

Mr Michael Cassell
Secretary, NSW Department of Planning and Environment
4 Parramatta Square (12 Darcy Street)
Parramatta NSW 2150

**RE: SUBMISSION TO THE PARRAMATTA LIGHT RAIL STAGE 2 ENVIRONMENTAL IMPACT STATEMENT (SSI-10035)
ON BEHALF OF THE LANDOWNERS OF LAND AT THE CORNER OF ATKINS ROAD AND HOPE STREET, ERMINGTON**

Thank you for the opportunity to make a submission on the Parramatta Light Rail Stage 2 Environmental Impact Statement (PLR2 EIS). This submission has been prepared by Ethos Urban on behalf of the landowners of land located at the corner of Hope Street and Atkins Road, Ermington (the land). Together the lots make up an area of approximately 1.59 hectares. As site plan outlining the subject properties is shown in **Figure 1**, and the addresses which make up the land are set out in **Table 1**.



Figure 1 Ermington sites outlined in red

Address	Legal description
65 Atkins Road, Ermington	Lot 3 DP 1061032
63 Atkins Road, Ermington	Lot 2 DP 339645
61 Atkins Road, Ermington	Lot 2 DP 1036134
2B Hope Street, Ermington	Lot 2 DP 1061032
2C Hope Street, Ermington	Lot 1 DP 1061032
64 Hughes Avenue, Ermington	Lot 1 DP 128574
78 Hughes Avenue, Ermington	Lot 11 DP 3370

As shown in the below figure extract, the PLR 2 project site is shown as impacting all of the above lots:

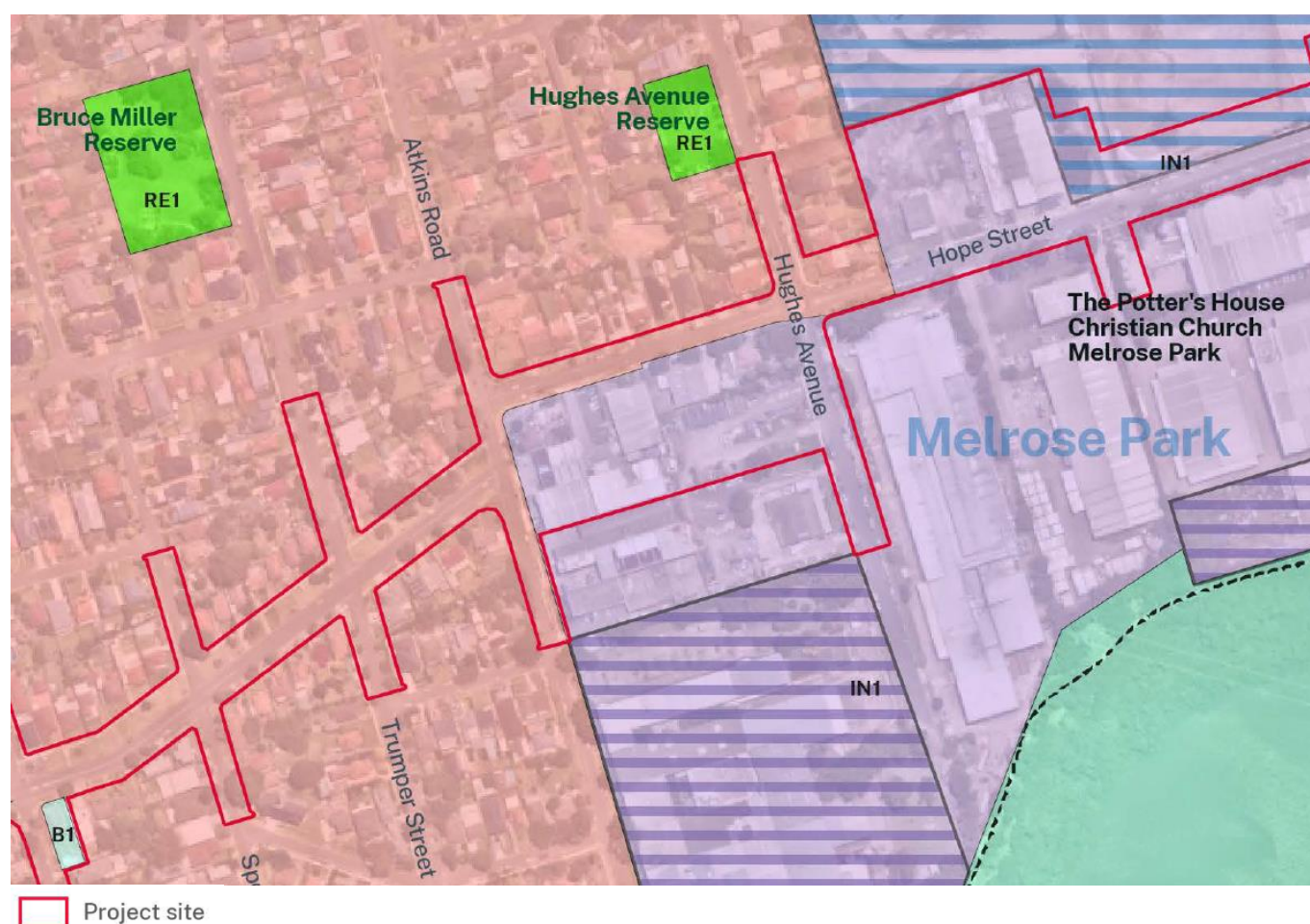


Figure 2 Extract from EIS Figure 13.3 Land use and zoning map, EIS Section 13

Source: PLR 2 EIS

Background

The land the subject of this submission is earmarked in the EIS as required to deliver the PLR 2 project, and it is noted (and therefore expected) that, should the project be approved, the compulsory acquisition of these lots will be initiated by the NSW State Government.

