

State Significant Development Applications: Melrose Park South East (SSD-71558962) and Melrose Park South West (SSD-71558711)

This submission addresses both of the State Significant Development (SSD) Applications in the Melrose Park South Precinct, which use an identical rationale and format, emanate from the same developer and share common or parallel documentation, including the Transport and Accessibility Impact Assessment.

The development sites fall under the Melrose Park Structure Plan, which emerged from decisions by the City of Parramatta Council ('Council') to unify planning in a holistic manner across the Northern and Southern Precincts, rather than consider individual applications in a piecemeal fashion.

Council's stated intention for Melrose Park was to create a high density precinct that was largely self-sufficient, with onsite provision of retail and other essential services, including personal services, education, health and recreation. There would also be some measure of local employment. This strategy was seen as reducing the need for residents to travel elsewhere for daily needs, as they would all be available locally.

This holistic approach was apparent in Council's requirement for a single Transport Management and Accessibility Plan (TMAP), which was prepared to determine the overall capacity of the combined Precincts (subject to infrastructure improvements), with separate yields determined for North and South. These yields were then to be used to establish a proportional distribution for each holding, enabling an orderly and equitable allocation unaffected by the timing of development proposals or the particular mix of uses (residential, commercial, retail) proposed.

The SSDAs break this process, seeking to re-apportion the TMAP based on the particular characteristics of individual sites. In particular, they argue that traffic demand be determined for the sites using a simplistic measure based solely on proposed uses, without an acknowledgement that these measures have been determined to apply to the overall characteristics of the Precinct.

Although the two SSDAs form part of a Mixed Use Precinct, they are in fact predominantly residential. While the TMAP determined capacity for the South Precinct based on a total of 7,500m² non-residential use (4,400m² commercial and 3,100m² retail), the two SSDA proposals encompass less than 15% (1,121m²) of this non-residential space, despite the sites occupying half of the total South area (94,302m² from a total of 190,319m²). The proposals thus essentially transfer responsibility for most of the non-residential provision of the Precinct to other sites (yet to be developed), despite the traffic demand factors in the TMAP being established on the basis of such non-residential facilities being locally available (and thus reducing demand to travel elsewhere). The provision of this non-residential space, together with the remaining residential space designated by the TMAP, will result in traffic demands beyond the capacity identified by the TMAP. Moreover, the additional 439 dwellings will add further to the demand for such non-residential provision within the overall profile of the Precinct, which has not been incorporated into the existing TMAP.

The Traffic Assessments proposals do not provide a full assessment of transport needs but rather use a partial reworking of the TMAP, confined just to these two sites. It is recommended that a more complete assessment be undertaken, to reflect the Precincts as a whole, including changes in the proposed number of dwellings, mix of uses, street network and new school, none of which were included in the TMAP.

Previous Council assessments have noted the 'relative isolation' of the South Precinct, much of which is beyond walking distance (800m) of the major bus routes along Victoria Road. The distance from Victoria Rd will also increase the likelihood of vehicles using local roads (such as Andrew St and Boronia St) as exit routes. This propensity will be exacerbated by the proposed internal street network providing direct connections to these local streets (eg via NSR3B).

While the proposed improvements to transport infrastructure attempt to address these issues, it should be noted that no funding has been allocated for Parramatta Light Rail Stage 2 (PLR2) beyond the recently-commenced Parramatta River bridge. While the bridge is a welcome development, it is only a minor component of the estimated total cost of PLR2, and will not provide the same level of service frequency, reliability and capacity as the light rail. The recent NSW State Budget 2025/26 provided no additional funding for PLR2 in the forward estimates, which indicates that further development will not commence until 2029 at the earliest, with no funding guarantee that it will ever be constructed.

The addition of 439 dwellings within the constrained footprint of the sites has inevitably resulted in increases in the bulk and height of the building. In addition to the substantial increase in the maximum height, there are also increases across the developments. The street-facing buildings opposite existing low-rise residential areas to the west and east of the site have increased from 4-6 storeys to 8-10 storeys, described optimistically in the Environmental Impact Statements as 'residential-scale'. The veracity of this description is highly debatable, particularly on the western boundary (Atkins Rd) where setbacks and road widths are narrower.

This submission is not opposed to the provision of affordable housing, which is self-evidently a public good, and one supported by local residents, who have argued (unsuccessfully) for increased provision in previous planning proposals and development applications in Melrose Park. However the existing Structure Plans for Melrose Park will already yield approximately 11,000 dwellings, providing wide scope and diversity to accommodate a variety of needs and housing affordability. The provision of affordable housing needs to be balanced with many other issues in determining the desired planning outcome.

Approval of the uplift sought in the two SSDAs would set a precedent for the remainder of the Melrose Park Precincts. There is already at least one such proposal in Melrose Park North and there are many other possible sites across the Precincts, since over 80% of the dwellings anticipated in the Structure Plans are yet to commence construction. Uplifts of the order of 30% across these sites would total several thousand additional dwellings, well beyond the capacity determined in the Structure Plans and TMAP.