

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

Your Ref	SSD-84348959
Our Ref	NCA/15/2025
Contact	Alex McDougall
Telephone	9806 5998
Email	amcdougall@cityofparramatta.nsw.gov.au

15/10/2025

ATTN: Paula Bizimis

COUNCIL SUBMISSION TO EXHIBITION OF 'MELROSE PARK GATEWAY' DEVELOPMENT (CORNER OF HOPE STREET AND HUGHES AVENUE, MELROSE PARK)

I refer to the above application and the request to provide advice on the proponent's Environmental Impact Statement.

Council is supportive of affordable housing, however, has some fundamental concerns with the proposal and **objects** on the following grounds.

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

- **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.
- **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.
- **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.
- **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

Contact us:

council@cityofparramatta.nsw.gov.au | 02 9806 5050
@cityofparramatta | PO Box 32, Parramatta, NSW 2124
ABN 49 907 174 773 | cityofparramatta.nsw.gov.au

the lack of an appropriate built form transition from the adjacent low-density development on Hughes Avenue.

- **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.
- **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.
- **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.

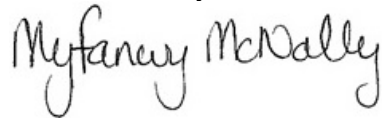
Please find attached at Appendix 1 detailed comments regarding the above objections, as well as other recommendations and requirements.

Conclusion

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 a Council officer submission.

Should you wish to discuss the above matters, please contact Alex McDougall (Team Leader, City Significant Development) on the details listed above.

Yours sincerely



Myfanwy McNally

MANAGER, CITY SIGNIFICANT DEVELOPMENT

APPENDIX 1 – DETAILED OBJECTIONS/COMMENTS

Strategic Land Use Planning

While provision of additional affordable housing is supported, it is noted that there could be a shortfall in infrastructure provision should the SSD application be approved, given the PA deliverables are based on an anticipated dwelling yield of 161 units, as per the finalised Planning Proposal, and development contributions alone will not account for the unforeseen growth over and above this amount.

Council's local infrastructure planning - including Community Infrastructure Strategy (2020) and associated City of Parramatta (Outside CBD) Development Contribution Plan 2021 (Amendment No. 1) - does not account for the extent of residential growth proposed. Therefore, Council officers expect the proponent to undertake a Social Impact Assessment and Infrastructure Needs Assessment, prepared in consultation with Council, to understand the estimated local infrastructure needs (open space, community facilities, affordable housing, etc) arising from the incoming population, which should be used to inform a Letter of Offer to enter into a revised Planning Agreement.

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.

Contributions / Infrastructure

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).

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.

Some wording in the PA is such that it is not clear it would apply to the proposed development given it is inconsistent with the recent planning proposal process. As such this must be reviewed and updated if required.

Further, as outlined above, the proposal may result in further demands on infrastructure (see Strategic Land Use Planning comments above).

As such, a new Planning Agreement is likely required.

The new Planning Agreement must:

- I. Replace and revoke the existing Planning Agreement applying to the site; and
- II. Reflect the increased development yield and associated infrastructure demand arising from the approved development; and
- III. Resolve inconsistencies introduced by the light rail corridor; and
- 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.

If the above recommendation is not supported, then at a minimum, the following condition should be included in the development consent.

Local Planning Agreement

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.*

Design Excellence

Character of Hope Street

- There is a clear contrast between the character of the east/west and north/south streets in Melrose Park. The east/west streets run across the slope of the terrain, so streets have high sides and low sides. The north/south streets run down the slope so the differential in levels is absorbed within the development lots. The street character is then further defined with either C shaped buildings around courtyards facing the street or continuous perimeter block buildings.
- Hope Street runs east/west through the Melrose Park precinct between Melrose Park North and Melrose Park South. It is the 'high street'. Development on the northern side of Hope Street, including the Town Centre has a podium/ street wall of 4-6 storeys with retail on the ground floor. The light rail stop is opposite the Town Centre which also has retail at higher levels. Perimeter block is proposed on the south side with some retail.
- All east/ west streets in Melrose Park have a differential in levels between the high side and the low side. Because Hope Street has the light rail corridor it is the widest street and the differential in levels is greater than in other east/west streets.
- Hope Street therefore is the most urban street in Melrose Park because of the retail uses at the ground floor, the light rail and the width. A strong level of enclosure by the buildings with street walls is required to reinforce its 'high street' role.

