Impact Statement has been presented to support the claims. Council officers are available to discuss further or to provide job numbers if that is helpful.</i>	Noted. The RCLUA appropriately demonstrates that the minor reduction in non-residential floor space at the site will continue to ensure more than enough retail and commercial services are provided to future residents in Melrose Park North.
Stormwater Engineering		
Overland Flow		
27	<i>The flood modelling shows an overland flow path along the northern boundary that has parallel sides and a depth of about 600 – 700mm. This suggests a channel or flow path containment of some kind along the boundary which is not consistent with the wide pathway and landscaping being proposed. Along the same flow path further east, the model shows flow overlaying the toe of the batter to the adjoining future parklands (Sekisui site). This does not appear to be correct as flow could not be present on the slope of the batter. This flow should be spread out across the pathway and landscaped area alongside it, so it is not flowing deep or with unduly high velocity. Please amend details of the pathway, landscaping and other treatments adjacent to the northern edge of the site and flood model the amended design to demonstrate this.</i>	<ul style="list-style-type: none"> • Updated flood modelling has been undertaken and attached to Lyall & Associates response letter at Appendix 10a. • The updated flood modelling shows appropriate pathway, landscaping and other treatments have been proposed to accommodate flows within the site and do not result in any adverse offsite impacts.
Pre and Post Development Flows at Site boundaries		
28	<i>A comparison table of pre-development and post-development flows needs to be included at boundaries (pipe flow, overland flow and combined flow exiting the subject site at each location).</i>	A comparison table is provided in the Response to City of Parramatta Council prepared by Lyall & Associates at Appendix 10a.
29	<i>An electronic copy of TUFLOW Model, with all relevant files, and with a brief report outlining model inputs, boundary conditions, assumptions, impact analysis, pre-</i>	The response to the City of Parramatta Council, prepared by Lyall & Associates notes that a “copy of the latest set of DRAINS and

Ref	Summary of Submission	Response
	<i>development and post development comparison flows & levels at relevant locations, overland flow paths and flood storage changes, results, and recommendations must be provided.</i>	<i>TUFLOW electronic model files has been provided along with this letter and our FIRA dated 11 August 2025".</i> These documents provide a comprehensive understanding of model development and flood behaviour under pre- and post-development conditions.
Stormwater Systems		
30	<i>For the stormwater systems which will become Council's asset upon dedication or any changes to the Council's existing stormwater system, the following needs to be submitted along with the application;</i>	
31	<ul style="list-style-type: none"> <i>A set of design drawings relevant for existing or proposed stormwater system to be handed over to the council. A separate set of full civil drawings should also be included for reference.</i> 	Appendix 13, 13a, and 13b show the relevant set of plans for the stormwater system and include the internal and public domain plans. These include the proposed stormwater system.
32	<ul style="list-style-type: none"> <i>An electronic copy of DRAINS model needs to be submitted along with the electronic copy of the sub-catchment plan and brief report to demonstrate adequacy and appropriateness of the drainage infrastructure.</i> 	The response to the City of Parramatta Council, prepared by Lyall & Associates (Appendix 10a) notes that a <i>"copy of the latest set of DRAINS and TUFLOW electronic model files has been provided along with this letter and our FIRA dated 11 August 2025"</i> .
33	<ul style="list-style-type: none"> <i>Appropriate tail water conditions should be incorporated in the model.</i> 	A tailwater level of 9.87 has been adopted. Please refer to Appendix 13b.
34	<ul style="list-style-type: none"> <i>Climate change needs to be incorporated in the model as a design case.</i> 	Climate change was incorporated in the original flood model as per the submitted Flood Impact and Risk Assessment (See Section 6 and 7 of original report and Figure 27).
35	<ul style="list-style-type: none"> <i>All private and public drainage infrastructures need to be design for 5% AEP with 50% blockage in sag pits and 20% blockage in on-grade pits with safe overland flow in 1% AEP with the climate change.</i> 	As detailed in Appendix 13b, to accurately represent upstream inflows, the hydrographs from Lyall & Associates' flood model were imported into DRAINS for the 5% AEP and 1% AEP + climate change events. The design intent is for the proposed pit and pipe network to convey the full 5% AEP flow, while allowing controlled ponding and overland flow during the 1% AEP + climate change event. In both cases, surcharging at the Hope Street pit is predicted, consistent with its existing function in the drainage system.

Ref	Summary of Submission	Response
36	<ul style="list-style-type: none"> • <i>Stormwater Drainage Plan and Longitudinal Section</i> <ul style="list-style-type: none"> ○ <i>Stormwater Drainage Plan and longitudinal sections shall also include horizontal and vertical position of all existing and proposed service utilities.</i> ○ <i>All Longitudinal drainage sections shall include the Hydraulic Grade Line for 5% AEP and 1% AEP (with Climate Change).</i> ○ <i>All pipes class need to be designed for heavy vehicular loading with consideration during construction and post-construction loading. Pipe class shall be no less than Class 3. All Pipes to be Reinforced Concrete Spigot and Socket Rubber Ring joint type. This information shall also be included in the longitudinal sections.</i> 	<ul style="list-style-type: none"> • Refer to Melrose Park Gateway Civil Plans and Report (Appendix 13, 13a and 13b)
37	<ul style="list-style-type: none"> • <i>All stormwater drainage design details are to be in accordance with council standard drawings. All pits shall be designed and constructed in accordance with council standard drawings. The design drawings shall include, but not limited to the following details;</i> <ul style="list-style-type: none"> ○ <i>A detailed Pit Schedule with Pit ID, type and size of the pit, type and size of the pit cover, lintel size, reference to the drawing (such as council standard drawing number, custom pit etc)</i> ○ <i>Any custom designed pits and council standard pits with depth greater than 2.5m shall include structural details and structural certifications referring drawing sheet details from registered structural engineer.</i> ○ <i>All pit cover/ grate should be class D heavy duty, galvanised, bike safe and bolted down type.</i> 	<p>Updated Civil Plans prepared by Northrop have been designed in accordance with Council standards (Appendix 13, 13a and 13b).</p> <p>The stormwater drainage design has incorporated WSUD elements as discussed within the Stormwater Report submitted with the original EIS. This includes:</p> <ul style="list-style-type: none"> • 17 x 690mm Ocean Protect Psorb StormFilter Cartridges • 30kL Total Rainwater Tank storage • 1 x GPT CDS Nipper

Ref	Summary of Submission	Response
38	<ul style="list-style-type: none"> Stormwater Drainage Design should consider proposed WSUD elements. 	
Water Sensitive Urban Design		
39	<p>The stormwater report mentions Liverpool Rainfall Station has been adopted for water quality modelling. Electronic copy of MUSIC Model with the relevant background should be submitted to council for review. Rainfall Station should be PARRAMATTA NORTH MASONS DR (66124) 6 minutes data from 1988 to 1998 (10 years). It is also available in MUSIC-Link for MUSIC_X. 5.</p>	<p>An updated Stormwater Report prepared by Northrop is provided at Appendix 13b, this responds to the request from Council. The associated MUSIC modelling will be issued to both DPHI and Council.</p>
Impacts on Council's existing infrastructures including stormwater systems		
40	<p>Details on impacts on council's existing infrastructures including stormwater systems and required relocation/upgrades need to be included in the report in a separate section of the report.</p>	<p>The updated Stormwater Report confirms that the proposal has negligible impacts on Council's existing infrastructure.</p>
Public and Private Assets (Existing and Proposed)		
41	<p>A map clearly showing proposed and existing public and private stormwater/flooding assets need to be provided.</p>	<p>The RTS is accompanied by Internal and Public Domain Civil Plans at Appendix 13 and 13a that indicate the stormwater assets to be provided on-site.</p>
Trees & Landscaping		
Level 01 Plaza Communal Open Space Design		
42	<p>Level 01 Plaza Communal Open Space Design</p> <p>The co-living communal open space ('COS') and the affordable housing COS are located within the central plaza but have been segregated by a 1.6m level difference (plus a 1m high planter to the upper level = 2.6m retaining wall). The affordable COS portion of the space is oppressive with limited useable spaces provided. It is mainly a circulation corridor and does not meet the ADG requirements..</p>	<ul style="list-style-type: none"> The two communal open space areas are proposed to be stratum subdivided to service the two different residential uses at the site. On this basis, they must be separated. The Affordable communal open space exceeds the minimum required area under the Housing SEPP 2021 and exceeds ADG requirements. The proposal complies and exceeds the ADG requirements for provision of communal open space for the affordable housing component as follows: <ul style="list-style-type: none"> Total affordable housing site area = 2,841m² Minimum communal open space must be 25% of Site Area = 710m²

Ref	Summary of Submission	Response
		<ul style="list-style-type: none"> ○ Provided communal open space = 790m²/ 27.8% ● 80% of communal open space receives at least 2hrs of direct sunlight, exceeding the minimum 50% under the ADG ● The proposal complies and exceeds the minimum requirements of the Housing SEPP 2021 for communal open space provision for co-living housing as follows: <ul style="list-style-type: none"> ○ Total co-living site area = 3,084m² ○ Minimum communal open space must be 20% of site area = 617m² ○ Provided communal open space = 686m²/ 22.2%
43	<p><i>The COS on level 01 is to be redesigned to ensure it meets the ADG requirements design objectives and guidelines as described in Part 3D of the Apartment Design Guide (ADG) for all to benefit and enjoy.</i></p> <p><i>As a minimum, the level 01 communal open space (co-living and affordable) must be designed as one, integrated space including equal access across the courtyard. It is to be designed to be attractive and inviting, have a variety of useable spaces with a range of passive and active functions, including opportunities for various groups sizes and individual recreation, direct solar access and incorporate direct and equal access to the communal open spaces from common circulation areas, entries and lobbies.</i></p>	<ul style="list-style-type: none"> ● The height difference highlights the separation of the spaces for the separate stratum lots and associated uses. The landscape plan illustrates how the landscape softens the visual divide through stepping planter boxes utilising the concrete fold to create deeper soil depths, allowing for larger mature trees. ● The proposal adheres to and exceeds minimum provisions of the ADG. It is noted that the ADG is not relevant to the co-living component of the proposal and is only subject to the Housing SEPP 2021 requirements which it complies with. ● Communal open space for the affordable housing component exceeds the minimum requirement of 25% of the site. This provides a quality and high level of amenity at the site. ● The proposed development achieves a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9am and 3pm mid-winter, complying with ADG requirements. <p>Co-Living Building</p> <ul style="list-style-type: none"> ● The proposed development is compliant with Chapter 3, Part 3 <i>Co-living housing</i> of the Housing SEPP, which includes but is not limited to the following: <ul style="list-style-type: none"> ○ Communal Open Space Area (External) ○ Communal Open Space Dimensions

