

16 March 2012

Frankie Liang

Mr Alan Bright
Director, Metropolitan Projects & Regional Projects South
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Mr Bright

**COUNCIL SUBMISSION – MIXED USE DEVELOPMENT, COLUMBIA PRECINCT, 2-20
PARRAMATTA ROAD & 11-13 COLUMBIA LANE, HOMEBUSH, (MP 10_0143)**

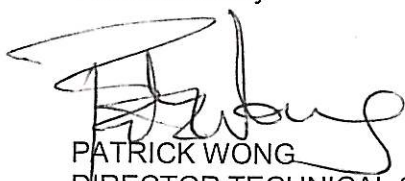
The enclosed submission has been prepared in response to the public exhibition of the Part 3A application for the Columbia Precinct Mixed Use Development (application number MP 10_0143). Thank you for the opportunity to provide comments in relation to the subject Part 3A development proposal.

Council has reviewed the exhibition documentations and is unable to support the Part 3A proposal in its present form. The key reasons as outlined in further detailed in the enclosed Council submission include:

- Significant noncompliance with Councils existing planning controls including DCP 20 and Councils draft LEP 2011 controls, particularly regarding built form configuration, height and open space.
- Grossly excessive building heights that contradict the sites regional and local centres hierarchy and relativity to public transport.
- A built form layout and height configuration that does not address the sites specific noise issues and limits the ability for quality and useable private and communal open space adjacent to buildings.
- Proposals for the use of Council owned roadways that have not been agreed to by Council.

Should you have any further queries regarding this matter, please do not hesitate to contact me on 9748 9933.

Yours sincerely



PATRICK WONG
DIRECTOR TECHNICAL SERVICES

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STRATHFIELD COUNCIL SUBMISSION
Columbia Precinct, 2-20 Parramatta Rd & 11 – 17 Columbia Lane MP 10
0143 Mixed Use Development Concept Plan Application

Introduction

This submission has been prepared by Strathfield Council in response to the public exhibition of the above Part 3A Major Project application. Council has reviewed the documents and provides the following comments.

There are a number of matters as detailed below which need to be further addressed by the applicant before the potential social, economic and environmental impacts of the proposed Part 3A Concept Plan can be fully considered and assessed. Therefore Council cannot support the application in its present form.

Background

Over the past four years Council has been working closely with the Department of Planning & Infrastructure (the Department) and the Sydney East Regional Team in progressing Draft Strathfield LEP 2011 (Draft LEP 2011). As part of this an Economic Land Use & Employment Strategy and a Residential Land Use Study has been undertaken in addition to a very detailed review of development, urban structure, urban design and planning along the Parramatta Road Corridor.

The Department issued a s65 certificate on 22 December 2011 for the Draft LEP 2011 which is currently on public exhibition. The Department including its Sydney East Region team and its policy and legal sections and Parliamentary Counsel have reviewed Council's Draft LEP 2011 and its height and FSR controls and agree that they are appropriate controls and meet the planning objectives and dwelling and employment targets set for the draft Inner West Subregional Strategy.

Council considers that its height and FSR controls for the subject sites which have been agreed by key sections of the Department have statutory and legal weight as the Draft LEP 2011 is now on public exhibition. It should be emphasised that when Council was asked by the Department to review and comment on the draft Director General's requirements in October 2010, Council provided the Department with an earlier version of the Draft LEP, FSR and height controls (refer Figure 3) that is substantially the same as Draft LEP 2011. In addition the Draft LEP 2011 are consistent with the approach of the Councils current controls such as the urban design master plan and built form patterns indicated in DCP 20.

Council is of the view that having a Part 3A Concept proposal that is contrary to Councils current planning controls and what the Department have already agreed in regard to the Draft LEP 2011 is not in

- a) the public's,
- b) the Department's
- c) the Council's or
- d) the applicant's interest.

The Major Projects Planning Assessment team, which assesses Part 3A applications should be aware of what other sections within the Department have agreed to in relation to the Draft LEPs.

As part of the preparation of Draft LEP 2011 Council has also undertaken a detailed analysis of development in the Parramatta Road Corridor, and has reviewed the performance of DCP 20.