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’),

- There is no continuous street wall/ podium of sufficient height of 4-6 storeys.
- The street wall / podium does not relate to the street wall podium of the town centre
- 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
- 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 domain is greater than if the visual focus is on the space of Hope Street.
- 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.

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 :

- 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 (see drawing below).
- 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.

- The built form defines the light rail open space to the west and the transmission easements to the east. These open spaces contrast with the urban character of Hope Street.
- A street wall of 6 storeys provides visual 'cut-off' of the towers, minimises the 'perceived density' of the precinct and strengthen the urban character of Hope Street.



Interface with Hughes Avenue

- 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. These are height, recessed ground floor, protruding Level 1 and the length of the frontage from the northern boundary to Hope Street without any modulation into separate elements in the built form.
- The driveway is located 3metres from the northern boundary. Adjacent residents will be impacted by the traffic entering the basement car park.
- 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 to the south along Hughes Street. The visual analysis did not address this interface.

- 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.

Interface with Northern Boundary

- The Parramatta LEP requires that the *‘form and external appearance of the development improve the quality and amenity of the public domain’* (c6.13(4)(b)) and that the *‘the impact on, and proposed improvements to, the public domain’* (c6.13(4)(d)(x)) must be addressed. 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:
 - Placement of a substation and the driveway to the car parking directly bedside the 6m wide public pedestrian path along the northern boundary.
 - A 1.9m high continuous wall 3m from the pedestrian path along the northern boundary. The only break in the wall is the stair access to the courtyard.
 - The pathway is RL 13.8. The courtyard forecourt is RL 15.7. The courtyard is a small area that serves some apartments and the stairs to the main courtyard. The main courtyard is at RL19.7, approximately 5.9 metres above the pathway. There are no views into the courtyard and no views into and out of the courtyard from and to the pedestrian path.
 - There are 3 apartments on the north / east corner of the development. These have stair access from the pathway but are 1.9 metres above the path.
 - The interface between the pedestrian path and the proposed development provides limited surveillance of the path and limited visual interest.
 - The desired future character of the precinct locates public paths and streets adjacent to and relatively level with the private courtyards. This pattern establishes the character of the public domain, provides views from the street into the courtyards and optimises the value of complementary planting. By locating the courtyard 5.9metres above the public domain all the benefits of co-location are lost.
 - At the north/ east corner of the proposed development some surveillance is provided but because of the level difference between the western parklands and the path the pathway does not have satisfactory overlooking.
 - 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.

Communal Open Space and Tower Separation

The LEP requires that the development address, *“excellence and integration of landscape design”* (c6.13(4)(d)(xiii)) and *“the location of proposed towers and other buildings, having regard to the need to achieve an acceptable relationship with existing and proposed towers and other buildings on the same site and neighbouring sites, in terms of separation, setbacks, amenity and urban form”* (c6.13(4)(d)(iv)). The form of the development does not provide an acceptable relationship with proposed towers and other buildings on the same site in terms of separation, setbacks, amenity and urban form for the following reasons:

- The separation between towers is 13.3 metres and 18.2 m 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.
 - Has all landscaping in planters at RL21.3, 600mm above the courtyard level and located above the basement. This further limits at grade activities.

- Creates two long narrow spaces with entry paths thereby minimising adequate useable area for COS.
- Is two storeys above the ground and does not provide views to and from the pedestrian pathway on the north.
- Enables overlooking from the northern end of the courtyard into the rear garden of neighbouring Hughes Avenue properties.

City Futures

The proposal underprovides non-residential floor space. From an economic outcomes point of view, concerns with this include:

1. 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 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.
2. 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 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.
3. 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.
4. 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 population-serving uses point of view. Again, no Economic Impact Statement is presented to examine this issue and justify the loss on these terms.

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.

Stormwater Engineering

Overland Flow

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.