Ref	Summary of Submission	Response
		<ul style="list-style-type: none"> ○ Communal Open Space Solar Access ○ Communal Living Space Area (Internal) ○ Communal Living Space Solar Access ○ Canopy Coverage <p>Affordable Building</p> <ul style="list-style-type: none"> ● Additional communal open space is provided on the rooftop (level 15) for the affordable housing component and receives direct sunlight from 9am to 3:30pm for more than 50% of the site. ● Spaces are usable, for interaction, enjoying the direct sunlight, activities and play, a space to be immersed in natural elements, a space to enjoy the outdoors. ● The proposed communal open space provides direct access between the proposal and Western Parklands and/or park on the eastern side through external steps. Connecting private to public domain.
Planters		
44	<i>Many of the planters are too narrow, some are as little as 0mm to 200mm.</i>	Noted. Landscape Plans at Appendix 5 have been revised and amended to suit the proposed changes.
45	<i>All planters are to increase to minimum 1.5m wide. Additional buffer screening is required within the central plaza, adjacent to the private balconies to provide adequate privacy and amenity to these private courtyards.</i>	
46	<i>Planters adjacent to the private balconies should be a minimum 2.5m wide to ensure there is adequate privacy screening and amenity achieved.</i>	
47	<i>The planting plans are to be adjusted accordingly.</i>	
Trees / Infrastructure		
48	<p><i>It is recommended the following points are addressed in the amended landscape plans:</i></p> <ul style="list-style-type: none"> ● <i>All trees are to be setback a minimum 3m from the edge of a building foundation or building façade.</i> 	<ul style="list-style-type: none"> ● The updated Landscape plans at Appendix 5 reflect these recommendations whilst ensuring there is enough deep soil to facilitate trees to grow to a mature age.

Ref	Summary of Submission	Response
	<p><i>Where this is not feasible, replace the species with a fastigiate (narrow) form alternative tree species. Council does not support heavy (asymmetrical) pruning for building clearance.</i></p> <ul style="list-style-type: none"> <i>Ensure the location of the trees within the planters have enough clearance from the adjacent retaining wall or paving edge to ensure the rootballs will not clash with the infrastructure, footing and/or haunching. Council does not support root balls being 'cut to fit' a space.</i> <i>Trees are to be located a minimum 2m from any stormwater line of pit.</i> <i>Stormwater pits and pipes are to be indicated on all landscape plans for coordination.</i> 	<ul style="list-style-type: none"> Trees have been setback from the building at a minimum of 3m where possible. Fastigiate species are to be used in circumstances where an increased setback cannot be provided. Tree rootballs will be offset from walls and other structural elements.
Planting on Structure		
49	<p><i>The soil depth and volumes on structure, indicated over the OSD, within the treepit (Hughes Avenue), on the central plaza, the L15 roof terrace and as indicated on the planting on structure typical details do not meet the minimum Apartment Design Guide (ADG) – Part 4, 4P Planting on Structures requirements. It is recommended the following points are addressed in the amended landscape plans:</i></p>	
50	<ul style="list-style-type: none"> <i>Additional minimum dimensions are to be added to the typical details to ensure the minimum ADG soil depths are met.</i> 	<ul style="list-style-type: none"> Noted. The proposed development includes soil depths that have been identified within Landscape Plans and a tree pit for Hughes Avenue planter boxes.
51	<ul style="list-style-type: none"> <i>The m3 calculations for each planting area should be added to ensure there is sufficient soil volume available for the proposed trees within each planter to meet the ADG 4P planting on structure requirements and to ensure the proposed planting will thrive.</i> 	
52	<ul style="list-style-type: none"> <i>A treepit detail for the trees within the front setback of Hughes Avenue, above the basement structure, is required to ensure adequate soil volume is achieved under the paving areas to support the mature growth of these trees. A structural pavement system is recommended such as a suspended concrete slab or structural soil or modular cells below the paving to</i> 	

Ref	Summary of Submission	Response
	<i>mitigate against soil compaction and to maximise aeration and porosity in the tree root zone. The base of the tree pit shall incorporate a drainage layer and pipe that connects to nearest stormwater pit.</i>	
Plant Mixes		
53	<i>The plant mixes have not considered the solar orientation. The mixes are to be amended to ensure plants will thrive in the different locations (sun/shade).</i>	Noted. Plant mixes have been amended to suit solar orientation and outline plant quantities/m ² within the planting schedule of the Landscape Plan (Appendix 5).
54	<i>Feature shrubs and hedge species to be identified as a minimum.</i>	
55	<i>Plant quantities/m² to be added to the planting plans and schedule.</i>	
L15 Planting		
56	<i>Replace the Flindersia australis (Fa) large tree on the podium roof terrace with a smaller species suited to this harsh environment.</i>	Noted. Tree species have been updated at the proposed Level 15 (Rooftop). Refer to updated Landscape Plans (Appendix 5).
Tree Details		
57	<i>Trees should be self-supporting from the nursery. It is recommended the tree stake is deleted from the typical tree detail.</i>	Noted. Typical Tree detail amended and provided by SiteImage (Appendix 5).
58	<i>Underground guying is recommended to secure the new trees on the podium structure to avoid visual clutter.</i>	
59	<i>Tree planting details must show compacted sub grade area under the root balls to mitigate against subsidence.</i>	
Deep Soil Program		
60	<i>The deep soil diagram is incorrect and misleading. It should be amended to ensure the total deep soil zone calculations only measure a minimum dimension of 4m x 4m. (Note: impervious surfaces and soil on structure are not to be included in the deep soil calculations).</i>	<ul style="list-style-type: none"> • The deep soil diagram has been updated to remove the deep soil calculations using the 4m x 4m sections and updated calculations to match. • Th proposed deep soil area, excluding the light rail corridor, equates to 1,300m² or 15.3% of the site area. • This exceeds the minimum 7% deep soil requirement under the ADG.

Ref	Summary of Submission	Response
Tree Protection		
61	<i>The street trees are to be retained and protected. Tree protection measures are to be implemented for the trees located adjacent to the site prior to demolition and during construction. The fencing is to be in place for the duration of the construction works. "Tree Protection Zone" signage must be attached to the protective fencing.</i>	Noted. This can be reinforced through appropriate conditions of consent for the trees proposed to be retained.
City Strategy		
Co-living Component		
62	<ul style="list-style-type: none"> • <i>Revise affordable housing mix to include three-bedroom units for families.</i> • <i>Increase communal open space to at least 20% of the site.</i> • <i>Provide a Plan of Management for co living and specify manager's workspace.</i> • <i>Investigate affordable housing in perpetuity rather than a 25-year limit.</i> • <i>Update the pub's Plan of Management post-liquor licence.</i> • <i>Review and mitigate internal noise transmission between pub and residences.</i> 	<p>A Letter of Support has been prepared by Evolve Housing, the nominated Community Housing Provider for the project, and is included at Appendix 8.</p> <p>This letter confirms that Evolve Housing has provided feedback and input throughout the design process in order to optimise the unit mix, amenity and suitability of the proposed Affordable Housing dwellings for the residents, the community and for the long-term maintenance and management of the assets.</p> <p>As part of their consideration, Evolve Housing reviewed ABS data and SGSEP Rental Affordability Index. From this review Evolve Housing determined the proposed unit mix was appropriate in order for the project to help meet current demand.</p> <p>As provided for in the submitted Noise and Vibration Impact Assessment prepared by Acoustic Logic, appropriate acoustic mitigation measures can be implemented to reduce any potential impacts on futures residents from the pub. These have been included within the submitted Mitigation Measures and includes the following:</p> <ul style="list-style-type: none"> • <i>enhanced façade design with laminated glazing and acoustic seals to manage patron and music noise</i>

Ref	Summary of Submission	Response
		<ul style="list-style-type: none"> • <i>ventilation of residential units to ensure windows can remain closed while maintaining internal comfort</i> • <i>operational management to control late-night noise spills</i> • <i>compliance with Liquor Act through internal noise design and façade separation</i> <p>The above will be referenced as part of any conditions imposed.</p>
63	<ul style="list-style-type: none"> • <i>Reconfigure communal indoor space for quality and usability.</i> 	<p>For co-living housing containing more than 6 private rooms, a total of at least 30m² of communal living area is to be provided plus at least a further 2m² for each private room in excess of 6 private rooms with a minimum dimension of 3m.</p> <p>The proposal includes 154 co-living units, therefore 326m² of usable internal community living space is required. A total area of 326m² of co-living community living space is provided over 5 levels with varying uses, including:</p> <ul style="list-style-type: none"> • Communal kitchen area with an accessible bathroom • Several media rooms • Collaborative booth seating • Utilises circulation spaces for office working spaces • Meeting room which can be booked for varying uses
64	<ul style="list-style-type: none"> • <i>Ensure clear delineation between private and public park areas</i> 	<ul style="list-style-type: none"> • The design ensures that the privacy of ground-level residential apartments is maintained while providing outlooks that enable passive surveillance of through-site links and pedestrian footpaths surrounding the site. • This is achieved through the level difference between the ground plane and terrace homes, which naturally separates private and public areas. • The height difference between the ground plane and communal open space further provides the distinction between the public and private.