The applicants for this Part 3A project were part of that review, and Council has met with them on several occasions. Some of the applicants have also previously submitted two development applications which relate to the subject site (DA 2008/341 which was withdrawn on 24 November 2008 & DA 2007/233 rejected by Council on 12 October 2007) that did not comply with Council's controls. Council could not support the degree of non compliance with DCP 20 and Council had no other option than to request that they be withdrawn, otherwise they would be refused.

Council has listened to and considered the concerns and issues of landowners, as well as others along the Parramatta Road Corridor in its current DCP 20 review. Council also identified a number of other critical design and sustainability issues. The review examined the controls and their effectiveness to create livability for future residents.

The current controls in DCP 20 set built form arrangements and amalgamation patterns across the corridor. This approach has continued with the Draft LEP 2011.

Council has no problem with the general floor space density proposed in the Part 3A application. However, Council has serious reservations about built form, height configurations and design impact in the applicant's submission. Council also has significant concerns regarding the lack of justification with regard to moving away from Council's current controls and Draft LEP 2011 controls.

Precinct Planning

In its review and urban design study of the Parramatta Road Corridor, for Draft LEP 2011 Council considered not only this precinct but also how it integrates with the entire Parramatta Road Corridor through to the Bakehouse Quarter. Council's planning response sought to create a harmonious and consistent urban form across the corridor area, so that it has a consistent urban character and neighbourhood (that unifies the necessary fine grain architectural variations across the site), and not a series of distinct and unrelated major developments.

Council recognises that this Part 3A Concept Plan and the introduction of Draft LEP 2011, will increase density in the area. Therefore there must be a corresponding increase in amenity, as well as services and facilities to support this density. A key part in increasing amenity is the range of open space, from high quality public open space, through to high quality private open space, all of which must be fully usable.

In undertaking its Draft LEP 2011 precinct planning, Council took the view that each of the sites within the corridor must be capable of achieving the FSR on that site within the specific height controls. Where sites across the corridor may be burdened with new public open space, or laneway formation, they are not inhibited from realizing their full FSR complement. Council's approach to precinct planning does not disadvantage any landowner.

Council's approach fully utilizes the existing laneways and streets, and proposes a few additional sections of streets in the corridor. This creates a legible structure with a hierarchy of streets and spaces that each have their own distinct identity within the general character and development of the corridor. Further, Council is seeking to have a diversity of architecture and detail built form within the precincts to create areas of interest for the future residents, workers and visitors. **Figure 1**, below gives an indication of precincts with a diversity of architectural style and form that still presents a consistent unified character.



Fig 1 Example of diversity in form and architecture, whilst having a general consistency create greater streetscape interest. It is noted that this 6 storey form is what is recommended in Council's Draft LEP 2011 for the northern, eastern and southern sections of the subject site.

Council recognises that there are similarities between Draft LEP 2011 and the Part 3A Concept Plan however substantial changes are required before the Concept Plan will reach an acceptable sustainable urban form that will provide a quality and livable residential and urban environment.

Built Form – Open Space – Amenity Relationship

A key part in increasing amenity is the range of open space, from high quality public open space, and communal private open space, all of which must be fully usable to improve the lifestyles of the future residents.

Council has undertaken an international review of higher density development, and sought to identify which design characteristics offer the best amenity and are most appreciated by its residents. This review found that:

1. Developments with a clear distinction between public and private areas of buildings and open spaces were most appreciated; and
2. Developments that had a built form that separated public areas from private areas had private open spaces that were the most lively, and had the highest use, and thus had the highest quality of life.

Council is concerned about the open space design in this application, and that there is either poorly conceived open space on podiums or where it is on the ground level, it is not truly private, and thus it will not cater for the needs of recreational/relaxation space that residents in high density will need.

Council's approach along the Parramatta Road Corridor which is documented in the existing DCP 20 is to have the buildings surrounded on three or four sides the open space, to ensure that it is contiguous in one piece and large enough to be useful. Along the Parramatta Road frontage, it is recognised that the open space could well be provided at a roof level of the podium, whereby it is an extensive green roof with useable open space.