Modelling requirements are as follows:

- Safe overland flow path up to 1% AEP considering climate change as per ARR hazard classification. The currently proposed post development flood maps shows unmanaged overland flow paths in north, west and east side of the proposed building.
- The TUFLOW modelling and mapping should demonstrate the overland flow path extent, flood depth, flood level and hazard up to 1% AEP considering climate change
- A long section with flood levels along the overland flow path need to be included. This needs to be extended up to the appropriate lengths upstream and downstream of the subject site.
- Cross-sections at appropriate intervals along the overland flow path need to be included with flood levels.

Pre and Post Development Flows at Site boundaries

The total flows exiting the site must be minimum of:

- Permissible site discharge from the subject site as per OSD policy
- Pre-development flows

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).

An electronic copy of TUFLOW Model, with all relevant files, and with a brief report outlining model inputs, boundary conditions, assumptions, impact analysis, pre-development and post-development comparison flows & levels at relevant locations, overland flow paths and flood storage changes, results, and recommendations must be provided.

Stormwater Systems

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. 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.
- ii. 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.
- iii. Appropriate tail water conditions should be incorporated in the model.

- iv. Climate change needs to be incorporated in the model as a design case.
- v. 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.
- vi. Stormwater Drainage Plan and Longitudinal Section
 - a. Stormwater Drainage Plan and longitudinal sections shall also include horizontal and vertical position of all existing and proposed service utilities.
 - b. All Longitudinal drainage sections shall include the Hydraulic Grade Line for 5% AEP and 1% AEP (with Climate Change).
 - c. 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.
- vii. 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;
 - a. 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)
 - b. 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.
 - c. All pit cover/ grate should be class D heavy duty, galvanised, bike safe and bolted down type.
- viii. Stormwater Drainage Design should consider proposed WSUD elements.

Water Sensitive Urban Design (WSUD)

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.

Impacts on Council's existing infrastructures including stormwater systems

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.

Public and Private Assets (Existing and Proposed)

A map clearly showing proposed and existing public and private stormwater/flooding assets need to be provided.

Trees & Landscaping

Level 01 Plaza Communal Open Space Design

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). Access between the two spaces is through a flight of stairs, or a convoluted route through the basement, loading dock and lifts. 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. The split-level design exacerbates the narrow layout leading to poor design, narrow planting beds, small gathering spaces and insufficient privacy and amenity to the adjacent private open spaces ('POS').

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.

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.

Planters

- Many of the planters are too narrow, some are as little as 0mm to 200mm.
- 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.
- Planters adjacent to the private balconies should be a minimum 2.5m wide to ensure there is adequate privacy screening and amenity achieved.
- The planting plans are to be adjusted accordingly.

Trees / Infrastructure

- There are a lot of trees located too close to the adjacent infrastructure, retaining walls, stormwater pipes and pits and/or building facade. This will, in time, cause unnecessary conflict and maintenance issues and impact the longevity of the trees and overall, the appearance of the soft landscaped communal open spaces will be impacted. This should be resolved at the design stage.
- It is recommended the following points are addressed in the amended landscape plans:
 - All trees are to be setback a minimum 3m from the edge of a building foundation or building façade. Where this is not feasible, replace the species with a fastigate (narrow) form alternative tree species. Council does not support heavy (asymmetrical) pruning for building clearance.
 - 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.
 - Trees are to be located a minimum 2m from any stormwater line of pit.
 - Stormwater pits and pipes are to be indicated on all landscape plans for coordination.

Planting on Structure

- 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:
 - Additional minimum dimensions are to be added to the typical details to ensure the minimum ADG soil depths are met.

- 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.
- 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 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.

Plant Mixes

- 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).
- Feature shrubs and hedge species to be identified as a minimum.
- Plant quantities/m² to be added to the planting plans and schedule.

L15 Planting

Replace the *Flindersia australis* (Fa) large tree on the podium roof terrace with a smaller species suited to this harsh environment.

Tree Details

- Trees should be self-supporting from the nursery. It is recommended the tree stake is deleted from the typical tree detail.
- Underground guying is recommended to secure the new trees on the podium structure to avoid visual clutter.
- Tree planting details must show compacted sub grade area under the root balls to mitigate against subsidence.