Ref	Summary of Submission	Response
Parks & Open Space		
Open Space Design		
65	<i>No direct private building entrances are to be located within the dedication land to maximise useable open space and prevent privatisation.</i>	<ul style="list-style-type: none"> To preserve the link and usability for residents to utilise the public external open space and to improve interaction with public spaces, a path to the affordable residential lobby has been integrated in the landscape design located on the eastern edge of the park.
66	<i>Pathway required along the western edge to clearly delineate the boundary between public and private domains.</i>	<ul style="list-style-type: none"> A pathway has been provided along the western edge of the proposal to ensure a delineation between public and private.
67	<i>Request sections to clearly illustrate levels within the dedication land.</i>	<ul style="list-style-type: none"> The design of the eastern parklands is to be further coordinated with Council. SiteImage has coordinated meetings with Council. The first and most recent meeting was held on the 29 September 2025. On 19 November, 3 and 9 December 2025 updated landscape design iterations were issued to Council. In particular, these plans ensure: <ul style="list-style-type: none"> The Park Design connects with the Sekisui House Western Parklands The pathways are all accessible The overland flow path is working Councils' comments from previous meetings is incorporated.
68	<i>Dedicated access point required for maintenance vehicles to undertake regular activities.</i>	<ul style="list-style-type: none"> Access to the parklands is to occur from the north, through adjacent parkland, given the future light rail adjoining the site's southern boundary.
69	<i>Incorporate seating nodes at regular intervals to maximise amenity.</i>	<ul style="list-style-type: none"> As shown in the Landscape Plans, seating is provided throughout the proposed park to maximise amenity.
Furniture and Materials		
70	<i>Furniture and materials palette to be consistent with the Melrose Park Public Domain Guidelines (a copy of which is available upon request) to ensure a cohesive public open space network throughout the precinct.</i>	<ul style="list-style-type: none"> Site Image will continue to further discuss furniture and material with Council at this eastern park noting it will be designated to Council. Previous consultation has been

Ref	Summary of Submission	Response
71	<i>Minimise trees directly under high voltage powerlines to prevent future conflicts and associated maintenance frequency (Ausgrid recommend trees with a maximum height of 3m under pylons).</i>	<p>undertaken to inform the proposed design, including a meeting on 29 September 2025.</p> <ul style="list-style-type: none"> Indicative street lighting is shown on the latest landscape design provided to Council on 19 November 2025 and 3 and 9 December 2025. We are awaiting Council's confirmation for this design.
72	<i>Furniture and fixtures are to comprise durable materials with a long asset life (i.e. metal) and timber is to be avoided (Ausgrid seeks limiting and/or grounding of metal fixtures under power lines).</i>	
73	<i>Maintenance vehicle surfaces are to be capable of accommodating heavy vehicles consistent with Council's Standard Detail (DS6 - Type 2) and any applicable Ausgrid standard.</i>	
Trees, Turf and Gardens		
74	<i>Reduce garden beds to maximise the availability of useable open space (i.e. kickabout).</i>	<ul style="list-style-type: none"> The Landscape Plans have been updated as necessary (Appendix 5).
75	<i>Planting palette is to be consistent with the adjoining Western Parklands to ensure cohesiveness (see Council approval ref: DA/460/2024).</i>	
76	<i>Remove <i>Carpobrotus glaucescens</i> and replace <i>Dianella prunina</i> with <i>Dianella tasmanica</i> as undesirable species.</i>	
77	<i>Turfed areas to be a minimum of 2m wide for mower access clearances.</i>	
Public Domain		
Consistency of materials, details an street furniture throughout the Public Domain, Parks and Publicly Accessible Private Areas		
78.Public Domain	<ul style="list-style-type: none"> Choice of materials and street furniture within the parks, through site links and the public domain should be consistent throughout the precinct, the details for which are provided in the Melrose Park Public Domain Guidelines The applicant should liaise with Sekisui House for the work taking place in the Melrose North Precinct which is north of the current site. 	<ul style="list-style-type: none"> Coordination has been completed with Sekisui House regarding the design of Western Parklands and the connection to the eastern public park proposed under this application. Levels and pathways have been adapted to create a level transition between Sekisui's site and Melrose Park Gateway. Site Image coordinated a Landscape Design Session with Council on 29 September 2025 and discussed their concerns.

Ref	Summary of Submission	Response
	<ul style="list-style-type: none"> A meandering path as proposed is not a good outcome for the park, as it renders the space between the path and the actual lot boundary as private. The applicant should install a public footpath, 2 m wide, at the western edge of the public open space (along the building lot boundary) to delineate the private v/s public land. Please also ensure all levels and level changes are shown accurately in the drawings A through site link, 4m wide, This link should have 24/7 lighting as required by all other links in the precinct. 	<ul style="list-style-type: none"> On 19 November and 3 and 9 December 2025 updated landscape design iterations were issued to Council. In particular, these plans ensure: <ul style="list-style-type: none"> The Park Design connects with the Sekisui House Western Parklands The pathways are all accessible The overland flow path is working Councils' comments from previous meetings have been incorporated. Further consultation will be undertaken with Council regarding the overall detailed design of the park, post approval. The path within the through site link has been amended to have 4 metre wide walking path adjacent to the 2m wide vegetation strip from the northern boundary as requested. This link will include sufficient lighting which will be further coordinated at the post-approval stage.
79. East West Through Site Link	<ul style="list-style-type: none"> An east west link, 4 m wide, with materials and finishes to match, including lighting, must also be provided on the northern boundary of this site, to connect westward to Hughes Avenue. This link should be set back 2m from the northern boundary to enable a planted edge. 	<ul style="list-style-type: none"> Paths have been updated to include 2m wide planted edge adjoining the northern boundary. A 4m wide pathway is provided between the planted edge and the building.
80. Public Domain along Hughes Avenue	<ul style="list-style-type: none"> The public domain along Hughes Avenue that abuts the current site needs to be shown as part of these drawings as well as be included and delivered as part of SSDA. This public domain must be constructed to Council Standards. This cross section is based on the overarching Melrose Park precinct Masterplan. This public domain should house a 3m shared path and a verge with trees. The existing trees long Wharf Road need to be retained, so if a 3m shared path is not possible to be provided along this road due to any reasons (presence of trees or levels issues) 	<ul style="list-style-type: none"> Noted Hughes Avenue interface has been updated to reflect road requirements as per Parramatta DCP 2021 Tree allocation and planting design to be confirmed and coordinated by the City of Parramatta Council. The driveway is 9m from the lot boundary and therefore has minimal effects to the adjacent residential dwelling to the north.

Ref	Summary of Submission	Response
	<ul style="list-style-type: none"> The driveway entry and crossover to the building must be coordinated with the public domain and be built to Council Standards. 	
81. Public Domain along Hope Street	<ul style="list-style-type: none"> The public domain along Hope Street must be built in conjunction with PLR 2 works and Council direction for the entire length of the development including the open space being dedicated to Council. In circumstances where the PLR project is delayed, or the current development is built first, the applicant should construct the public domain for the entire length of the property boundary (including the park) to current kerb line of Hope Street to Council's satisfaction. This will include, but not be limited to, paving to specified width, street trees, possible tree grates, strata vaults, street furniture and 	<ul style="list-style-type: none"> Noted. Plans adopt the dimensions provided in the section circulated by TfNSW for the PLR 2 on 26 June 2025. Utilising Council's logic and following the same approach for Melrose Park Town Centre, a footpath of 4m wide has been included in the interim landscape area south of the project site.
Public Open Space		
82. Communal Open Space Courtyard	<p>Communal Open Space Courtyard</p> <ul style="list-style-type: none"> All courtyards and communal spaces within the building must be accessible from ground level and be at grade with the public domain from most sides. Current design of the courtyard / communal space shows the courtyard to be too high from the public domain and accessible by many flights of stairs. This is not a good outcome for the building... Please ensure the courtyards are lowered, stepped to suit the ground plane if necessary. 	<ul style="list-style-type: none"> The height of the podium-level Communal Open Spaces has been designed with consideration to the minimum loading dock height. These spaces cannot be reduced in height, nor be stepped, as doing so would disrupt the minimum height clearances needed above the driveway entrance on the northern side of Lower Ground Level. Maintaining an elevated Communal Open Space with separation from the public domain creates a more comfortable, secure and high-quality environment where residents can gather without feeling exposed to the public parklands. This contributes to the usability of the space, encouraging passive recreation and supported CPTED principles by ensuring spaces feel safe, semi-private and well-overlooked by residents rather than the public. Opportunities for residents who seek a more public interface remain available as the western parklands and green link are directly accessible from the multiple facades. The design

Ref	Summary of Submission	Response
		<p>therefore supports both private residential amenity and community integration without compromising safety or privacy.</p> <ul style="list-style-type: none"> All courtyard and communal areas are accessible as confirmed by the Access Report submitted with the original EIS. An excerpt is provided below from the Access Report: <p><i>Compliance: The design as proposed satisfies the requirements of NCC Performance Requirement D1P1(a), NCC Clause D4D2 and NCC Clause D4D3(i). The provisions of NCC Clause D4D3(1) will need to be satisfied. NCC Clause D4D3(1) states: An accessway must be provided to a building required to be accessible</i></p> <ul style="list-style-type: none"> <i>(i) from the main points of a pedestrian entry at the allotment boundary; and</i> <i>(ii) from another accessible building connected by a pedestrian link; and</i> <i>(iii) from any required accessible carparking space on the allotment.</i>
83. Communal Open Space Courtyard	<ul style="list-style-type: none"> The communal open space / courtyard must be designed to be on level with the through site link and be accessible from the through site link to enable contiguous deep soil and provision of large trees, which will provide better pedestrian and resident facilities at ground as well as passive surveillance of the east-west through site link. 	<ul style="list-style-type: none"> The height differentiation between the public and private domains has been intentionally incorporated to define the character and function of each space. This separation enhances safety and privacy, which allows residents to use the communal open space without being overlooked by pedestrians along the through-site link. While the communal open space is not the same level as the public domain, the design ensures visual connectivity for passive surveillance, from the stairs and ramp access, terrace homes and activation near the driveway entrance, maintaining a secure environment that respects the amenity of residents and pedestrians.
84. Communal Open Space Courtyard	<ul style="list-style-type: none"> Ensure the communal open space is provided as a common facility for all users, irrespective of their economic status and should not be segregated 	<ul style="list-style-type: none"> Communal open space is not segregated due to the separate stratum lots, which are required for the affordable housing and co-living components due to the different providers managing the site.