Council requires the opportunity to provide a more detailed critique of the landscape and open space design, particularly as it must be satisfied with the design approach and to determine who should be responsible for construction. For example within the subject site, the central square and the ultimate alignment should be further discussed with Council.

In regard to the land to the eastern side of Powells Creek (20 Parramatta Road) which is part of the proposed Powells Creek Corridor land (as indicated in DCP 20 and the Powells Creek corridor landscape Design Framework), this land cannot be considered as part of the subject site and contribute to landscape and deep soil rations if the land is dedicated to Council as an offset to section 94 as the application proposes (Refer "Open Space, Landscape and Deep Soil calculations").

Despite the above issue, Council is concerned how the Powells Creek Corridor land at 20 Parramatta Road is to be designed, constructed and managed so that this area can best meet the regional and local open space demands for the community in the surrounding areas of the Parramatta Road Corridor and Homebush. It therefore would require further details and agreement before this element of the application can be supported.

Furthermore, only one pedestrian bridge is proposed to the proposed Powells Creek Corridor open space area adjacent to the western boundary. This limits the accessibility and to the regional and local open space from the residential properties and limits overall connectivity opportunities. It is recommended that the applicant construct another pedestrian bridge in the northern half of the open space area.

The proposed pedestrian bridge is marked as temporary on the concept plan, to be removed following the construction of bridges to the south, connecting the proposed public open space land to the western side of Powells Creek. There is no reason why this bridge would need to be removed once constructed, as the accessibility to the regional and local public open space would decline.

Open Space, Landscape and Deep Soil Calculations

It is noted that the Concept Plan relies on the site area of 20A Parramatta Road proposed Powells Creek corridor open space area to achieve acceptable deep soil and landscape ratio in accordance with DCP 20 requirements. Useable private and communal open space including at ground landscape and deep soil landscape areas are to be provided adjacent to each building, not in the adjacent parkland.

However the Environmental Assessment p65 indicates the land to be dedicated to Council as a section 94 offset. Land outside the subject site that is offset as part of mandatory s94 development contributions cannot be used to contribute development control standards for adjacent development i.e the subject site (e.g to assist achieving landscape and deep soil ratios). If the applicant was to dedicate this land (in addition to the mandatory s94 contributions) to Council as public open space then this land potentially could be used as part of the sites open space, landscaping and deep soil ratios and would then be acceptable.

Therefore the application is not considered to be acceptable in regard to open space, landscape and deep soil ratios and this is seriously deficient in this area and not acceptable.

Built Form – Noise – Amenity Relationship

The SLR Consulting Australia Pty Ltd (SLR) Noise & Vibration Assessment report that accompanies the Concept Plan states that the proposal is only suitable for residential development if appropriate acoustic design is undertaken. Council agrees with this.

The SLR noise and vibration report demonstrates "fairly high existing noise levels, generally caused by road traffic on the M4 Motorway and Parramatta Road, rail noise from the Western Rail Line, the Northern Rail Line and the North Strathfield Goods Loop. There is also significant noise emissions from the substation located immediately south of the proposed development site."

The subject sites are surrounded on two sides by the main western and main northern railway lines, and on a third by both Parramatta Road and the M4 Motorway, elevated, which will require a very high degree of amenity protection. Council also reviewed international best practice in high density development adjacent to noise generating infrastructure. Using the buildings themselves as noise walls, offered the best results for

the residents and protecting the public and private open spaces from noise impacts. An example is given below in **Figure 2**.

Further, Council's urban design and built form approach to noise issues has taken into consideration the feedback from the residents of the 12 storey building at 14-16 Station street (on the opposite side of the subject site) in regard to rail noise. This especially relates to the wheel screech at this very location, as freight trains particularly at night travel around the long curved section that links the western and northern lines. This limits owners ability to leave windows open and benefit from natural ventilation. Elevated buildings such as 14-16 Station Street have been proven to be not particularly suited to these specific sites due to the freight rail noise. The Part 3A proposal does not address this as the proposed towers would be exposed to these same noise issues.

