

Outcome of Exhibition

DRAFT Local Strategic Planning Statement (LSPS)

Report on Submissions

August 2019

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2. Executive Summary

The purpose of this report is to provide a summary of submissions received during the exhibition of the draft Local Strategic Planning Statement (LSPS).

The draft LSPS and supporting studies were publicly exhibited from 25 June 2019 to 22 July 2019 in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* (the EP&A Act).

The LSPS was publicly exhibited on Council's website and community engagement platform *Collaborate* for 28 days. Two notifications were also placed in the local paper, the Inner West Courier, and seven notifications were placed on the following social media platforms:

- *July What's On E-News*
- *Sustainability E-News*
- *July Rhodes E-News*
- Facebook (4 notifications)

Public authorities and adjoining Councils were also notified.

A total of 81 submissions were received during the exhibition period. The primary issues relate to:

- Higher density and mixed use development, including in Planned Precincts
- Housing diversity, including social and affordable housing
- Economic development, urban services and the night time economy
- Local character
- Transport, including Sydney Metro West and active transport

The report provides a summary and a response to submissions.

3. Introduction

The LSPS

The draft LSPS has been prepared in accordance with Section 3.9 of the EP&A Act. The document gives effect to the Eastern City District Plan, implementing priorities and actions at a local level. The LSPS is also informed by other state-wide and regional policies including the Future Transport Strategy 2056 and the State Infrastructure Strategy. The LSPS outlines how these plans will result in changes at the local level.

The draft documents that comprise the Local Strategic Planning Statement include the Draft Local Strategic Planning Statement (LSPS) and the supporting technical studies:

- Draft Local Housing Strategy
- Draft Local Employment and Productivity Strategy
- Draft Local Movement Strategy
- Draft Infrastructure (Open Space and Recreation) Strategy
- Draft Infrastructure (Community) Strategy
- Draft Tree Canopy Strategy
- Draft Biodiversity Framework

4. Consultation Strategy

The draft LSPS and supporting studies were publicly exhibited for 28 days, from 25 June 2019 to 22 July 2019, in accordance with the EP&A Act.

Previous community consultations for the draft LSPS

The draft LSPS was informed by the draft technical studies and an extensive community engagement period, which built on feedback provided during the preparation of the Community Strategic Plan.

Targeted Key stakeholder engagement to inform the technical studies - November 2018 - January 2019 consultations

The targeted, issue-specific engagement was undertaken by each relevant consultancy to develop the background technical studies. The feedback was then assessed by Council to inform the priorities and actions of the studies.

Wider community consultation to inform the LSPS - February - March 2019 consultations

An online survey was used to gather and distil key insights on a comprehensive range of issues to directly inform the LSPS. Notifications of the survey were sent to all households and businesses in the LGA. The online survey was live for five weeks, from Friday 15 February to Friday 22 March 2019. There were 384 valid responses received to the survey. Due to the comprehensive nature of the project and survey, which required an average completion time of 20 minutes, the number of responses received is a testament to the level of engagement achieved.

Two pop-up consultation engagement events were also held at Union Square, Rhodes and Fred Kelly Place, Five Dock.

Public Authorities

Exhibition notification emails and a link to the Collaborate webpage were sent to the following public authorities and the general managers of adjoining Councils:

- Ausgrid
- Aboriginal Housing Office
- Environment Protection Authority (EPA)
- Create NSW Greater Sydney Commission
- NSW Health - NSW Health Infrastructure
- NSW Health - Sydney Local Health District
- Housing NSW
- Infrastructure NSW
- Office of Environment and Heritage
- Office of Environment and Heritage - Heritage Division
- Office of Environment and Heritage - Planning and Aboriginal Cultural Heritage
- Planning, Industry and Environment - Sydney Region East
- Planning, Industry and Environment - Urban Renewal
- Planning, Industry and Environment – Office of Government Architect
- Roads and Maritime Services
- School Infrastructure NSW - Strategic Planning
- School Infrastructure NSW - Schools Planning
- Sydney Metro

- Sydney Olympic Park Authority
- Sydney Water
- Transport for NSW (TfNSW)
- UrbanGrowth NSW Development Corporation
- NSW Office of Sport
- Inner West Council
- Parramatta Council
- Strathfield Council
- Burwood Council
- Ryde Council

Individual notifications

Notification emails and a link to the Collaborate webpage were also sent to local schools, local bodies and private operators, as key stakeholders for open space and recreation matters.

Advertisement in local newspaper

Two advertisements were placed in the Inner West Courier, on 25 June 2019.

Advertisement on Council website

Council's Website hosted an advertisement on the homepage, commencing 25 June 2019, and on the LSPS webpage, commencing 4 July 2019. There was also information about the LSPS exhibition on Council's Collaborate webpage throughout the exhibition period.

Articles on Council's eNewsletter

Council ran articles in three e-newsletters across City of Canada Bay: *July What's On E-News* on 1 July 2019; *Sustainability E-News* on 1 July 2019; and *July Rhodes E-News* on 9 July 2019.

Social media

Council uploaded four Facebook posts, including a tailor-made video and graphics, on 25 June, 8 July, 16 July and 18 July 2019.

5. Review of submissions

This section of the report provides responses to key matters raised in submissions received during the exhibition period.

81 submissions were received:

- 55 individual written submissions from the general public (including owners, residents, and community and sporting groups), of which there were 2 proforma submissions: one representing 24 submissions and one representing 11 submissions.
- 8 submissions from Government agencies and adjoining local Councils.
- 5 submissions from non-Government agencies, such as Community Housing Providers.
- 13 submissions from 12 developers and industry peak bodies.