Ref	Summary of Submission	Response
		<ul style="list-style-type: none"> Residents from either the affordable housing or co-living components of the development can utilise the Western Parklands or the local eastern park for external interaction. The pub tenancy provides an opportunity for further interaction between residents and the public.
Universal Access		
85	<ul style="list-style-type: none"> All building entrances must have DDA-compliant equitable access. Platform lifts are not supported as wheelchair entry points to any buildings 	<ul style="list-style-type: none"> All entry sides of the proposal are accessible and have been reviewed and endorsed by the external Access Consultant. Please refer to the original EIS and associated Access Report.
Contamination		
86	<ul style="list-style-type: none"> Council recommends that, before remediation works commence or any Construction Certificate is issued, a revised RAP addressing all data gaps be submitted and endorsed by an independent NSW EPA-accredited site auditor. Upon completion, a validation report must be provided to confirm compliance with revised RAP, remediation criteria, and relevant policies. As per the recommendations of submitted reports, a Hazardous Material Survey must be completed by suitably qualified consultant. Preparation of an Asbestos Management Plan for the management of ACM building materials and asbestos-contaminated fill soil is required. 	<ul style="list-style-type: none"> The RAP has addressed these issues and the data gap report submitted with the original EIS. A Detailed Site Investigation (DSI), Data Gap Investigation (DGI) and Remediation Action Plan (RAP) were prepared and submitted with the original application (refer to EIS' Appendix 19, 19a and 20 respectively). The RAP prepared by EI Australia and originally submitted with the application addresses these matters. In particular, the RAP provides a staged approach to the remediation of the site. These stages are as follows: <ul style="list-style-type: none"> Stage 1 - Preliminaries and site establishment Stage 2 - Pre and post-demolition inspections Stage 3 - Data Gap Closure <ul style="list-style-type: none"> Investigation of building footprint structures following demolition within Lot B/DP356298 Lateral extent of asbestos-impacted soils at TP7 Stage 4 - Remedial excavations of hotspots, bulk excavation and waste classification; and Stage 5 - Preparation of a Site Validation Report.

Ref	Summary of Submission	Response
Heritage		
87	<ul style="list-style-type: none"> Conditions should include implementation of mitigation measures, noting the site is unlikely to contain Aboriginal objects and that future planning should incorporate the Connecting with Country principles and stakeholder coordination 	<ul style="list-style-type: none"> A Connecting with Country Report (EIS' Appendix 8) and Aboriginal Heritage Impact Assessment (7) were prepared by Artefact and submitted with the original application. These stated that: <ul style="list-style-type: none"> <i>A search of the Aboriginal Heritage Information Management System (AHIMS) was completed on 9 May 2025 for a search area measuring approximately 4km x 4km surrounding the study area.</i> <i>A total of 19 registered Aboriginal sites were identified within the search area. There are no registered Aboriginal sites within the study area.</i> The design team completed a Walk on Country consultation on 16 December 2024. Ongoing design consultation with Indigenous stakeholders has continued, with all heritage-related matters to be confirmed in collaboration with Artefact, the appointed Aboriginal Heritage Consultant, to ensure that appropriate processes are in place that recognise, protect and respect Aboriginal cultural heritage.
Crime Prevention		
88	<ul style="list-style-type: none"> Council recommends that the proposed trading hours after midnight are initially conducted on a trial basis initially to assess the impact on the amenity of the neighbourhood. The trial review should be a 12-month period. 	<ul style="list-style-type: none"> Noted. The proposal includes a Plan of Management and Acoustic Report relating to the operation of the Pub. The proposed pub utilisation is subject to further licensing application approval. A trial period is therefore not considered necessary.
Planning		
89	<ul style="list-style-type: none"> Given the proposal includes works that are to be dedicated to Council, conditions of consent must be included which require Council to review and sign off of any Construction Certificate drawings which include works in land to be dedicated to Council 	<ul style="list-style-type: none"> The applicant raises no objection to appropriate conditions being imposed relating to Construction Certificates for the dedication of the relevant portion of land to Council. It is requested that the applicant be provided with a copy of this draft condition for review and confirmation prior to it being finalised.

Ref	Summary of Submission	Response
Traffic and Transport		
90	<ul style="list-style-type: none"> The proposed parking arrangements (vehicles, bicycles, servicing) and traffic generation are considered to be acceptable 	<ul style="list-style-type: none"> Noted
Waste Management		
91	<p>Operational</p> <ul style="list-style-type: none"> Council recommends that each floor's waste cupboard be sized to accommodate dedicated recycling bins and FOGO bins, thereby providing tenants with convenient access for the disposal of recyclables and food organics waste and encouraging engagement with the waste stream. Overall, the proposal demonstrates satisfactory provision for waste services throughout the complex. 	<ul style="list-style-type: none"> Noted
92	<p>Construction</p> <ul style="list-style-type: none"> Construction and Demolition waste management Plan not provided 	<ul style="list-style-type: none"> The applicant raises no objection to an appropriate condition requiring a construction and demolition waste management plan to be provided prior to issuing of the first construction certificate.
Acoustic and Vibration		
93	<ul style="list-style-type: none"> An acoustic review should be undertaken after the selection of the Mechanical plant (recommended at CC Stage) A full construction noise and vibration management plan is recommended to be prepared at the CC Stage 	<ul style="list-style-type: none"> Noted and to be prepared at construction certificate stage.

4.3 Agency Submissions

Ref	Summary of Submission	Response
NSW State Emergency Services Comments		
1	<i>In summary, we recommend:</i>	Lyall & Associates have provided a detailed response to the comments provided by the NSW SES (Appendix 10). This is provided below for ease of reference.
2	<ul style="list-style-type: none"> <i>Further modelling is undertaken including the velocity and hydraulic hazard of flooding on the site itself as well as surrounding streets, the duration of inundation and time to overtopping of roads for events up to and including the PMF as these have not been adequately assessed in the Flood Impact and Risk Assessment.</i> 	<p>The Flood Impact and Risk Assessment (FIRA) that has been prepared for the project involved the use of a detailed two-dimensional (in plan) hydraulic TUFLOW model that has been developed for assessing the nature of flooding within the vicinity of the Melrose Park Urban Renewal Precinct (MPURP) and the impact that future development within its boundaries would have on flood behaviour (MPURP TUFLOW Model).</p> <p>It is noted that City of Parramatta Council (Council) has agreed to the MPURP TUFLOW Model being used as the basis for assessing flooding related issues associated the MPURP given the flood models that have been developed as part of the Parramatta River Flood Study (Stantec, 2024) were not available at the time planning for the redevelopment of the precinct first commenced. It is further noted that Council has not mentioned the need for the Applicant to use an alternative set of flood models in its submission to the SSDA.</p> <p>The MPURP TUFLOW Model has been used to define the nature of flooding in the vicinity of the project for design storms with Annual Exceedance Probabilities (AEPs) of between 50% and 1%, as well as the Probable Maximum Flood (PMF).</p>
3	<ul style="list-style-type: none"> <i>Considering results from the Parramatta River Flood Study 2024 as part of the flood assessment for the site. This study was adopted by council in 2024 and shows greater flood affectation on the site and surrounding streets than the provided Flood Impact and Risk Assessment.</i> 	The MPURP TUFLOW Model is considered to more accurately define the nature of flooding in the vicinity of the project when compared to the two-dimensional (in plan) TUFLOW model that was developed as part of Stantec, 2024 (Stantec TUFLOW Model) for the following reasons:

Ref	Summary of Submission	Response
		<p>a). The MPURP TUFLOW Model incorporates detailed ground survey of the MPURP and its immediate surrounds which has been used to update the less accurate LIDAR survey data, whereas the Stantec TUFLOW Model only incorporates the latter in this area.</p> <p>b) The MPURP TUFLOW Model incorporates a 1 m grid, as opposed to a 2 m grid in the Stantec TUFLOW Model, noting that this approach better represents the conveyance capacity within the surrounding road network.</p> <p>c) The MPURP TUFLOW Model includes stormwater pipes that are less than 600 mm in diameter, a feature which was not incorporated in the Stantec TUFLOW Model and which better represents flooding conditions in the vicinity of the project, especially in relation to frequent storm events.</p> <p>d) The MPURP TUFLOW Model incorporates all of the features which influence flood behaviour in the Melrose Park North portion of the MPURP, noting that this includes the removal of flow discharging to the site from the Western Parklands for all events up to the PMF.</p> <p>It is noted that the MPURP TUFLOW Model shows that under post-MPURP conditions, the site is subject to relatively shallow inundation as a result of stormwater which surcharges the eastern kerblines of Hughes Avenue for storms that are more intense than about 10% AEP. Furthermore, due to the relatively small contributing catchment and steep nature of Hughes Avenue, the duration of overland flow that would be experienced in the adjacent road reserve and through the site would generally be less than 30 minutes for all events up to the PMF.</p>
4	<ul style="list-style-type: none"> Considering the impacts of climate change. It is estimated that the actual probability of a 1 in 100 AEP for the Parramatta River is approximately a 1 in 54 AEP 	<p>The potential impact that future climate change could have on flood behaviour in the vicinity of the project have been assessed in accordance with Council's requirements in the original FIRA.</p>