Fig.2 The use of built form as a noise barrier is illustrated in the photo below – this example shows apartments alongside national road E4 (and railway) at Lilla Essingen with private open space oriented away from the noise source and bedrooms.



The built form wall along Parramatta Road can be clearly seen in the built form plan Council provided to the Department at DGR stage for this Part 3A application (refer **Figure 3**) and as indicated in Councils current DCP 20. The six level height is designed to act as a noise wall as much as being a street defining element. The plan also shows, the curving buildings around the east and southern sides also act as noise barriers to reduce the railway noise. Within the site, the buildings are setback 8m from the boundary to allow quality ground level deep soil planting to separate the buildings from

RailCorp property, which is setback a further ~22m to the railway. The deep soil planting (with no basements beneath) is there to allow full tree growth over 20m in height, and add a soft visual screen between residential development and the railway.

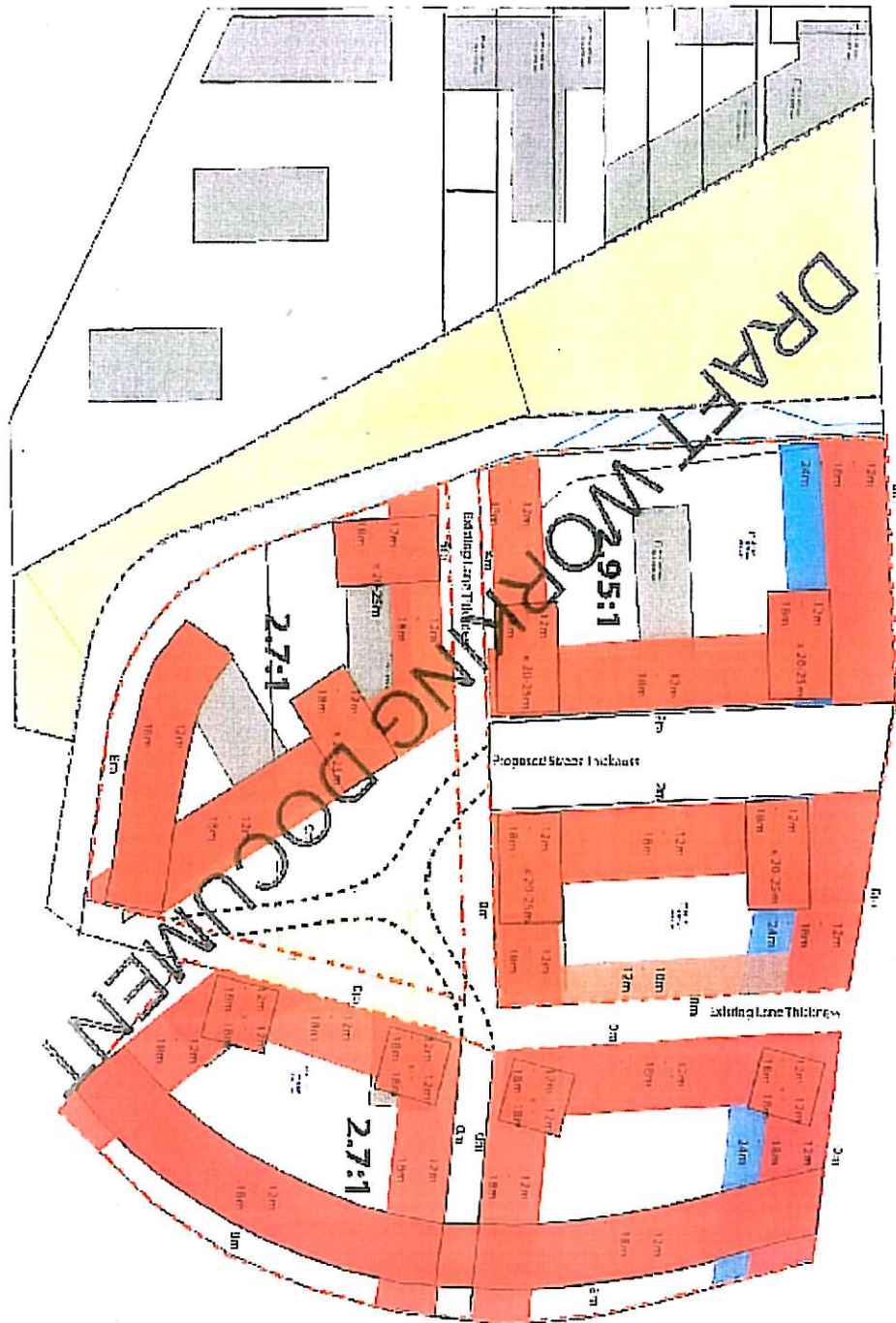


Figure 3 Early version of draft LEP, FSR, Height and indicative DCP footprints as forwarded with DGR comments to Department in October 2010.

Given the approach of this Part 3A Concept Plan, with increasing height, from low (2 storey) at Parramatta Road to high (21 storey) near the railway, it is considered that there will need to be greater noise protection for the majority of apartments, as there is no significant noise barrier, and noise can echo between the buildings. Noise from Parramatta Road and the M4 Motorway will also not be blocked by this approach in the Concept Plan.

Instead the Plan increases the number of apartments that are exposed to a negative noise environment. Even with excellent acoustic design, future residents will want to open their windows for fresh air and want to access their balconies and open the doors onto the balconies and thus defeating the acoustic design solutions.

It is reiterated, this is one of many reasons why Council took the built form design direction that is indicated in the Draft LEP 2011 Parramatta Road Corridor report. It found that it is an internationally proven solution.

Council does not support the noise sampling in the SLR Noise and Vibration Assessment Report. The results in table 2 of the report appear too low because they have not considered the full noise environment e.g a 20m high monitoring location that is not blocked by any buildings. In this regard, with 21 storey buildings proposed (60+ m), only a high level noise monitoring location would pick up the true noise impact on these buildings. The tallest location sampled has only 5m and surrounding buildings should block noise from other locations.