Comments are provided here in response to key matters raised under the headings below:

A. Increased density in North Strathfield

- B. Mixed use development
- C. Rhodes Business Park and Rhodes Planned Precinct
- D. Housing diversity
- E. Affordable Housing
- F. Housing and jobs targets
- G. Parramatta Road Corridor Urban Transformation Strategy (PRCUTS)
- H. Local character
- I. Active transport
- J. Sydney Metro West
- K. Open space and recreation
- L. Sustainability measures and environmental protection

Part 6 of this report includes a summary of all submissions and a response to any matters that do not fall within the above categories.

A. Increased density in North Strathfield

Submissions received concerning future development in the low density areas of North Strathfield, on the western side of the rail line, generally fall within two categories:

1. The R2 Low Density land in North Strathfield and Concord West, west of the rail line, is suitable to be rezoned for High Density Residential given the proximity of this area to railway stations, a future metro station, employment precincts, the metropolitan road network, and cultural and recreation amenities.
2. The R2 Low Density land in North Strathfield is an inappropriate location for medium density residential given the density envisaged by the Parramatta Road Strategy, the prevailing character of the area and the remnant flora and fauna.

The draft Local Housing Strategy (LHS) and draft LSPS recommend that the Rhodes Planned Precinct and the Stage 1 areas of the Parramatta Road Strategy will be the primary locations where high density development will occur. The need for housing diversity and choice will be addressed by investigating opportunities for infill development of dual occupancies and terraces around the centres of North Strathfield, Concord West and Five Dock. This is reflected through Action 5.3 of the draft LSPS, which states:

5.3 Investigate changes to the planning framework to encourage a greater diversity of dwellings (such as dual occupancy and terraces) within the immediate vicinity of Concord West station, North Strathfield station and Five Dock Town Centre.

Land near railway stations that has an established neighbourhood character is ideal for this type of development because there is good access to employment and other opportunities and some degree of dwelling increase is appropriate (provided it does not compromise local character) and the established character of those areas is not necessarily suitable for high rise apartment buildings.

Whilst the LSPS includes an action to investigate potential for low scale infill development in North Strathfield and West Concord, the future of the area will also be informed by a number of projects and initiatives, as outlined below:

- *Parramatta Road Corridor Urban Transformation Strategy (PRCUTS)* - The area of North Strathfield, west of the rail line, is included in the Homebush Precinct of the PRCUTS, but it is not included in the 2016-2023 release area. The PRCUTS identifies the low density zone in North Strathfield as being retained as R2 Low Density Residential with an 8.5 metres height limit.
- *Burwood, Strathfield, Homebush Planned Precinct* - The North Strathfield area may also be included in the Burwood, Strathfield, Homebush Planned Precinct that is being investigated by the Department of Planning, Industry and Environment. As of the date of this report, the boundary of this Planned Precinct had not been confirmed.
- *Sydney West Metro* - The area may also be affected by Sydney Metro West as there may be a future Metro West station located in the vicinity of North Strathfield station, however no commitment had been made in relation to the location of a future metro station by the NSW Government at the time of the preparation of the LSPS. For this reason, Action 11.1 of the draft LSPS states:

11.1 Prior to rezoning occurring, a local planning study is to be prepared and endorsed by Council for the localities in which a Sydney Metro West station is proposed, including development sites and their immediate surrounds, that:

- *identifies opportunities and preferences for new and/ or improved areas of open space within, adjacent to or surrounding the new Metro locations,*
- *identifies opportunities for and facilitating improvements in the public domain to maximise pedestrian amenity, movement and experience;*
- *establishes preferred land uses within and around the new Metro locations;*
- *ensures that the employment functions and services around station locations are supported and enhanced as a result of the Metro project;*
- *establishes preferred built form outcomes within and around new Metro locations; and*
- *identifies the need for further studies or considerations resulting from transport infrastructure.*

It is recommended that Action 5.3 of the LSPS that relates to investigating potential for low scale, infill development (dual occupancies and terraces) in North Strathfield remain unchanged. Prior to any decision being made in relation to changes to existing planning controls, further analysis would be undertaken to determine the capacity of the area to accommodate this scale of development and any changes to the current planning framework would be the subject of additional consultation with landowners and affected residents.

Any changes to the planning framework for North Strathfield will also need to take into consideration the outcome of State Government strategies and any announcement that is made in relation to Sydney Metro West.

B. Mixed use development

A number of submissions were received concerning potential mixed use development. These submissions relate to different sites and precincts across the LGA:

1. Five Dock centre - supporting strategic planning that create a thriving retail and residential local centre in Five Dock;

2. Rhodes Waterside – requesting additional retail and mixed use outcomes;
3. Birkenhead Point - objecting to the restriction on additional supermarket floor space;
4. 1-7 King Street, Concord West – supporting additional density near metro stations and requesting that the site be identified as an appropriate location for a mixed use zoning; and
5. Submissions seeking generally more mixed-use development in Canada Bay.

Note that a number of submissions discussed mixed use development within the draft Rhodes Planned Precinct area, which is responded to in Section D below.

1. Five Dock Town Centre

A submission received on behalf of Woolworths suggesting that local centres such as Five Dock are appropriate locations for future residential and mixed use development.

Council undertook a comprehensive review of planning controls and land uses in the Five Dock Town Centre in 2013. Known as the Five Dock Town Centre Urban Design Study, the work resulted in the following outcomes:

- New public spaces, including identification of a new town square;
- A new network of lanes and through site links to increase pedestrian activity;
- New public domain improvements such as street tree planting and an upgrade to footpaths;
- An expanded B4 Mixed Use zone;
- Increased building heights on certain sites.