It is noted that the subject land forms part of a significant area of land south of Hope Street which forms part of the Melrose Park South planning renewal area. The land is included in the Melrose Park South Structure Plan, adopted by the City of Parramatta Council on 16 December 2019¹, and is planned along with the remainder of the precinct for significant residential uplift and renewal. A Planning Proposal which realises part of the residential uplift for part of the precinct has already been lodged (and has received a Gateway Determination)².

It is expressly noted that the subject land forms an integral part of this renewal precinct, and is earmarked to contribute from a planning and dwelling perspective to the renewal of the precinct. This is reflected in the 'Investigation Area' designation in the Structure Plan, with the ultimate density and FSR increase for this land to be determined through a Planning Proposal as anticipated by Council and the structure planning process. For reference, the Structure Plan anticipates an average precinct FSR of 1.72:1, with various sites contributing generally equitably to this precinct FSR, and it is expected that, subject to further investigation, that the subject is able to contribute a density commensurate with other sites in the precinct.

¹ <https://www.cityofparramatta.nsw.gov.au/vision/precinct-planning/melrose-park-urban-renewal-precinct>
<https://www.cityofparramatta.nsw.gov.au/sites/council/files/2022-03/Southern-Structure-Plan.pdf>

² <https://participate.cityofparramatta.nsw.gov.au/melrose-park-south>

Comments on the PLR 2 EIS

The landowners group make the following comments on the PLR 2 EIS:

- Section 13.1.3 and Section 5.4.5 of the EIS purports to set out how the design and project approach avoids or minimises impacts, as required by the Secretary's Environmental Assessment Requirements (SEARs). It notes that the project design will continue to be refined to "reduce potential land requirements and associated need for property acquisition". However, the proposal in its current form would require the acquisition of a significant parcel of land which makes up the corner of the subject block, with little explanation or detail provided as to why all of this land is required.

The proponent should both demonstrate and justify how the impact of the proposal in this regard has been minimised, and will continue to be minimised through design refinement. This is alluded to on pg. 13.29 of the EIS, where it is noted that the proponent will refine and try and minimise impacts, however, the purpose of an EIS is to justify it now, including why the amount of land earmarked is required and for what purpose, in detail. Any acquisition of land should be adequately justified.

It is noted on pg. 13.10 of the EIS that the majority of land to be resumed is industrial land, where it is also noted that some of the land (but not all) is subject to a proposed rezoning. As set out in the background section of this submission, it is noted that the subject land was also the subject of a planning renewal and structure plan process led by the City of Parramatta Council for Melrose Park South (which is to inform a precinct rezoning). A similar reference is made on pg. 13.24 of the EIS, where it is referenced that only one hectare of future rezoned land is impacted by the proposed project. The impact is in fact more significant, as the subject site forms part of land which is impacted. The combination of the above referenced lack of justification and a failure to take into account the rezoning process underway means the impact on future housing supply has not been properly justified or assessed

- Finally, the EIS records that the site at no. 64 Hughes Avenue is listed as a local heritage item under the Parramatta LEP (164) as the 'Bulla Cream Dairy'. However, it should be noted that Parramatta Council in its reporting of the Melrose Park South Structure Plan stated that *'it has been determined that the building has no historical connection to the dairy (Bulla) that once occupied the site, and the more recent buildings associated with the Bulla Cream Dairy are not considered to be of heritage significance'*³. An extract from the Council report dated 24 June 2019 (Item 14.1, Attachment 1, pg. 11, para. 41) which notes the above is provided below:

41. The item at 64 Hughes Avenue is a single storey brick bungalow that was constructed in 1925 and is on the corner of Hope Street. The Applicant's review recommends the item be retained. Initially thought to be associated with the operations of the Bulla Cream Dairy that occupies part of the site, a subsequent heritage review undertaken by Council of this item revealed that it has no historical connection to Bulla but is instead the residence of the original Swane's Nursery that began operating at this location prior to 1920. In addition to the residence, the surrounding landscaped area also contains tree plantings which are considered to have heritage significance. The site also contains buildings that are associated with the more recent operations of the Bulla Cream Dairy. These buildings are not considered to have heritage significance or contribute to the significance of the residence.

To this end there is a genuine question as to whether this site is of heritage significance despite its listing. Accordingly, a more detailed review and further consideration should be given through a further review of the proposed project, to determine whether the current proposal's design, which appears to unnecessarily acquire additional land in order set an alignment which protects this heritage item, is achieving the objective of minimising impacts. Additional alignment options should be investigated which give less primacy to protecting 64 Hughes Avenue in light of the above.

We thank you for the opportunity to provide a submission to the PLR 2 EIS. The landowners group welcomes the opportunity to discuss its submission, or provide further information in relation to the matters discussed in this submission if required. Please do not hesitate to contact the undersigned.

Yours sincerely,

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³ https://businesspapers.parracity.nsw.gov.au/RedirectToDoc.aspx?URL=Open/2019/06/OC_24062019_AGN_499_AT.PDF