Deep Soil Diagram

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).

Tree Protection

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.

City Strategy

Co-living Component

- Management: No Plan of Management provided for the co-living development (accommodating up to 308 residents). The applicant should submit a Plan of Management and specify a manager's workspace.

- Facilities: All co-living units have bathroom, laundry, and kitchen facilities, which is supported.
- Communal Indoor Space: Meets minimum requirements (326m²), but the Level 1 communal area may function as a thoroughfare, limiting usability. Reconfiguration is recommended for quality, usable space.

Affordable Housing

- Dwelling Mix: Only one-bedroom and two-bedroom units proposed; no three-bedroom units. This does not meet the needs of families and lacks diversity. The applicant should revise the mix to include three-bedroom units.
- Provision Period: Affordable housing is proposed for 25 years, not in perpetuity. Council's policy supports affordable housing in perpetuity; opportunities for this should be investigated.
- Strategic Location: The site is well-located for affordable housing, but the long-term benefit is limited by the time restriction.

Communal Open Space

- Shortfall: Only 17.4% of the site is provided as communal open space (below the required 20% for co-living and 25% for affordable housing). The provision should be increased to meet minimum requirements and reduce reliance on the adjacent public park.
- Amenities: Inclusion of BBQ area, shade, and seating is supported for enhancing amenity and social interaction.

Licensed Venue (Pub)

- Alcohol Access: The proposal introduces a new pub (capacity 450 patrons, 98 hours/week), increasing access to alcohol in Melrose Park. Community concerns include noise, anti-social behaviour, and proximity to Melrose Park High School and Public School.
- Noise Impacts: Several residential units are adjacent to or above the pub, raising concerns about noise transmission. Mitigation measures for internal noise transmission are unclear and should be reviewed.
- Management: The Plan of Management should be updated after obtaining a liquor licence to ensure compliance with licence conditions.

Public Park

- Support: The proposal includes a 2,561m² public park to be dedicated to Council, which is supported.
- Delineation: The applicant must ensure clear separation between private property and public park to guarantee public accessibility.

Recommendations

- Revise affordable housing mix to include three-bedroom units for families.
- Increase communal open space to at least 20% of the site.
- Reconfigure communal indoor space for quality and usability.
- Provide a Plan of Management for co-living and specify manager's workspace.
- Investigate affordable housing in perpetuity rather than a 25-year limit.
- Update the pub's Plan of Management post-liquor licence.
- Review and mitigate internal noise transmission between pub and residences.
- Ensure clear delineation between private and public park areas

Parks & Open Space

Open Space Design

- No direct private building entrances are to be located within the dedication land to maximise useable open space and prevent privatisation.
- Pathway required along the western edge to clearly delineate the boundary between public and private domains.
- Request sections to clearly illustrate levels within the dedication land.
- Dedicated access point required for maintenance vehicles to undertake regular activities.
- Incorporate seating nodes at regular intervals to maximise amenity.

Furniture and Materials

- 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.
- 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).
- 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).
- 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.

Trees, Turf and Gardens

- Reduce garden beds to maximise the availability of useable open space (i.e. kickabout).
- Planting palette is to be consistent with the adjoining Western Parklands to ensure cohesiveness (see Council approval ref: DA/460/2024).
- Remove *Carpobrotus glaucescens* and replace *Dianella prunina* with *Dianella tasmanica* as undesirable species.
- Turfed areas to be a minimum of 2m wide for mower access clearances.

Public Domain

Consistency of materials, details, and street furniture throughout the Public Domain, Parks and Publicly Accessible Private Areas

- 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 intent is for the precinct to look and feel as a single entity with continuity of materials across the parks and public domain from Victoria Road to the River north-south, and Hughes Ave/Atkins Road to Wharf Road east-west.
- To this effect, the landscape design in the northern part of Melrose Park, which is further developed, forms an additional guide & reference while designing the parks and links. The applicant should liaise with Sekisui House for the work taking place in the Melrose North Precinct which is north of the current site.