In addition to the Five Dock Town Centre Urban Design Study, which focused on opportunities within the centre, the draft Local Housing Strategy has also identified potential for terrace and dual occupancy infill residential development (this is discussed further in Section D below) within the immediate vicinity of the centre. The potential for medium density infill development outside of the centre, but not within it, will ensure the commercial activities within Centre are supported, rather than compromised, by the introduction of any residential uses.

Council's draft Local Housing Strategy also found that housing targets can be met within the Planned Precinct in Rhodes and from development planned along the Parramatta Road Corridor without the need to find additional sites.

It is acknowledged that the siting of a metro station within the Five Dock Town Centre will provide increased access to jobs, services and high frequency public transport. For this reason, the LSPS includes an Action to investigate opportunities for land use change around proposed metro stations. Any changes to planning controls in Five Dock will therefore only occur following the completion of a future local planning study.

2. Rhodes Waterside

A submission was received on behalf of Mirvac seeking additional retail and mixed use outcomes at Rhodes Waterside shopping centre. The submission also sought acknowledgement of Rhodes Waterside in the regional retail hierarchy.

Rhodes is a Strategic Centre pursuant to the Eastern City District Plan and the draft Employment and Productivity Strategy identifies Rhodes Waterside as having a District-level role as a retail attraction, particularly due to Ikea's presence in the precinct. The draft Strategy also identifies that the Rhodes precinct as a whole can accommodate up to 80,000 sqm of retail floor space by 2036. As Rhodes is already a Strategic Centre, it is not considered to be necessary to identify Rhodes Waterside specifically.

Priority 8 of the LSPS relates to growing investment, business opportunities and jobs in Rhodes strategic centre and Concord Hospital. Action 8.3 of the LSPS states:

8.3 Consider opportunity for additional retail floor space in Rhodes Waterside shopping centre to serve the growing resident population subject to an assessment demonstrating acceptable traffic impacts.

The LSPS does not rule out an intensification of land use at Rhodes Waterside shopping centre, however qualifies that additional retail floor space is only to occur following an assessment of traffic related impacts.

3. Birkenhead Point

Mirvac also provided a submission in relation to Birkenhead Point shopping centre. The submission objects to the limitation on additional supermarket floor space at Birkenhead Point contained within the draft Employment and Productivity Strategy and the draft LSPS. The submission also seeks additional retail and permitted mixed use / residential at Birkenhead Point and the acknowledgement of Birkenhead Point as a distinct centre in the retail hierarchy.

Priority 6 of the LSPS relates to providing high quality planning and urban design outcomes for key sites and precincts. Action 6.4 of the LSPS states:

6.4 Facilitate development of the Birkenhead Point shopping centre that:

- allows the shopping centre to grow its retail offer without the addition of further supermarket floor space, given its proximity to Victoria road retail;*
- is contingent upon access and traffic arrangements having an acceptable impact upon the surrounding locality;*
- is sensitive to the heritage and character of the remnant heritage fabric, foreshore location and scale of the surrounding locality;*
- provides direct, accessible and safe foreshore access that links with the Bay Run and Dunlop Reserve.*

Birkenhead Point has developed a strong reputation as a leading fashion and retail outlet destination. It is a significant attractor of visitors to Canada Bay and is likely to continue to draw expenditure from the surrounding area in the absence of other major retail provision provided in local centres. At the same time, the commercial precinct of Victoria Road, Drummoyne is struggling to retain retail and ground floor uses and project a coherent identity.

To ensure that the town centre of Drummoyne (Victoria Road, Lyons Road and Formosa Street) is able to achieve Council's desired aspiration of an active commercial precinct, Birkenhead Point must complement, rather than compete with Drummoyne for retail market share. Discouraging future supermarket floor space and diverting this future demand to Drummoyne will allow the Drummoyne Town Centre vision to be realised.

The LSPS does not specifically designate Birkenhead Point as a Centre in the Structure Plan as both Drummoyne and Birkenhead Point are within the same Destination Zone (DZN). The DZN is the smallest statistical area that the data is available for and therefore it is not possible to separate jobs between Drummoyne and Birkenhead Point without significant assumptions being employed. Therefore, whilst the draft Employment and Productivity Strategy has identified distribution of potential future employment floor space (retail) across the two centres, Council's vision is to develop Drummoyne as an active commercial centre complemented by Birkenhead Point. That is, Birkenhead Point has effectively been considered a centre only for the purposes of modelling.

Council's draft Local Housing Strategy found that housing targets can be met by future housing in the Rhodes Planned Precinct and along the Parramatta Road Corridor without the need to find additional sites.

Expanding the area of land zoned B4 Mixed Use in east Drummoyne is not considered to be necessary at this time.

4. 1-7 King Street, Concord West (Westpac)

A submission was received on behalf of Billbergia requesting that the LSPS recognise 1 King Street, Concord West as a new mixed use strategic site.

The site at 1-7 King Street, Concord West is zoned IN1 General Industrial and accommodates the Westpac Concord Campus. There are approximately 1,000 employees on the site. The use of the site is influenced by a variety of plans and strategies. These include:

- A *Socio Economic Study* was prepared for industrial land in Concord West in 2013 to gather an evidence base and investigate appropriate land uses for the Precinct and their possible social and economic implications. The Study recommended that 1 King Street Site (Westpac) be zoned B7 Business Park to reflect the character of the largest employment generating use in the Precinct (i.e. 89% of all existing jobs in the Precinct). This zone was also considered appropriate as it would protect the existing employment generating uses without introducing the prospect of a large quantum of alternative uses (such as retail) that would create a new and competing centre in the existing hierarchy. It would also eliminate the prospect (albeit unlikely) of the site being redeveloped to general industrial uses in the future and thereby have an adverse impact on the amenity of surrounding residential (both existing and proposed).
- The *Parramatta Road Corridor Urban Transformation Strategy* (PRCUTS) also recommends a B7 Business Park zone on the site with a maximum building height of 8.5m and a Floor Space Ratio of 1.0:1. The Strategy has statutory force through a section 9.1 Planning Direction.
- The *Eastern City District Plan* requires all industrial land in the Eastern City to be retained and managed by safeguarding all industrial zoned land from conversion to residential development, including conversion to mixed use zones. It is noted that PRCUTS prevails over the Eastern City District Plan in relation to the requirement to retain and manage industrial land.