Ref	Summary of Submission	Response
	<i>event for the current 2025 scenario.4 For the proposed development site, this could result in more frequent inundation and/or isolation than what is currently expected based on previous modelling.</i>	
5	<ul style="list-style-type: none"> <i>Pursuing site design which allows for rising road access from the development to reduce the risk of site users being isolated by flooding.</i> 	As the surrounding road network is subject to relative shallow inundation during intense rainfall events that result in the surcharge of Council's stormwater drainage system, the recommendation to incorporate rising road access into the design is not feasible. As stated above, the duration that overland flow would be experienced in Hughes Avenue is generally less than 30 minutes, which means that occupiers of the proposed development would not be isolated for an unacceptable period of time.
6	<ul style="list-style-type: none"> <i>Pursuing site design and stormwater management that reduces the impact of flooding and minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the community.</i> 	The project is considered to incorporate best practice design in relation to addressing the flooding and stormwater related issues which affect it, note that these have also been developed to be consistent with Council's MPURP specific flood and stormwater related development controls.
7	<ul style="list-style-type: none"> <i>Ensuring that all openings to the basement (ramp, vents, etc) are situated above the Probable Maximum Flood (PMF), or reconsidering basement carparking if this is not feasible to reduce risk to life and property.</i> 	Both finished floor levels and any openings to basement areas have been set at the higher of the following two levels: <ul style="list-style-type: none"> the peak 1% AEP plus 0.5 m freeboard, noting that this assumes 100% blockage of the stormwater drainage system and rainfall intensities increased in accordance with Council's Rainfall Calibration and Climate Change factors; and the PMF.
Ausgrid Comments		
<i>Ausgrid Overhead Powerlines are in the vicinity of the development</i>		
8	<i>The developer should refer to SafeWork NSW Document – Work Near Overhead Powerlines: Code of Practice. This document outlines the minimum separation requirements between electrical mains (overhead wires) and structures within the development site throughout the construction</i>	Noted. During the construction of development, all works will be undertaken in accordance with the <i>SafeWork NSW Document Work Near Overhead Powerlines Code of Practice</i> .

Ref	Summary of Submission	Response
	<i>process. It is a statutory requirement that these distances be maintained throughout the construction phase.</i>	
9	<i>Consideration should be given to the positioning and operating of cranes, scaffolding, and sufficient clearances from all types of vehicles that are expected be entering and leaving the site.</i>	
10	<i>The “as constructed” minimum clearances to the mains must also be maintained. These distances are outlined in the Ausgrid Network Standard, NS220 Overhead Design Manual. This document can be sourced from Ausgrid’s website at www.ausgrid.com.au.</i>	
11	<i>It is the responsibility of the developer to verify and maintain minimum clearances onsite. In the event where minimum safe clearances are not able to be met due to the design of the development, the Ausgrid mains may need to be relocated in this instance. Any Ausgrid asset relocation works will be at the developer’s cost.</i>	
New Driveways – Proximity to Existing Poles		
12	<i>Proposed driveways shall be located to maintain a minimum clearance of 1.5m from the nearest face of the pole to any part of the driveway, including the layback, this is to allow room for future pole replacements. Ausgrid should be further consulted for any deviation to this distance.</i>	Noted, the proponent will consult further with Ausgrid regarding the location of the proposed driveway in relation to existing poles.
New Driveways – Proximity to Existing Poles		
13	<i>The following conditions apply for any activities within the electricity easement:</i>	Noted. The referenced conditions will apply for any activities within the electricity easement and will be complied with during construction and operational phases of the development.
14	<ul style="list-style-type: none"> <i>All construction works on or near the easement and/or powerlines must adhere to the Safework NSW – Work Near Overhead Powerlines: Code of Practice, 2006</i> 	
15	<ul style="list-style-type: none"> <i>Ausgrid is not responsible for the reinstatement of any finished surface within the easement site.</i> 	

Ref	Summary of Submission	Response
16	<ul style="list-style-type: none"> • <i>Ausgrid requires 24-hour access along the easement for plant and personnel. For the purpose of exercising its rights under the easement, Ausgrid may cut fences and/or walls and install gates in them. Where the easements on a site do not provide practical access to all of Ausgrid's infrastructure, a suitable right of access at least 5m wide must be provided to each asset.</i> 	
17	<ul style="list-style-type: none"> • <i>Access driveways shall withstand the weight of a heavy rigid truck when fully laden weighing 30 tonne.</i> 	
18	<ul style="list-style-type: none"> • <i>Access gates, minimum 4.5 metres wide, may be required in all fences crossing the transmission line easement.</i> 	
19	<ul style="list-style-type: none"> • <i>No vehicles, plant or equipment having a height exceeding 4.6 metres are to be brought into the easement site without written approval from Ausgrid.</i> 	
20	<ul style="list-style-type: none"> • <i>Vehicles brought into the easement, with a height less than 4.6m but having an extension capable of extending greater than 4.6m above ground, must not have that extension operated at all whilst within the easement.</i> 	
21	<ul style="list-style-type: none"> • <i>Adequate removable protection must be installed to prevent vehicles inadvertently colliding with the transmission tower. This proposed form of protection must be forwarded to Ausgrid for review and consent.</i> 	
22	<ul style="list-style-type: none"> • <i>All metal work within the easement site including metallic fencing, are to be locally earthed by a qualified electrician via a 50 sq. mm stranded copper, insulated earth wire bonded to a copper-clad earth-stake driven at least 1.6 metres into the ground.</i> 	
23	<ul style="list-style-type: none"> • <i>Metallic fencing is generally not permitted to extend away from the easement site unless an insulating section is installed, at least 3 metres wide. This</i> 	

Ref	Summary of Submission	Response
	<p><i>requirement maybe relaxed upon assessment of a supplied fencing design.</i></p>	
24	<ul style="list-style-type: none"> <i>No buildings/structures or parts thereof constructed may encroach the easement without written approval from Ausgrid.</i> 	
25	<ul style="list-style-type: none"> <i>No obstruction of any type shall be placed within 10 metres of any part of a transmission line structure except where installed to protect transmission structure from vehicle impacts when Ausgrid has approved such structures.</i> 	
26	<ul style="list-style-type: none"> <i>Care must be taken to prevent any damage to underground metalwork which can extend up to 15 metres away from the transmission line structure.</i> 	
27	<ul style="list-style-type: none"> <i>The storage of non-flammable materials is allowable provided access is maintained along the easement and subject to height limitations of 2.5 metres if climbable or 4.6 metres if not climbable. Lifting of materials within the easement area must consider the clearance requirements given in Safework NSW Code of Practice.</i> 	
28	<ul style="list-style-type: none"> <i>The erection of minor structures such as clothes hoists, barbecues, and the like are permitted within the easement site provided they do not exceed a height of 2.5 metres if climbable or 4.6m if not climbable, and the metallic components are earthed. The positioning of such structures should allow a 5m wide vehicular access along the full length of the subject easement area. Ausgrid reserves the right to remove such structures where required for safety, access, and maintenance.</i> 	
29	<ul style="list-style-type: none"> <i>The flying of kites, model aircraft etc. is not permitted within the easement site.</i> 	

Ref	Summary of Submission	Response
30	<ul style="list-style-type: none"> Any change to ground levels must be submitted to Ausgrid for approval. Any change to ground levels must be submitted to Ausgrid for approval. 	
31	<ul style="list-style-type: none"> Trees, shrubs, or plants which have a mature height of greater than 3.0m, or climbable portions greater than 2.5m above ground, are not permitted within the easement. The planting of other vegetation is to ensure Ausgrid's access and maintenance requirements are maintained. 	
32	<ul style="list-style-type: none"> Ausgrid is to be indemnified from all actions, suits, claims and demands of whatsoever nature, which Ausgrid may incur as a result of the encroachment/s. 	
33	<ul style="list-style-type: none"> Ausgrid reserves the right, by written notice, to require the owner of the property, at the owner's expense, to implement further safety measures, removal or modification of any encroachments not specifically approved by Ausgrid should this be necessary in the future for the safe and continued operation or upgrade of the network asset. 	
New or modified connection		
	<ul style="list-style-type: none"> To apply to connect or modify a connection for residential or commercial premises. Ausgrid recommends the proponent to engage an Accredited Service Provider and submit a connection application to Ausgrid as soon as practicable. Visit the Ausgrid website for further details; https://www.ausgrid.com.au/Connections/Get-connected Additional information can be found in the Ausgrid Quick Reference Guide for Safety Clearances "Working Near Ausgrid Assets - Clearances". This document can be found by visiting the following Ausgrid website: www.ausgrid.com.au/Your-safety/Working-Safe/Clearance-enquiries 	<ul style="list-style-type: none"> The proponent has engaged with an Accredited Service Provider and submit a connection application to Ausgrid as soon as practicable. Endeavour Energy is the local provider.

Ref	Summary of Submission	Response
Transport for NSW Comments		
<i>Protection of TfNSW Infrastructure and Parramatta Light Rail Operation</i>		
34	<i>There are concerns about the potential effect on the structural integrity and safe operation of the light rail during construction and operation phases of the development. The proposed development is located within 25m of the light rail corridor. Clause 2.99 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (T&ISEPP) outlines that in this circumstance development would require concurrence from TfNSW.</i>	Noted. The applicant will adhere to conditions of consent recommended by TfNSW to safeguard the structural integrity and operation phases
35	<i>At this stage there is no certainty on the timing of construction for either the Parramatta Light Rail (stage 2) (PLR2) or the development. Should the PLR2 project construction or operation coincide with the timing of the subject development, there would be potential impacts to both projects. In order to protect both the interests of the development and future construction and operation of the PLR2, the light rail infrastructure must be protected and any disruptions to its operation are to be minimised during the construction and operation of the subject development.</i>	Noted. Appropriate conditions of consent may be imposed to ensure the protection of light rail infrastructure.
36	<i>Recommendation The applicant must be conditioned to:</i> <ul style="list-style-type: none"> • <i>Provide all relevant documentation as requested by TfNSW for review and endorsement prior to issuing the relevant Construction Certificate; and</i> • <i>Protect TfNSW infrastructure and to minimise disruption to the light rail operation during the construction and operation of the subject development.</i> 	Noted. These recommendations will be adhered to and relevant conditions can be imposed.
Traffic Impact Assessment		
37	<i>The traffic generation for the residential component has been estimated using rates in the now superseded Guide to Traffic Generating Developments (GTGD, RTA, 2002) and associated Traffic Surveys (RMS, 2013). It should be noted that the traffic generation rates should be based on those</i>	<ul style="list-style-type: none"> • As identified by Council, the amended traffic generation rates do not result in a material difference to the outcome of the traffic impact assessment.