If the Concept Plan design approach is not strenuously tested in regard to acoustic issues such as adopting Council's built form approach, the future residents (like existing nearby high rise development) will be disadvantaged and impacted by ongoing noise issues particularly from rail. Council requests that the two different approaches to built form be assessed by the 3D acoustic model in SLR's SoundPLAN software.

Public Streets and Laneways

The concept plan changes the previously agreed and currently zoned and gazetted extension (Strathfield Planning Scheme Ordinance) of George Street. The reason for the location of this extension was not so much that it needed to be a straight extension, rather, it was to give the adjacent street block to the east formed by this extension and Columbia Lane adequate depth for a sustainable building and which also precludes the opportunity to provide on site communal open space immediately adjacent to the building. This is recognised in the current DCP 20 and how Council has designed its planning controls in the new Draft LEP 2011, and will be expanded upon in the review of DCP 20 (which is being currently worked on).

The location of the street also works with Council's approach to built form, with internalized ground level communal open space areas which we have outlined previously.

The proposals aesthetic justification that the George Street realignment creates a continuous vista along George Street has merit (e.g. Melbourne CBD streets), however a similar argument can be established for kinked city streets (e.g. Sydney CBD streets) as they create a sense of interest and mystery.

However more importantly Council does not see how the change in the alignment of George Street creating a more sustainable development, and a better urban solution. For instance the block created is narrow at the southern end, which does not give adequate building depth for natural ventilation/sunlight access further up the block, as it is too deep, yet it is also proposed as a solid building.

Further it is noted that proponent proposes the redesign of Council owned laneways, and intrudes over a Council road/laneway, none of which Council has given permission for. All of the plans need to show Council's laneway as they are at present, and prior to any re-design and re-submission, the design is to be discussed with Council as owner of this land. At present, Council cannot agree to any of the roadway design as it is shown for their land.

Council would welcome a meeting with the Department to discuss how to progress this issue.

Building Heights & Form

The Concept Plan has buildings with a lower height fronting Parramatta Rd (2 storey) but extending to 2 taller tower buildings at the southern portion of the site (21 storeys) which are significantly higher than the 5-7 maximum storey heights recommended in the Draft LEP 2011.