The recommendation for a B7 Business Park Zone at 1 King Street in the Socio Economic Study prepared on behalf of Council did not advocate a longer term land use outcome. Dependant on the current statutory framework and the nature of uses surrounding the site, it may be appropriate for 1 King Street to be rezoned to alternative uses to maximise its geographic location and consolidated scale. However any such land use change would need to be informed by an updated evidence base that considers the Eastern City District Plan, the Parramatta Road Corridor Urban Transformation Strategy and the evolving land use context surrounding the site.

It is recommended that the land be identified as a key site under Priority 6 of the LSPS, with the following Action:

Prior to land use change occurring on the site known as 1- 7 King Street, Concord West, the Concord West Socio Economic Study is to be updated by Council to respond to:

- *the Eastern City District Plan;*
- *the Parramatta Road Corridor Urban Transformation Strategy;*
- *any outcomes arising from the Burwood, Strathfield, Homebush Planned Precinct;*

- *any commitment by the NSW Government in relation to a metro station in North Strathfield; and*
- *any other matter of material importance.*

The Study is to provide a recommendation on the preferred land use outcome for the site having regard to the above plans, strategies and considerations.

5. Additional mixed-use development generally

Two submissions recommend that Council collaborate closely with industry to enable mixed-use precincts.

Council will continue to work closely with landowners and the broader community when implementing the Actions of the LSPS. However, it should be acknowledged that the draft Local Housing Strategy found that housing targets can be met without the need to find additional sites, including additional land zoned B4 Mixed Use.

C. Rhodes Business Park and Rhodes Planned Precinct

1. Rhodes Business Park

Various submissions were received from landowners in relation to how Rhodes will grow as a strategic centre and specifically in relation to how and where additional commercial floor space is to be delivered. In summary, these submissions raised the following:

- The commercial landscape in Rhodes is changing and is not suited to larger commercial tenancies. Any additional commercial floor space should be limited to 410 Concord Road, Rhodes (the HP site).
- Consideration should be given to rezoning 410 Concord Road, Rhodes to B4 Mixed Use to permit retail and residential uses. The rezoning of the site will facilitate new through site connections and a mixed use environment.
- Whether the employment figures in the draft LSPS for Rhodes are consistent with the Eastern City District Plan.

Rhodes is identified as a Strategic Centre under the Eastern City District Plan. As of 2016, it was estimated that Rhodes had 15,700 jobs. The District Plan contains a 2036 job target of 22,000 to 24,000 total jobs or 6,300 to 8,300 new jobs.

Action 50 of the District Plan states:

- protect capacity for job targets and a diverse mix of uses to strengthen and reinforce the economic role of the centre.*
- Council protect employment generating capacity at Rhodes Business Park.*

It is recommended that a precautionary approach be taken in relation to the rezoning of land zoned B7 Business Park to B4 Mixed Use in the short term. In other words, the site at 410 Concord Road, Rhodes should remain B7 Business Park for a minimum of five (5) years to determine whether there is sufficient demand for office floor space in the medium to long term. This approach will ensure that there is sufficient evidence to justify a rezoning from B7 Business Park and limit potential adverse impacts on the Rhodes Strategic Centre and the Rhodes commercial market.

Where, after five years, an employment analysis adequately demonstrates that:

- that there is insufficient demand for new commercial office floor space in Rhodes; and
- there are no alternative feasible commercial land use outcomes that can be achieved on the site other than residential or mixed use development,

consideration could be given to the introduction of new uses on 410 Concord Road, Rhodes, subject to Council being satisfied that the following matters have been addressed:

1. The site should make a significant contribution to the 6,300 to 8,300 additional jobs identified for the Rhodes Strategic Centre.
2. Commercial uses are clearly separated into different buildings on the site (with no residential above) to safeguard opportunities for additional commercial floor space over time. Residential or mixed use outcomes should be delivered in separate and distinct buildings.

The risk of rezoning to B4 Mixed Use without consideration of site configuration or specific controls safeguarding against a predominantly residential development outcome is that the site will lose its flexibility value.

3. Any rezoning is to be accompanied by a master plan that is informed by genuine community engagement. The community and neighbouring properties should be provided with the opportunity to inform the height and scale of future buildings, the provision of ground floor active uses and how the site can contribute towards improving access to Rhodes station and Concord Hospital.
4. Prior to any rezoning occurring, a traffic/transport analysis is to be undertaken and demonstrate the capacity of the services on the main northern railway line (including Rhodes railway station) and on the regional road network is sufficient to accommodate the cumulative demand arising from existing and future development in Rhodes West, Rhodes East, Wentworth Point and on the subject site.

The draft LSPS will be updated to reflect the above.

It is noted that 410 Concord Road, Rhodes is not located within the Rhodes Planned Precinct. Notwithstanding, there are substantial issues that remain to be resolved before there is any certainty in relation to the location and composition of land uses arising from the Planned Precinct process.

In relation to employment figures, the draft Employment and Productivity Strategy separated the jobs for Rhodes and Concord Hospital, so that the report could focus on the specific commercial role of Rhodes.