Ref	Summary of Submission	Response
	outlined in the Guide to Transport Impact Assessment (GTIA), which formally superseded the GTGD in 2024.	<ul style="list-style-type: none"> Accordingly, no amendments to the Traffic Impact Assessment have been undertaken.
38	<p><i>Recommendation</i></p> <p><i>It is acknowledged that the use of the outdated GTGD does not result in a material difference to the outcome of the traffic impact assessment.</i></p>	See above.
Draft Conditions of Consent		
39	<p><i>It is advised that the final suggested Conditions of Consent (As listed in TfNSW's submission) be provided as part of the comments on the applicant's response to submissions.</i></p>	<p>The recommended conditions of consent prepared by TfNSW have been reviewed and the following changes are requested:</p> <ul style="list-style-type: none"> The conditions generally relate to the interaction of the proposed development and the PLR 2. However, they do not factor in timing. It is anticipated that the construction of Melrose Park Gateway will be completed prior to the commencement of construction of the PLR 2. On this basis, it is requested that the conditions be amended to clearly specify: <ul style="list-style-type: none"> What conditions apply where construction of the Melrose Park Gateway has been completed prior to the commencement of works for the PLR 2; or What conditions apply where the PLR2 has commenced construction prior to the commencement/ completion of works for the Melrose Park Gateway. Two conditions are proposed which require the applicant to hold <i>current public liability insurance cover of minimum AUD\$ 250 million, unless otherwise advised by TfNSW, for the entire period of the work programme</i>. This figure is excessive and is a financial constraint. As above, this condition should not apply where the Melrose Park Gateway is completed prior to the commencement of works for the PLR 2. Further, where the PLR 2 has commenced construction prior to the commencement/ completion of the Melrose Park Gateway, we request that this figure be reduced to \$50.

Ref	Summary of Submission	Response
DCCEEW CPHR		
40	<p><i>FIRA does not include the required information below:</i></p> <p><i>Recommended Action</i></p> <p><i>Update FIRA to include:</i></p> <ul style="list-style-type: none"> • <i>hazard mapping for the Probable Maximum Flood (PMF)</i> • <i>discussion of hazard conditions in the PMF</i> • <i>confirmation that all potential floodwater ingress points to the basement, including any vents will be protected from the PMF, and</i> • <i>a table comparing all relevant floor levels (including the driveway crest) to flood planning levels and PMF levels.</i> 	<ul style="list-style-type: none"> • Lyall & Associates have provided a response to the recommended actions from the Conservation Programs, Heritage and Regulation (CPHR) group of DCCEEW (refer to Appendix 10b) • Figure 1 in this response illustrates the indicative extent and depth of inundation, while Figure 2 shows the flood hazard vulnerability classification of the Major Overland Flow associated with a Probable Maximum Flood (PMF) event. • In particular, the response notes that all habitable floor levels and ingress points to the basement have been set at or above the Flood Planning Level or the PMF level, whichever is higher.
41	<p><i>Co-ordination of post-development flood modelling</i></p> <p><i>The proposed development would include minor impact on PMF levels in order of 0.1-0.2m. the post development flood levels should be considered in setting design levels for relevant neighbouring buildings to the south, for example, if any basements need protection from the PMF.</i></p> <p><i>Recommendation action:</i></p> <p><i>The consent authority should ensure that the design of buildings across the Melrose Park Precinct is coordinated and responds to all relevant flood modelling. Accordingly, the consent authority may consider requiring applicants in the Melrose Park Precinct to produce flood model results for an ultimate developed state (as well as any interim developed conditions accounting for all future development</i></p>	<ul style="list-style-type: none"> • Appendix 10b, includes a comparison of the proposed finished floor/basement crest levels with associated minimum freeboard levels. • The proposed finished level is higher than the Flood Planning Level (1%AEP +500mm) or the PMF level.

Ref	Summary of Submission	Response
DCCEEW Water		
42	<p>1.1 Recommendation - post determination <i>The Department of Planning, Housing and Infrastructure (DPHI) should request the proponent to obtain a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2025.</i></p> <p>Explanation <i>The Groundwater Seepage Analysis (Appendix 38) is considered reliable and suitable for a project of this scale and risk. The analysis predicted water take due to groundwater inflows of 1.2ML/yr for construction and for the ongoing drained basement during operation of the project. Under the Water Management Act 2000, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under the Water Management (General) Regulation 2025 applies. An exemption may be available for water take during construction activities in coastal water sources under Clause 6 of Schedule 4 of the WM Reg, or where the groundwater take during construction or operation is less than or equal to 3M L per water year (cl 19, sch 4 of WM Reg). To claim either of these exemptions certain requirements must be met, such as the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and</i></p>	<ul style="list-style-type: none"> • Noted

Ref	Summary of Submission	Response
	<p><i>the records are kept for 5 years. Further information on these requirements and other information on licensing and approvals and exemptions, including a form to report and record water taken can be found at: https://water.dpie.nsw.gov.au/licensing-and-trade and Groundwater access licence exemptions NSW Government Water.</i></p>	
NSW Fire & Rescue		
43	<p><i>Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 18 September 2025, requesting advice on the EIS for MELROSE PARK GATEWAY - 19 HOPE STREET, MELROSE PARK (SSD 84348959).</i></p> <p><i>FRNSW have reviewed the EIS. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.</i></p>	<ul style="list-style-type: none"> • Noted
Sydney Water		
44	<p>Water Servicing</p> <ul style="list-style-type: none"> • <i>Our preliminary assessment indicates that water servicing should be available for the proposed development.</i> • <i>Servicing of the proposed development is however dependent on the delivery of amplifications being constructed by developer under Sydney Water case CN212182.</i> • <i>Other amplifications, adjustments, deviations and/or minor extensions may be required.</i> • <i>Detailed requirements will be provided at the Section 73 application stage.</i> 	<ul style="list-style-type: none"> • Noted

Ref	Summary of Submission	Response
45	<p>Wastewater Servicing</p> <ul style="list-style-type: none"> <i>The development site is located within the Northern Suburbs Ocean Outflow Sewer (NSOOS) SECT 7-13 catchment.</i> <i>Sydney Water is currently undertaking a study to determine future infrastructure needs in this catchment, with completion anticipated by April 2026. Servicing requirements for the development will be dependent on the outcomes of the study.</i> <i>Detailed requirements will be provided at the Section 73 application stage.</i> 	<ul style="list-style-type: none"> Noted
46	<p><i>Sydney Water supports government-backed growth initiatives within our area of operations, striving to provide timely and cost-effective water and wastewater infrastructure without undue impacts. To offer robust servicing advice and investigate staged servicing possibilities, we require the proponent to provide anticipated ultimate and annual growth data for this development as outlined in the enclosed Growth Data Form.</i></p>	<ul style="list-style-type: none"> Noted
47	<p><i>Next steps</i></p> <ul style="list-style-type: none"> <i>Should the Department of Planning, Housing and Infrastructure (the Department) decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent.</i> <ul style="list-style-type: none"> <i>Section 73 Compliance Certificate</i> <i>Building Plan Approval</i> <p><i>Further details of the conditions can be found in Attachment 1.</i></p> <ul style="list-style-type: none"> <i>Given the scale and complexity of the proposed development, further investigations will be required to determine the servicing requirements for this site. It is</i> 	<ul style="list-style-type: none"> Noted

Ref	Summary of Submission	Response
	<p><i>recommended that a Water Servicing Coordinator is engaged as soon as possible, and an Anticipated Section 73 application is submitted with Sydney Water. Anticipated Section 73 applications can be registered with Sydney Water once a development application has been lodged with the relevant consent authority.</i></p> <ul style="list-style-type: none"> <i>The proponent should complete and return the enclosed Growth Data Form as part of their Anticipated Section 73 application. The Growth Data Form should be updated promptly with Sydney Water in case of changes.</i> <i>The Department is advised to forward the enclosed Sydney Water Development Application Information Sheet (for proponent) to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions.</i> 	
Heritage NSW		
	<p><i>Heritage NSW notes that the nearest item to the proposed SSD site listed in the State Heritage Register is the Newington Armament Depot and Nature Reserve (SHR no. 01850), and that the SoHI assesses that the proposed works will have a minor visual impact to the item. No areas of historical archaeological potential were identified in the SoHI.</i></p> <p><i>Heritage NSW has no further comment on the proposal at this time.</i></p> <p><i>As the site is in the vicinity of local heritage items, advice should be sought from the relevant local council.</i></p>	<ul style="list-style-type: none"> <i>Noted</i>