Public Open Space

- 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, and that accessible paths and equal access requirements form the basis of all concept designs and levels considerations.
- A through site link, 4m wide, matching the material specifications and design of all other through site links in Melrose Park Precinct, as dictated by the masterplan, should be provided at the eastern edge of the park.
- This link should have 24/7 lighting as required by all other links in the precinct.
- The link must be able to provide equal access to all users.
- This link must connect to the East-West through site link being delivered as part of the Western Parklands that are north of this site, to enable the precinct-wide network of safe pedestrian accesses. This connection should be carefully considered to ensure there are no level differences within the links.

East West Through Site Link

- This application must plug in to and continue the East-West through site link being delivered as part of the Western Parklands, to enable the said master-planned network of links. Thus, 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.

Public Domain along Hughes Avenue

- 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)
- The driveway entry and crossover to the building must be coordinated with the public domain and be built to Council Standards.

Public Domain along Hope Street

- 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 any other suitable required items.

Communal Open Space/ Courtyard

- 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, and neither is it consistent with the principles of the Melrose Park Precinct Masterplan. Please ensure the courtyards are lowered, stepped to suit the ground plane if necessary, and that they have at grade entries from the public areas and through site links.

- 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.
- Ensure the communal open space is provided as a common facility for all users, irrespective of their economic status and should not be segregated. Different facilities can be available at different levels, but all facilities should be open to all residents.

Universal Access

- Access to the lower-level Pub entries via the outdoor seating podium does not provide equitable access.
- All communal areas like courtyards and rooftop gardens for all buildings, must be accessible to users of all abilities.
- All building entrances must have DDA compliant equitable accesses. Platform lifts are not supported as wheelchair entry points to any building, as all wheel chair users are not able to use platform lifts, and the lifts can have system failures. Please ensure compliant ramped entries are provided at all entrances, with regular lift entries within the buildings.

Contamination

The Detailed Site Investigation (DSI) and Remedial Action Plan (RAP) identified contamination issues, including asbestos and elevated hydrocarbons, and data gaps requiring further investigation and sampling during remediation.

The preferred remediation approach is staged excavation and off-site disposal of impacted materials, with validation reporting.

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.

Remediation must comply with SEPP (Resilience and Hazards) 2021 and Council's Land Dedication Policy, with any variations to works notified to Council and the auditor.

Upon completion, a validation report must be provided to confirm compliance with the 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.

Following asbestos removal, an asbestos clearance inspection and certificate should be completed by a suitably qualified professional (SafeWork NSW Licensed Asbestos Assessor) following removal of all ACMs from the site.

Preparation of an Asbestos Management Plan for the management of ACM building materials and asbestos-contaminated fill soil is required.

Heritage

The heritage, archaeological, and Design with Country reports are considered to be thorough and appropriate, with no built heritage concerns. 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.

Crime Prevention

Council officers recommend 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 should be reviewed after 12 months.

Planning

Residents in high density areas have been experiencing an increase in parcel theft across the LGA. As such, it is recommended that secure parcel storage facilities are considered for the two residential lobbies.

Given the proposal includes works that are to be dedicated to Council, conditions of consent must be included which require Council review and sign off of any Construction Certificate drawings which include works in land to be dedicated to Council. Recent Council consents DA/358/2024, DA/459/2024 and DA/460/2024 for nearby open spaces to be delivered by Sekisui can be referred to for appropriate conditions. These consents are available on Council's website or can be provided directly upon request.

Given the scale of development, consideration should be given to the imposition of a requirement to provide a publicly viewable artwork on the private development site, ideally in the south-east corner to be visible from both Hope Street, the light rail, and the park.

Traffic & Transport

The proposed parking arrangements (vehicles, bicycle, servicing) and traffic generation are considered to be acceptable.

Waste Management

Operational

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.

Construction

Construction and demolition waste management plan not provided. Some reports submitted refer to "managing waste in accordance with an appropriate waste management plan." Therefore, it is recommended to request this prior to commencement of works especially due to the amount of contaminated (mainly ACM) in the soil that will be disturbed.

Acoustic & Vibration:

An acoustic review should be undertaken after selection of mechanical plant (recommended at CC stage)

A full construction noise and vibration management plan recommended to be prepared at CC stage.