2. Rhodes Planned Precinct

Various submissions were received from developers active in Rhodes. These submissions raised a variety of matters, however largely supported the identification of Rhodes as an appropriate location for urban renewal and new housing. The submissions also identified the ability of developers to forward fund the delivery of infrastructure where new housing is proposed.

The LSPS includes two specific Actions in relation to the Rhodes Planned Precinct:

- Action 2.1 – Work with stakeholders to deliver sustainability outcomes, social infrastructure, affordable housing, a new primary school and the new ferry wharf.

- Action 8.1 – Improve active transport connection to and through Rhodes.

A draft revised Precinct Plan for the Rhodes Planned Precinct was released by the Department of Planning, Industry and Environment (DPIE) in December 2018. Council provided a submission on the draft revised Precinct Plan and raised a number of concerns in relation to the process and absence of supporting justification. It is understood that DPIE is currently reviewing submissions and will confirm how the Planned Precinct is to proceed before the end of 2019.

The draft Precinct Plan indicates that decisions about the type and the manner of infrastructure that is to be delivered in Rhodes will be deferred to a master plan that will be prepared by major landowners in collaboration with the DPIE.

The planning framework for Rhodes has not yet been finalised and the work being undertaken by DPIE is ongoing. The Actions for Rhodes contained within the LSPS provide sufficient direction in relation to strategic planning aspirations without pre-empting the outcome of the Planned Precinct process.

D. Housing diversity

Various submissions raised issues relating to the provision of housing choices and diversity. In summary, the following issues were raised:

- Preclusion of terraces and dual occupancies in character areas under the Medium Density Code could challenge the ability to meet housing targets, particularly in close proximity to existing and future mass transit infrastructure;
- Future housing should be spread across the LGA rather than concentrated in North Strathfield and Concord West;

Council's draft Local Housing Strategy (LHS) found that housing in Canada Bay (and more broadly around Metropolitan Sydney) is becoming less affordable, particularly for young families moving into larger dwellings with more than two bedrooms. Although larger household types have a general preference for larger dwellings, many families with children are occupying two bedroom dwellings, often due to affordability and supply constraints. Based on existing planning provisions, there is likely to be an undersupply of medium density housing (terraces/semi-detached) to meet forecast demand in the LGA by 2026 and 2036.

The LHS found that a continued supply of high density dwellings could lead to an overwhelming supply of one and two bedroom dwellings and that, in order to meet the housing needs of the range of households within Canada Bay, it is essential to encourage a greater diversity of dwelling types. The LHS recommends that, whilst Planned Precincts will be the focus for delivering higher density development, the need for housing diversity and choice be addressed by encouraging infill development of dual occupancies and terraces around centres, such as North Strathfield, Concord West and Five Dock. Land near railway stations that have established neighbourhood character is ideal this type of development because (a) there is good access to employment and other opportunities and so some degree of dwelling increase is appropriate (provided it does not compromise local character) and (b) the established character of those areas is unsuitable for high rise apartment development.

It is recommended that Council continue to investigate the potential to prioritise development of dual occupancies and terraces in the areas identified as having this potential on the LSPS Structure Plan (Terrace and dual occupancy potential areas). The investigation will involve comprehensive community consultation.

This work will not preclude the development of medium density development in other areas of the LGA outside of the Local Character Areas, including development under the Medium Density Housing Code (see Section H below).

E. Affordable Housing

A number of submissions were received in relation to the provision of affordable housing:

- Eleven (11) submissions supported the affordable housing target for the Rhodes Planned Precinct and suggested that the target should increase to 10-15%.
- Sydney Local Area Health District and Shelter NSW suggested that Council's affordable housing target was too low and should be expanded to cover the entire Local Government Area.
- A submission was also received suggesting that incentives to deliver affordable housing should be developed in collaboration with industry and provided to developers.
- Submissions from developers active in Rhodes also sought concessions in relation to the delivery of affordable housing for developments in exchange for other public infrastructure.

In 2016, Canada Bay had a stock of 1,187 social and affordable housing (SAH), with public housing comprising the majority of dwellings, but a total demand for SAH of 5,058 dwellings. The majority of an additional 3,800 needed dwellings comprise a combination of those under severe rental stress (2,224 households) and those under moderate rental stress (1,556 households), together with 262 lone persons categorised as homeless. Between 2016 and 2036, demand for SAH in Canada Bay is expected to grow by approximately 1,997 additional dwellings, resulting in a total demand of 7,056 dwellings.

The Greater Sydney Region Plan, *A Metropolis of Three Cities*, includes Objective 11: Housing is more diverse and affordable, and Action 5: Implement Affordable Rental Housing Targets. The Plan recommends Affordable Rental Housing Targets as a mechanism to deliver an additional supply of affordable housing for very low to low-income households in Greater Sydney, noting that targets generally in the range of 5-10 per cent of new residential floor space are viable.

The Eastern City District Plan requires Councils to prepare a local housing strategy that will deliver needed housing, including housing affordability and choice.

In April 2018, the Australian Housing and Urban Research Institute (AHURI) published a report into *Supporting affordable housing supply: inclusionary planning in new and renewing communities*. The report found that voluntary and incentive-based schemes to provide affordable housing have delivered limited numbers of affordable housing, are resource intensive and incur high legal costs. Given the alternative mechanism available to Council, there appears to be limited benefit for Council to pursue an incentive based scheme for the delivery of affordable housing.

As the City of Canada Bay is identified within *State Environmental Planning Policy No. 70 – Affordable Rental Housing Schemes*, the most relevant means by which to implement affordable housing is through the preparation of an Affordable Housing Contribution Scheme. This approach would require 5% of the gross floor area of new development to be dedicated to Council for the purpose of affordable housing or for an equivalent monetary contribution to be made. This inclusionary zoning approach removes the need to negotiate a Planning Agreement each time land is rezoned or increases in density occur.