4.4 Public Submissions

Issue	Response	Reference
The project		
<p>Built Form</p> <ul style="list-style-type: none"> Inconsistent with the existing and emerging character of Melrose Park and Ermington 	<p>The proposed development achieves a high-quality built form and urban design outcome that is consistent with the desired future character of the Melrose Park precinct and gradual densification of the locality, as outlined in the accompanying Design Report.</p> <p>The Design Report as submitted with the original EIS further outlines how the design responds to the site's topography and surrounding context, supporting the gentrification of the area and creating a strong urban presence while maintaining a human scale at street level along Hope Street and Hughes Avenue.</p> <p>The proposed development will provide an appropriate built form that leverages the strategic merit of the site, delivering co-living and affordable homes that align with the objectives and vision of the applicable strategic planning framework and the principles of the Housing SEPP, to increase housing density within highly accessible areas.</p>	<ul style="list-style-type: none"> Appendix 4 – Architectural Plans Design Report submitted with EIS (Appendix 6) Visual Impact Assessment submitted with EIS (Appendix 14)
<p>Height</p> <ul style="list-style-type: none"> Increase of height from 48m to 64m is too large Inconsistent with LEP objectives Clause 4.3(1)(b) & (d) Planning agreement should accompany the substantial rezoning uplift 	<p>The proposed increase in building height from 48m to 64m provides for appropriate and strategic uplift in the context of the evolving Melrose Park precinct. This change responds to the site's prominent corner location and supports the broader urban renewal objectives of the area. The increased height allows the development to better integrate with planned higher density-built form to the east, where the future Melrose Park Town Centre is currently under construction.</p> <p>The Parramatta DCP 2023 building height diagram identifies that secondary towers located across comparable sites are typically within the 8-10 storey range. The proposed building height therefore reflects the planned urban structure and is consistent with the anticipated hierarchy of built form within the precinct. On this basis, the proposal is considered to be consistent with objectives (1)(b) and (d) of Clause 4.3 of the PLEP 2023.</p>	<ul style="list-style-type: none"> Appendix 4 – Architectural Plans Appendix 9 – Planning Agreement Advice

Issue	Response	Reference
	<p>The western portion of the site has been allocated to the smaller co-living building, resulting in a shorter built form, ensuring the lowest scale within the development is positioned to adjoin existing low-density dwellings along Hughes Avenue. To further mitigate bulk and scale, a two-storey podium has been incorporated along Hughes Avenue, creating a more appropriate transition by aligning with the 1-2 storey streetscape of Hughes Avenue.</p> <p>The Planning Agreement as entered into under PP-2023-1736 remains relevant to the proposed development, as confirmed by Addisons (refer to Appendix 9).</p>	
<p>FSR</p> <ul style="list-style-type: none"> Increase from 2.67:1 to 3.75:1 is a significant intensification 	<p>The proposed increase in FSR from 2.67 to 3.75:1 responds to the site's strategic location within the evolving Melrose Park precinct. The uplift supports the delivery of a more efficient and activated built form that aligns with the intended high density mixed-use precinct.</p> <p>The FSR is consistent with the vision for Melrose Park and aligns with the emerging built form of the approved and under construction Town Centre to the east. The site capitalises on the opportunity to accommodate additional diverse housing and commercial uses in a well-serviced and accessible location. It enables the site to realise its full development potential and contributes to the vibrancy of the precinct.</p> <p>The additional FSR aligns the proposal with the emerging Town Centre and creates a higher density mixed use corridor along the future light rail line.</p>	<ul style="list-style-type: none"> Appendix 4 – Architectural Plans
<p>Non-residential FSR</p> <ul style="list-style-type: none"> The minimum 1,400m² of non-residential floor space should be retained 	<p>Whilst the proposal seeks a reduction to the required non-residential gross floor area (GFA), it is considered minor in nature as it is proposed to reduce this from 1,400m² to 1,100m².</p> <p>The reduction in non-residential GFA is appropriate with consideration of:</p> <ul style="list-style-type: none"> The provision of 68% of the total GFA as affordable housing. The site's strategic proximity to the Melrose Park Town Centre, which will provide over 30,000m² of non-residential GFA to adequately service future residents. 	<ul style="list-style-type: none"> Appendix 6 – Retail and Commercial Land Use Assessment

Issue	Response	Reference
	<ul style="list-style-type: none"> The Retail and Commercial Land Use Assessment prepared by Atlas Economics supports this reduction, noting the intended provision of non-residential uses within the Melrose Park Precinct exceeds industry standards requiring 2.2m² of retail floorspace demand for every resident across Australia. <p>Furthermore, two SSDs currently under assessment for Melrose Park South will deliver around 1,000m² of new retail and commercial space. Together, these developments ensure the precinct is well supplied with employment and commercial offerings. In this context, the reduced non-residential GFA avoids duplicating future services, delivers a more consolidated corner-site outcome, and reinforces the Town Centre as the precinct's primary commercial hub.</p>	
<p>Affordable Housing</p> <ul style="list-style-type: none"> Should be provided in perpetuity 	<p>Evolve Housing have specified the required apartment mix to serve the demographic with a demonstrable need for affordable housing within the CS04 Northern suburbs zone for social housing. It is noted that Evolve Housing are also supportive of the agreement to manage the affordable housing for a 25 year period in accordance with the Housing Australia Future Fund Facility agreement.</p>	<ul style="list-style-type: none"> Appendix 8 – Evolve Housing Letter
Procedural matters		
<p>Inconsistency with Strategic Vision</p> <ul style="list-style-type: none"> The proposed rezoning is inconsistent with Council's vision for development in the <i>Melrose Park Urban Renewal Precinct</i> Approval of this development would undermine Council's vision for the precinct Dwelling creep over the maximum number of dwellings that can be 	<p>The proposed development aligns with key State government and Council strategic plans, including the Greater Sydney Region Plan, Central City District Plan, Parramatta Local Strategic Planning Statement, Housing 2041 and National Housing Accord 2022.</p> <p>The proposal addresses housing shortfalls through a well-located, diverse range of dwellings and by delivering social infrastructure within the Melrose Park precinct, supporting Council's vision to create accessible, sustainable neighbourhoods.</p> <p>All supporting technical information as submitted with the original EIS, and as amended to support this RtS, demonstrate that the site and surrounds can appropriately accommodate the increase in population as proposed.</p>	<ul style="list-style-type: none"> Environmental Impact Statement Concurrent Rezoning Report

Issue	Response	Reference
<p>accommodated in the precinct</p>		
<p>Economic, environmental and social Impacts of the project</p>		
<p>Traffic</p> <ul style="list-style-type: none"> • There are existing traffic issues on Hughes Avenue, hotel and further homes are not suitable • Likelihood of traffic issues at school pickup times • Increased strain on public transport • 155 parking spaces for 197 affordable homes, 154 co-living units and a licensed hotel is insufficient • Need for street parking will overflow into surrounding streets • Reduced pedestrian safety and walkability • Claims in the TIA that construction is not forecast to cause significant disruptions is not based on day-to-day experience • A CTMP should be prepared that accounts for surrounding construction works 	<p>A Transport Impact Assessment (TIA) was submitted with the original SSDA package.</p> <p>The site benefits from its proximity to the Victoria Road Transport Corridor, the future Parramatta Light Rail along Hope Street and existing bus services in the area. Located adjacent to the planned Melrose Park Light Rail station, future residents and workers will have convenient access to a range of transport options, providing strong connectivity to and from the Parramatta CBD.</p> <p>The TIA has confirmed the development complies with the parking rates set out under the Housing SEPP for both affordable housing and co-living uses.</p> <p>A CTMP has been prepared and is included as part of the TIA and accounts for surrounding construction works. The CTMP ensures effective safety measures will be installed to minimise impacts to pedestrian safety and walkability during construction. In addition, the landscaped areas increase walkability through proposed through site links, both east-west and north-south.</p> <p>The TIA confirms that the development is not expected to cause significant disruptions, noting that this assessment is based on forecast modelling rather than day-to-day observations.</p>	<ul style="list-style-type: none"> • Transport Impact Assessment submitted with the EIS (Appendix 15)
<p>Noise</p> <ul style="list-style-type: none"> • Likely noise impacts late at night as a result of the hotel. 	<p>A Noise and Vibration Impact Assessment (NVIA) has been submitted with the original SSDA package.</p> <p>The NVIA ensures that any noise impacts from the proposed pub will be appropriately managed through the implementation of acoustic mitigation</p>	<ul style="list-style-type: none"> • Noise and Vibration Impact Assessment submitted with the EIS (Appendix 16)

Issue	Response	Reference
<ul style="list-style-type: none"> Current construction noise is excessive and has no regard for noise restrictions 	<p>measures, including enhanced façade glazing and acoustic seals, closed-window ventilation and operational noise controls.</p> <p>Furthermore, noise from the pub will be managed through the implementation of a Plan of Management (PoM). The PoM includes strategies to manage patron behaviour and noise and is designed to ensure the pub operates responsibly, with minimal impact on residential and commercial amenity, and in compliance with relevant planning and liquor regulations.</p> <p>While the construction works will generate noise levels that at times exceed noise thresholds, these impacts are intermittent and primarily associated with early stage works such as jackhammering and piling. Construction will be managed in accordance with the interim construction noise guidelines (2009) and standard EPA procedures. Construction noise mitigation measures will be implemented during the construction phase.</p>	<ul style="list-style-type: none"> Hotel (Pub) Premises Plan of Management submitted with the EIS (Appendix 41)
<p>Licensed Hotel</p> <ul style="list-style-type: none"> A licensed hotel is unsuitable for the location due to proximity to schools and parks. Impacts on existing residents Likelihood of antisocial behaviour Inclusion of co-living units and a hotel may introduce transient populations Hours of operation are extreme for a local community Inclusion of gaming machines will limit project's public benefit – other land uses may be more suitable for an 	<p>The pub will provide for a meeting place for both future residents of the concurrent SSD development and the broader Melrose Park precinct, encouraging socialisation for a growing community. It will continue to meet the objectives of the MU1 zone by providing a mixed-use development where residents benefit from co-location with non-residential uses.</p> <p>The inclusion of the children's play area and multiple distinct seating zones ensures the venue caters to a diverse demographic, including families, young professionals and older residents.</p> <p>The PoM outlines strict protocols to ensure the pub operates without adversely affecting surrounding areas. These measures are to manage the noise emissions, restricting operating hours for outdoor spaces and ensure safe and orderly patron behaviour.</p> <p>The inclusion of affordable housing, co-living units and a pub diversifies the residential and non-residential offerings within the locality.</p>	<ul style="list-style-type: none"> Hotel (Pub) Premises Plan of Management submitted with the EIS (Appendix 41)