The proposed maximum height of 21 storeys is also significantly greater than the maximum height contained within the existing DCP 20 and Draft LEP 2011.

It is inappropriate that the tallest buildings on the site are taller than the highest order centre in the LGA which is the Strathfield Town Centre. Good regional urban design as consistent with the approach from the Metrostrategy and the Inner West Subregional Strategy uses a hierarchy of height and FSR to mark key centres and locations and allocate high density floor spaces. For example this can be seen on the north shore with the highest buildings at key centres such as North Sydney, St Leonards and Chatswood with shorter buildings along the sections of the Pacific Highway in between these centres.

The proposed residential towers are oriented north-south with the majority of dwellings either facing Parramatta Road or towards the rail lines to the south which is not in keeping with the desired built form contained within DCP 20 for the Parramatta Road Corridor and the Strathfield area in general. The Concept Plan should be redesigned to reduce the bulk and height of the building to a scale which is consistent with the surrounding area and hierarchy especially considering that the tallest building in close proximity at 14-16 Station Street is 12 stories and is already out of scale with the precinct and to better address the local noise environment (particularly the freight rail noise) associated with the subject site.

Floor Space Ratio

The proposed floor space ratio for the Columbia Lane precinct in the Concept Plan is 2.8:1 which is similar to the FSR in the Draft LEP 2011 of 2.7:1 and 2.95:1. Council

requests that an independent chartered land surveyor assess the photo montages to ensure they are accurate.

Zoning & Proposed Land Uses

The subject site is zoned B4 – Mixed Use in the Strathfield Planning Scheme Ordinance. The Draft LEP 2011 proposes to zone the site B4 Mixed Use to the northern end of the site and R4 – Residential to the southern end.

B4 Mixed Use

The EA states that a mix of retail, community, commercial uses are proposed and that the Kennards Self Storage building in the north east corner of the site will be redeveloped. The proposal is generally consistent with the B4 zone however the applicant should note that '*advertising structures, depots, recreational facilities (major and outdoor), storage premises, truck and transport depots, warehouse or distribution centers*' are prohibited land uses. Any extensions to the Kennards premise (for storage) for instance would be inconsistent with the subject zone, however it is understood that it is an existing use, with an existing amount of space on site. Thus if this were to be re-arranged with only a modest expansion, Council would not object.

R4 - Residential

The EA states that new development will accommodate commercial uses at the lowest floors (with residential above). A 'new square' is also proposed in the R4 zone.

The R4 zone seeks to encourage residential intensification with some services to meet the needs of residents. *Residential Flat Buildings, shop top housing and recreation areas* are permissible uses. The land use table in the Draft LEP 2011 prohibits all *commercial* land uses (which includes retail and office uses). As such use of the lower floors for commercial uses other than home industries, businesses and neighbourhood shops are prohibited under the Draft LEP 2011. This is to ensure commercial/retail uses do not spillover and extend across the whole corridor but are limited to the mixed use zones only.

For the subject site in the R4 zone Council however may consider a limited range of ground level retail premises e.g 'food and drink premises' in Schedule 1 "Additional Permitted Uses" subject to an adequate justification in a Draft LEP 2011 submission.

The applicant should also note Clause 6.8 which refers to development in the B4 zone and states:

(a) *Before granting consent to development the consent authority must be satisfied that:(a) the development will contribute to a general mix of residential and nonresidential land uses along the Parramatta Road Corridor.*

(b) *the development will contribute to the vertical and horizontal integration of land uses along the Parramatta Road Corridor.*

Traffic & Transport

Council is also aware that the majority of residents will want to access Strathfield Town Centre and also to Homebush station. Thus it is considered that there needs to be

significantly upgraded pedestrian and bicycle access to the Town Centre accessible from this development to support proposed the proposed residents. This would be line with the Powells Creek Corridor Landscape Design Framework such as either crossing the Northern Railway Line, and linking into proposed Powells Creek Masterplan's proposal for access from Powell's Creek corridor into Strathfield Town Centre, OR, the development could provide its own direct access to Strathfield Town Centre across railway lands.