An inclusionary zoning approach also clarifies that the requirement to provide affordable housing should not be transferred to other types of concessions. The proposal by some development proposals in the

Rhodes Planned precinct that the need to provide affordable housing be commuted to other types of infrastructure, such as upgrades to the train platform, is insufficient to address the growing need for this type of housing in the area and in Sydney more generally.

Council's draft Local Housing Strategy (LHS) identifies the provision of affordable housing in the LGA as a priority, to ensure that the housing needs of key workers, low income households and other groups are met. The Local Housing Strategy recommends the provision of 5% affordable housing be mandated as part of major redevelopment projects and where land is rezoned for a more intensive residential use.

The Parramatta Road Corridor Urban Transformation Strategy (PRCUTS) also requires a minimum of 5% of new housing to be provided as Affordable Housing. To give effect to the PRCUTS, a draft Affordable Housing Contribution Scheme is being prepared that will be exhibited concurrently with any Planning Proposal to rezone land within the Corridor.

Council will also work with the State Government to deliver 5% of new housing as affordable housing in the Rhodes Planned Precinct. Council's feasibility testing for Rhodes Strategic Centre found that a mandated 5% affordable housing provision was financially feasible.

It is recommended that Action 5.5 of the LSPS requiring a minimum of 5% of the gross Floor Area of new development to be affordable housing remain unchanged. Prior to any decision being made in relation to increasing the required provision, further analysis would need to be undertaken to determine if an increased provision is financially feasible.

F. Housing and jobs targets

1. Jobs targets

One submission questioned the job numbers cited in Council's draft Employment and Productivity Strategy.

The Eastern City District Plan requires Council to meet a jobs target for the Rhodes Strategic Centre of at least 22,000 to 2036.

It is acknowledged that there is a discrepancy in jobs numbers between Council's draft Employment and Productivity Strategy and those in the Eastern City District Plan. The draft Strategy used the Greater Sydney Commission's definition of Rhodes as a Centre, which includes the Hospital and Rhodes East industrial precinct, as well as Rhodes Waterside and the Corporate Park. The discrepancy is due to the draft Strategy having broken down the data into smaller geographic areas (at more detailed ANZSIC and ANZSCO levels) and having looked at both industry and occupation data, to better understand what type of jobs are located and where. The draft Strategy:

- Removed hospital employment from the base data to ensure hospital floor space demand was not forecast out; and
- Removed certain industries, such as construction (those on construction sites) and home-based businesses, that just happen to locate in the Rhodes Precinct, but aren't the type of businesses looking for commercial floor space.

Separately, the Census data has a slight undercount that the draft Strategy has corrected for by making a series of allocation assumptions. So, the 15,700 from the District Plan covers a wider area and more industries than the 10,550 of Council's draft Strategy, in order to get a clearer picture of the demand for employment in the commercial and retail core of Rhodes.

2. Housing targets

One submission requested further evidence and justification in relation to the proposed housing supply and for clear targets to be provided.

The Eastern City District Plan requires Council to meet a housing target of 2,150 additional dwellings to 2021. Council is on track to meet this target.

The LHS has also developed a housing target to 2026 which demonstrates Council's capacity to contribute to the 2036 strategic housing target for the District. The Eastern City District Plan also requires Council, through the LHS, to deliver housing diversity, including a mix of dwelling types, a mix of size and a mix of affordability.

Council's draft Local Housing Strategy (LHS) establishes how much housing is needed, what typologies are needed, where housing should be located, and how Council intends to deliver the housing. The LHS has established that Canada Bay requires an additional 5,600 new dwellings to 2026 and 14,300 new dwellings 2036 to meet forecast population growth. These additional dwellings will be largely accommodated within Parramatta Road Corridor and the Rhodes Planned Precinct.

It is recommended that the LSPS remain unchanged as it is supported by the evidence-based LHS and delivers on Council's requirements under the Eastern City District Plan.

G. Parramatta Road Corridor Urban Transformation Strategy (PRCUTS)

1. Implementation of PRCUTS

A number of submissions were received in relation to the implementation of the Parramatta Road Corridor Urban Transformation Strategy (PRCUTS). Key issues raised include:

1. Kings Bay precinct – supportive of the implementation of PRCUTS;
2. Burwood-Concord precinct - submission for land in the Frame Area, which is for later release, seeking inclusion in short to medium term release area;
3. Homebush precinct - submission for land in Bakehouse Quarter supports PRCUTS, however requests identification as a local centre;
4. Bulky goods premises – two submissions were also received in relation to the provision of bulky goods premises on land with a frontage to Parramatta Road.

Following the endorsement of PRCUTS by the NSW Government, Council began working cooperatively with Burwood and Strathfield Councils to prepare an Urban Design Study and a Traffic Study for the Parramatta Road Corridor.

The finalisation of the Traffic Study has been delayed due to the complexities of the corridor and the inputs of other government agencies such as the Department of Planning, Industry and Environment (DPIE) and Transport for NSW (TfNSW). Council is currently waiting on DPIE to confirm dwelling projections for the inner west area so that TfNSW can prepare a Strategic Travel Model for the corridor. Council's Traffic consultants will then use this Model to analyse impacts of the proposed increase in vehicle trips and to identify potential solutions to mitigate impacts.

Should the traffic report reveal that there is capacity on the road network to accommodate the additional development contemplated by PRCUTS, Council will proceed to finalise the Urban Design Study and will prepare a Planning Proposal, Development Control Plan, Development Contributions Plan and an Affordable Housing Contributions Scheme for all Stage 1 areas.

