

Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2124

Your Ref	SSD-71558711
Our Ref	NCA/6/2024
Contact	Douglas Bennett
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11/08/2025

ATTN: Andy Nixey,

COUNCIL SUBMISSION TO REQUEST FOR ADVICE ON EIS – MIXED-USE PRECINCT WITH IN-FILL AFFORDABLE HOUSING – HUGHES AVENUE, MELROSE PARK SOUTH-WEST

I refer to the above request to provide advice on the proponent's Environmental Impact Statement in relation to the proposed mixed-used precinct at Hughes Avenue, Melrose Park (SSD-71558711). Council has reviewed the supplied documentation and wishes to lodge its formal **OBJECTION** to the proposal on the following grounds:

1. **Flood & Catchment Engineering** – Inaccurate flood modelling and lack of On-Site Detention (OSD) system.
2. **Precinct and Strategic Planning** – Insufficient detail on FSR calculations/clarification on how 'site area' is defined in the proposal. Insufficient affordable housing provided – affordable housing units secured by an existing VPA should be excluded from affordable housing calculations for the purposes of meeting the 15% minimum affordable housing requirement under the SEPP (Housing) 2021 (see s. 15C(2)). Clarification needed on total FSR – figure is interchangeable across documents (3.313:1 proposed in Statutory Compliance Table, 3.198:1 proposed in Clause 4.6 Variation Request).
3. **Universal Access** – Insufficient provision of adaptable units in each building (minimum 15% required under PDCP 2023 by virtue of ADG requirements) and accessible pathways.
4. **Design of Proposed Park (OS4)** – Design of the park contains insufficient details to satisfy Council as future asset owner. Undesirable tree species should be replaced. Park to be design in accordance with Melrose Park Public Domain guidelines and show all approved bioretention basins. VPA requires consultation with Council on park design prior to submission of detailed DA/SSD.

In addition to the above, Council wishes to provide **COMMENT** on the following aspects of the proposed development.

1. **Traffic & Parking Generation** – TIA contains discrepancies and does not differentiate between inbound and outbound trips. Minor errors in car park design to be addressed. Oversupply in visitor parking to be reduced. Modelling of road network to be provided showing impact on intersection performance arising from increase in density.
2. **Biodiversity Impact** – Accompanying BDAR lacks science-based assessment of impacts of the change in solar access to endangered vegetation.

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3. **Urban Design** – Further built form refinements required to achieve desired future character.
4. **Trees and Landscaping** – further consideration of adequate soil volume and landscape design is required.
5. **Public Domain** – Public Domain design must meet public domain guidelines and be consistent with other areas of Melrose Park.
6. **Social & Economic Impact** – Additional non-residential floor space to be considered. Further detail on potential community space to be provided. Additional 3-bedroom units recommended.
7. **Waste** – Council does not support chute systems for recycling. Waste rooms should be provided on each floor for storage of recyclables.
8. **VPA** – construction staging noted in the EIS does not correlate with the staging identified in the relevant VPA.
9. **Contamination** – land designated as public parkland must be remediated to the residential C standard under Schedule B1 of the National Environment Protection (Assessment of Site Contamination) Measure 1999 (amended in 2013). All other private open space must also meet the relevant standards under this Measure.
10. **Bicycle Infrastructure** – provide all bicycle parking facilities on basement level 1 for all three blocks and ensure ramp inclines accord with Austroads Guide to Road Design.

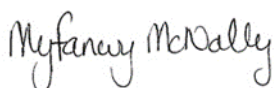
Detailed comments in the form of an appendix to this letter will be issued to the Department at shortly.

Council appreciates the opportunity to comment on the above application, are supportive of the continued investment in new in-fill affordable housing development in the City of Parramatta and look forward to continued collaboration. It is noted that this is the recommendation of Council officers, and this submission has not been endorsed at a Council meeting.

Should additional documentation/information be provided by the proponent that addresses the above key matters to Council's satisfaction, Council will consider formally withdrawing its objection.

Should you wish to discuss the above matters, please contact Douglas Bennett, Development Assessment Officer on the details listed above.

Yours sincerely



Myfanwy McNally

MANAGER, CITY SIGNIFICANT DEVELOPMENT