Issue	Response	Reference
<p>upcoming town centre (library, café)</p>	<p>Co-living units may better serve tertiary education students noting Macquarie University is located approximately 8km from the subject site and approximately 3km from Meadowbank TAFE. The pub will service both immediate residents and visitors, noting it is appropriately located in proximity to the future light rail station to ensure safe travel to and from the site for pub visitors.</p> <p>The pub's operation hours are consistent with similar types of venues within the Parramatta LGA. The PoM will ensure any impacts arising from its operation are appropriately managed and minimised.</p> <p>As stated within the PoM, all licensees, managers and staff will be formally trained in the PoM procedures as well as in Responsible Conduct of Gaming to limit any negative impacts of the inclusion of the gaming machines.</p>	
<p>Overshadowing</p> <ul style="list-style-type: none"> Less natural light in surrounding area impacting plant life on surrounding streets and properties 	<p>Updated shadow diagrams confirm there are minimal shadowing impacts on surrounding streets and properties. The stepping of building heights on the western side of the site minimises the overshadowing effects on the low density residential, with the bulk of shadowing confined to the early morning and late afternoon periods.</p>	<ul style="list-style-type: none"> Appendix 4 – Architectural Plans
<p>Character of the area</p> <ul style="list-style-type: none"> Proposal does not align with the family-oriented area 	<p>The proposed development achieves a high-quality built form and urban design outcome that is consistent with the desired future character of the Melrose Park precinct and gradual densification of the locality. It will provide diverse housing options and social infrastructure, while transitioning the precinct towards a more urban, mixed-use environment.</p>	<p>-</p>
<p>Amenity</p> <ul style="list-style-type: none"> The area lacks open spaces to support this overdevelopment Landscaping is limited to the area beneath a powerline, concerns regarding radiation exposure 	<p>The proposal will provide significant open space embellishments, including dedicated RE1 public recreation land (approx. 2,561m²) to deliver a public park.</p> <p>The park is to be appropriately landscaped to increase amenity for users and will also include pedestrian links, public seating and an open lawn area.</p>	<ul style="list-style-type: none"> Appendix 4 – Architectural Plans Appendix 5 – Landscape Plans

Issue	Response	Reference
	The location of the park has been endorsed by Council and is an integral part of the Melrose Park master plan. The facilitation of the park ensures the adequate provision of open space for the future population.	
Construction <ul style="list-style-type: none"> Noise, traffic and dust throughout construction will cause disruptions. 	Construction impacts, including noise, traffic and dust generated during construction, will be appropriately managed through the CTMP and relevant conditions of consent.	<ul style="list-style-type: none"> Transport Impact Assessment submitted with the EIS (Appendix 15)
Air Quality <ul style="list-style-type: none"> A dedicated Air Quality Impact Assessment should be prepared 	Noted, the proposed land use is not anticipated to have a negative impact on air quality.	-
Climate <ul style="list-style-type: none"> Increased urban heat island effect post construction 	A Sustainability Report has been submitted with the original SSDA package. The Report confirms the proposal will aim to mitigate potential urban heat island effects on the site and its surroundings through incorporating strategies like green infrastructure, light-coloured materials, permeable pavements and sustainable urban planning to create cooler and healthier built environments.	<ul style="list-style-type: none"> Sustainability Report submitted with the EIS (Appendix 34)
Privacy <ul style="list-style-type: none"> Development will cause privacy issues to nearby homes 	The proposed development has been designed to minimise privacy impacts on surrounding homes. Measures such as building setbacks, orientation, screening, and careful placement of windows and balconies ensure that the privacy of neighbouring properties is protected while still achieving high-quality urban design outcomes.	<ul style="list-style-type: none"> Appendix 4 – Architectural Plans
Infrastructure <ul style="list-style-type: none"> Roads, sidewalks, utilities and underground services are not equipped to support development of this magnitude Seemingly no plans to improve road infrastructure, which is already under strain. 	<p>Relevant conditions of consent can be imposed to ensure the protection of Council assets during construction.</p> <p>The TIA submitted with the original EIS demonstrates that the proposal does not result in significant traffic generation and therefore does not warrant any upgrades to road infrastructure. It is also noted that this development will likely be delivered at a similar time to the PLR 2, providing diverse travel options for the future population to reduce strain on the existing surrounding road network.</p>	<ul style="list-style-type: none"> Transport Impact Assessment submitted with the EIS (Appendix 15)
Wind	A Pedestrian Wind Environment Statement has been submitted with the original SSDA package and confirms the proposed development is	<ul style="list-style-type: none"> Pedestrian Wind Environment Statement

Issue	Response	Reference
<ul style="list-style-type: none"> The inconsistent scale of the development risks increasing wind 	<p>expected to be suitable for the intended use through incorporating several design features and wind mitigating strategies.</p>	<p>submitted with the EIS (Appendix 33)</p>
<p>Visual Impact</p> <ul style="list-style-type: none"> The four towers proposed alongside a bulky and unattractive shopping centre with massive buildings above it, will turn into a concrete jungle with a new project 	<p>A Visual Impact Assessment (VIA) has been submitted with the original SSDA package. The VIA concludes the proposal will result in a reasonable visual impact on the locality as the surrounding built form context is characterised by a transition to high-density development towards the centre of Melrose Park, it is of high-quality architectural design and the proposal is consistent with the strategic context of the area.</p>	<ul style="list-style-type: none"> Visual Impact Assessment submitted with the EIS (Appendix 14)
<p>Landscape</p> <ul style="list-style-type: none"> The landscaped area proposed is below the Housing SEPP's development standard for in-fill affordable housing Deep soil zones are significantly lower than the ADG's controls Small setbacks prevent canopy trees being planted in front setback to Hughes Avenue 	<p>The proposed development seeks to increase the deep soil zones and landscaped area on the site.</p> <p>The affordable housing component provides a total of 934m² of functional communal landscaped space across levels 1, 15 and the co-living areas. In addition, a 2,561m² public park is to be accessible to all residents and the wider community. Accordingly, the proposal meets the required 30% minimum landscaped area.</p> <p>The proposed development will provide 1,300m² (15.3%) of the site area as deep soil, exceeding the ADGs minimum requirements of 7%. This calculation excludes the deep soil that will be provided in the light rail corridor.</p> <p>Trees have been set back from the building by a minimum of 3m wherever possible. The landscape plan reflects these setbacks while providing sufficient deep soil to support trees reaching maturity. In areas with limited space, fastigate species will be planted.</p>	<ul style="list-style-type: none"> Appendix 5 – Landscape Plans
<p>Issues beyond the broader scope of the project or not relevant</p>		
<p>Construction impacts of Melrose Park</p> <ul style="list-style-type: none"> There are potholes and surface damage on the roads at the end of Hope St 	<p>A CTMP has been prepared and is included as part of the TIA and accounts for surrounding construction works. The CTMP ensures effective management of traffic, parking, pedestrian safety, noise, waste, and site access to minimise disruption and maintain safety in the area during construction.</p>	<ul style="list-style-type: none"> Transport Impact Assessment submitted with the EIS (Appendix 15)

Issue	Response	Reference
<ul style="list-style-type: none"> • Large construction materials have frequently occupied parking street parking • Construction vehicles often block the road when entering or exiting the site – also impacts pedestrians • Causing excessive waste • Area currently unsafe for children with construction materials • Consistent high levels of noise 		
<p>Integrity of Planning System</p> <ul style="list-style-type: none"> • Allowing significant changes to bypass Council may set a precedent 	<p>The proposed height and FSR is generally commensurate with that achievable under the Housing SEPP bonuses for in-fill affordable housing and is consistent with the surrounding approved and future built form within Melrose Park precinct.</p>	<p>-</p>

5 Updated project justification

This section includes an updated justification and evaluation of the project, incorporating any relevant issues raised in submissions and the response to these issues is provided in Section 4 of this report.

The project team has supplied additional information in line with the submissions received:

- The Architectural Plans (Appendix 4) and Landscape Plans (Appendix 5) have been revised in line with the SDRP Meeting 2 comments. The project team has provided responses to all comments made by the SDRP and provided updates or justification for the proposed built form outcome where necessary.
- The project team has provided a Retail and Commercial Land Use Assessment (RCLUA) that addresses DPHI and Council concerns relating to the reduction in non-residential floorspace. The RCLUA confirms that the proposed reduction in non-residential floor area is justified and does not result in any negative economic impacts.
- The proposal is accompanied by an updated Preliminary Hazard Analysis that addresses DPHI's comments in relation to total population considered and cumulative societal risk.
- The proposed development is accompanied by two letters of advice prepared by Addisons confirming the existing Planning Agreement executed under PP-2023-1736 applies to this development.
- The proposal is accompanied by updated flooding, landscaping and subdivision plans, addressing DPHI and Council comments.

The updated reports have been utilised to address the comments raised by DPHI, Council, Government agencies and members of the public in the above Section 4.

The application remains largely consistent with the justification as provided in the EIS, provided below:

- The site is a key gateway to the Melrose Park Urban Renewal Precinct, within 100m of the Melrose Park Town Centre and light rail station.
- The development will provide 197 affordable housing units and 154 co-living units within close proximity to the Melrose Park town centre and light rail station, delivering well-located homes near transport, amenities and jobs.
- The proposal delivers social infrastructure, which includes:
 - A public park to be dedicated to Council once development of the associated SSDA has been completed, and,
 - A pub, provided at the ground and first floors of the development. The pub will offer a complimentary use to the Melrose Park Town Centre and not take away from the proposed Retail Precinct.
- The significant public benefits include:
 - RE1 dedicated public recreation land (approx. 2,561m²) to provide open space which forms part of the wider Western parklands network, with green links through to Parramatta River and enhancing community access to nature

- Updated landscape plans, including detail on native plantings, improved biodiversity and pedestrian pathways
- Providing a pub that provides for local gathering, dining and recreation. The pub use activates the ground floor of the development and ensures passive surveillance of the streetscape.