2. Kings Bay Precinct

One submission to the LSPS supported the opportunity to provide transit-oriented development, public open space, new education and employment uses, retail and urban services facilities, town square, residential towers and through site-links. The submission further expresses the need for additional employment opportunities in commercial and retail services, as these are currently limited within the area.

Land uses and development controls for the Kings Bay precinct will be reflected in draft plans prepared for the Parramatta Road corridor. These plans will be the subject of further engagement with land owners and the community to ensure that high quality planning and urban design outcomes are achieved.

3. Burwood-Concord Precinct

One submission related to a proposal in the PRCUTS Frame Area, which PRCUTS proposes for later release.

PRCUTS is a 20 year plan that foreshadows development proceeding in stages. The staged implementation of the Strategy ensures that infrastructure is available to meet the needs of development over time. The PRCUTS recognises the need to support new residential development with adequate infrastructure, including major new public transport infrastructure, roads and extensive community infrastructure. Only land within the first stage has been identified under the PRCUTS as having sufficient infrastructure to support residential development under the PRCUTS. Land included in the Burwood-Concord Precinct Frame area is not included in land to be developed in the first stage, 2016-2023.

4. Bakehouse Quarter

One submission supports implementation of PRCUTS for the Bakehouse Quarter. The submission also raises concern about the recommendation in Council's draft Employment and Productivity Strategy that the Bakehouse Quarter retain the existing B3 Commercial Core zone. It also requests that the Bakehouse Quarter be included as a Local Centre in the LSPS.

The Employment and Productivity Strategy states:

Population growth to the north, south and east of the precinct will drive demand for a range of services in the future. It is important that while the current zoning should be retained, the encouragement of any future commercial role should not occur at the expense of Rhodes.

The retention of a B3 Commercial Core zone is however inconsistent with the proposed zoning of the site under the Parramatta Strategy. Given the Parramatta Road Strategy prevails over Council's local controls, the LSPS will continue to recommend a B4 Mixed Use zoning.

The Bakehouse Quarter falls within the North Strathfield local centre and does not require a distinct or separate identification.

5. Bulky goods and urban support services along Parramatta Road

One submission supported large format uses such as retail, automotive and urban services and concentration of bulky goods along Parramatta Road, but expressed the need that these be finely balanced to allow for new mixed forms and fine grain frontages.

One submission, from Transport for NSW, expressed concern with this vision for Parramatta Road on the basis that it will negatively impact the performance of a classified road and freight corridor.

The draft Employment and Productivity Strategy and draft LSPS recommend that the new local centre at Spencer Street in the Kings Bay precinct of PRCUTS provide urban support services to support the needs of the current and future local communities. The draft Strategy found that there will be an undersupply in bulky goods premises in 2026 and 2036, particularly for land within the Parramatta Road Corridor. The undersupply in bulky goods premises can be addressed through the preparation of planning controls that encourage bulky goods retail in the ground floor of new developments and through appropriate built form/design controls such as greater floor to ceiling heights.

The draft Employment and Productivity Strategy further recommends that, to reduce the impact on the flow of vehicles on Parramatta Road, lots fronting Parramatta Road in the Burwood-Concord and Kings Bay precincts be accessed and serviced from rear lanes. This recommendation will address concerns in relation to the operation of Parramatta Road and will need to be reflected in future development controls.

The LSPS responds to the need to retain and provide urban services along Parramatta Road through Actions 9.2 and 10.2, which state:

9.2 Ensure plans for the new local centre at Spencer Street in the Kings Bay precinct deliver:

- *Fine grain retail frontages along Spencer Street to create an active main street;*
- *Large floor plate uses that are sleeved behind fine grain frontages;*
- *Large bulky goods retail are concentrated along Parramatta Road;*
- *High floor to ceiling heights on the ground and second floor; and*
- *Materials and finishes that reinforce the industrial character of the precinct.*

10.2 Ensure that future built form controls and the structure of street blocks in the Kings Bay precinct facilitate:

- *Alternate access from a road, other than Parramatta Road;*
- *Double height ceilings for ground floor uses that front Parramatta Road;*
- *Rear lane low bay access for small truck and customer parking;*
- *Shared loading docks for non-residential uses.*

It is recommended that these Actions of the LSPS remain unchanged. Prior to any decision being made in relation to bulky goods and large format uses along Parramatta Road, an urban design study and development controls will be developed for the precincts. These documents will include investigation of how to best plan for active street frontages that are serviced by parking and loading/unloading facilities.

H. Local character

A few submissions addressed issues of local character and heritage, specifically that:

- local character is worth preserving;
- precluding Complying Development under the Housing Code in Local Character Areas will limit housing growth and diversity in low rise areas and limit Council's ability to meet housing targets.

The Eastern City District Plan requires Council to prepare a local housing strategy (LHS) that recognises the distinctive and valued combination of characteristics that contribute to local identity. Councils' LSPS is required to be consistent with the LHS.

In February 2019, the Department of Planning and Environment (current DPIE) released the Local Character and Place Guideline, which states that establishing local character is an integral part of a Council's strategic work, which is articulated in the LSPS, and that LEPs should be reviewed to integrate local character into Council's planning documents.

The LSPS includes actions that aim to protect areas with distinctive existing local character to enhance the character of areas that are undergoing low-scale change and to establish the desired future character for areas that will undergo substantial change, such as planned precincts.

Action 7.2 of the LSPS seeks to introduce Interim Local Character Areas into the Canada Bay LEP, which will require any new development in the Local Character Areas to be consistent with Desired Future Character Statements. The Interim Local Character Areas and Desired Future Character Statements will be drawn from those previously identified in the Canada Bay Development Control Plan. Action 7.3 aims to then subsequently review the interim local character statements and prepare new local character statements for:

- *areas identified for change, including for Planned Precincts and other localities undergoing renewal; and*
- *areas identified that have an existing distinctive urban form and character, which is to be retained and protected (Local Character Areas).*

Action 5.2 will also require development proposals outside of identified renewal areas to be compatible with the character and prevailing density of the established neighbourhoods.