Council considers that access to bus routes in this area are poor, and this reduces this development's ability to access public transport. With increasing development in the area, Council considers that the Department, Sydney Buses, Ministry of Transport and RMS need to get together and address this urgently, as significant developments such as this need access to buses to access sub-regional destinations beyond the one bus route that links Strathfield and Sydney Olympic Park.

Further, actual details of how any alternate transport proposals, such as mode switch to bicycle or share car will work, and this will be managed, and what facilitates will be provided. For bicycles, adequate support for infrastructure/routes will needed. It is recommended that there are two bicycle spaces per unit, with a locker for accompanying bicycle gear.

Traffic

The traffic along Parramatta Road surrounding George Street and particularly to the east towards Concord Road is severely congested during peak hours, due to the bottleneck created by the M4 entrance ramp and Concord Road. Despite the focus on transport oriented development, this proposal is unlikely to improve the current traffic situation. With approximately 650 residential units as well as substantial retail and commercial space (Concept Plan documentation states 400 new jobs) proposed within a relatively small area, it is assumed that vehicle use along this section of Parramatta Road towards Concord Road will increase.

As this is a regional traffic issue that this large scale significant development will further add to, any approval should address this matter and/or be associated with commitment and plans to address the issues by the state government and the RMS. For example improving the Concord Road Parramatta Road bottleneck such as through the M4 extension and/or changes to on ramps etc, in order to ease the existing and anticipated congestion.

Within the precinct, traffic flow within the site is likely to be impeded by the arrangement of dead ends at the south eastern end of George Street and the western end of Columbia Lane.

Parking

Council has concerns in relation to the limited on and off street parking provided within the precinct creating congestion within the site and in the surrounding areas. For instance the application proposes 806 spaces whereas a calculation based on Councils parking controls in DCP 20 and Part I of the Strathfield DCP indicates a requirement for 1,065 spaces with a shortfall of 259 spaces.

It is recommended that the applicant examine the proposed road layout, with a view to creating more opportunities for on-street parking, especially given the proposed commercial component of the development, which is expected to increase demand for short term, on-street parking.

Visual Impacts

The Visual Impact Assessment Report prepared by Richard Lamb & Associates concludes that "in regard to potential visual impacts the proposed development is reasonable and does not result in any significant negative visual effects or impacts" (Visual Assessment Report:5).

Council is aware of recent examples of projects where photomontages have been inaccurate and misrepresented the size and scale of proposed buildings and their potential visual impacts. Council would like to request that the accuracy of the photomontages be confirmed by the Department.

Provision of Services

The Concept Plan needs to demonstrate that the proposal can be adequately serviced particularly as the Infrastructure Report prepared by SLR global environmental solutions indicates that Energy Australia does not currently have capacity for estimated load and that further study is needed to determine the infrastructure required (Concept Plan Infrastructure Report prepared by SLR global environmental solutions:10).

There should be an examination of alternative energy provision, as well as a list of possible energy efficiency design options, and an estimate of how much energy these could save.

Given the scale of this development, Council would like to discuss with the proponent and Department whether this development could connect into the new waste system that Council is considering, as this could mean that any design would not need to accommodate waste trucks, which would be a cost and significant space saving.

Economic Impact Assessment

The EIA does not adequately address the DG requirements as to how the proposal supports the objectives/aims of relevant State and subregional strategies for the locality. This includes both the Sydney Metropolitan Strategy and the draft Inner West Subregional Strategy.

The Economic Assessment report by Mayoh Architects acknowledges that the proposed development is consistent with the Inner West Subregional Strategy which in broad terms encourages the development of Parramatta Rd as an "Enterprise Corridor" whilst also promoting the concentration of retail and commercial activity in established centres.

Whilst the report addresses the potential impacts of the commercial aspects of the proposal on adjoining centres such as Homebush village and Strathfield Town Centre & Bakehouse Quarter and assesses the scale and type of retailing, residential and

commercial activity appropriate for the site (Economic Assessment prepared by Leyshon Consulting:37) it does not however address in detail how it supports and differentiates the role of strategic centres, protect employment lands and to promote Parramatta Rd as an Enterprise Corridor.