It is recommended that, to protect and enhance areas with existing distinctive local character and ensure new development is consistent with Council's vision for areas planned for change:

- Actions 5.2, 7.2 and 7.3 remain unchanged;
- Council seeks an exclusion from the Department of Planning, Infrastructure and Environment from the following State Environmental Planning Policies (SEPPs):
 - *SEPP (Affordable Rental Housing) 2009* – Division 1 In-fill affordable housing - Division 3 Boarding houses; and
 - *SEPP (Exempt and Complying Development Codes) 2008* – Part 3 Housing Code and Part 3B Low Rise Medium Density Housing Code; and
- Council proceeds to investigate the potential to facilitate housing choices and diversity, including medium density housing (Dual occupancies and terraces) in the vicinity of identified local centres, as indicated on the LSPS Structure Plan. This is further explained in Council's draft Local Housing Strategy.

I. Active transport

Submissions received concerning active transport generally fall within two categories:

- Need to increase modal share for cycling, which has remained unchanged for the last 10 years ago and which will require significant infrastructure investment, including building separated cycleways. It was noted that the east-west cycling commuter link through Five Dock to the Bay Run and on to Lilyfield Rd and the City is particularly important.
- Need to continue to improve walking. Suggestions included making all paths as wide as the Bay Run pathway.

The draft LSPS recommends that the Canada Bay Bike Plan be reviewed to improve walking and cycling connections to town centres, train stations and future Metro stations, and to more efficiently integrate transport modes at public transport interchanges. This is reflected through Action 12.2 of the draft LSPS, which states:

12.2 *Review the Canada Bay Bike Plan to:*

- *address the cycling related recommendations contained within the Local Movement Strategy;*
- *ensure a legible, connected and accessible cycle network that completes missing links and investigates new safe cycling links within 1 kilometre of schools;*
- *identifies opportunities for separated paths for pedestrians and cyclists, where possible; and*

The review of the Canada Bay Bike Plan is currently underway. The review aims to develop a network of bicycle routes to meet the needs of current and future communities, prepare concept plans for the entirety of an east-west regional cycle route, and deliver a program of work that aligns available funding with the key priorities.

Action 17.1 of the LSPS is to:

17.1 *Consider and implement the Canada Bay Social Infrastructure (Open Space and Recreation) Strategy, including plans to deliver:*

- *passive recreation for activities such as sitting and walking;*

It is recommended that Action 12.2 remain unchanged, but that the LSPS be amended to strengthen encouragement of walkability by adding a new Action:

Develop a Walking Strategy that aims to build a physical and cultural environment that supports and encourages walking, with vibrant streets, parks, public spaces and neighbourhoods where people will choose to walk more often.

J. Sydney Metro West

Submissions received concerning Sydney Metro West generally fall within three categories:

- The LSPS does not adequately respond to the announcement of a Metro station at North Strathfield by proposing to retain the current low and medium density residential zoning and investigate potential uplift to only terrace and dual-occupancy housing;
- Land acquisitions for Sydney Metro West should utilise Council land and not private land; and
- Parking around Metro Stations should be restricted to take advantage of available high frequency public transport.

In November 2016, the NSW Government announced the Sydney Metro West project, a rapid mass rail link between Sydney CBD and Parramatta that is likely to run through the Canada Bay LGA. Council is aware that a number of new stations are likely to be constructed in the LGA, but the number and location is not known. In developing the LSPS, Council took a precautionary approach by assuming a number of likely station locations, at North Strathfield, Burwood North and Five Dock to ensure that local issues and aspirations would be considered during the delivery of Sydney Metro West. The LSPS articulates that

Council will work collaboratively with Government to ensure Sydney Metro West delivers high quality outcomes and public benefits. Action 1.4 of the LSPS is to:

1.4 Work collaboratively with Sydney Metro and the Department of Planning and Environment to ensure that land use change around Sydney Metro West stations delivers high quality outcomes that include:

- *a desired future character statement prepared in consultation with the community;*
- *social infrastructure, active transport and walkability; and*
- *high quality public domain and open space.*

The Transport for NSW submission clarifies that Sydney Metro West has proposed stations at North Strathfield, Burwood North and Five Dock and that planning and design work is currently being undertaken to determine station locations and preferred alignment. However, any decision for redevelopment of these areas should be deferred until the business case for Sydney Metro West is announced so as not to pre-empt any work that the State Government may undertake in the area.

- Urban design analysis is foreshadowed by the LSPS to address the opportunities and impacts that will result from the project. For this reason, Action 11.1 of the draft LSPS states:

11.1 Prior to rezoning occurring, a local planning study is to be prepared and endorsed by Council for the localities in which a Sydney Metro West station is proposed, including development sites and their immediate surrounds, that:

- *identifies opportunities and preferences for new and/ or improved areas of open space within, adjacent to or surrounding the new Metro locations,*
- *identifies opportunities for and facilitating improvements in the public domain to maximise pedestrian amenity, movement and experience;*
- *establishes preferred land uses within and around the new Metro locations;*
- *ensures that the employment functions and services around station locations are supported and enhanced as a result of the Metro project;*
- *establishes preferred built form outcomes within and around new Metro locations; and*
- *identifies the need for further studies or considerations resulting from transport infrastructure.*

Sydney Metro West is also likely to result in compulsory land acquisition to construct new stations. Council has no involvement in this process, which is highly confidential, and cannot direct Sydney Metro in selecting the land parcels that will be required to construct the stations. Land acquisition decisions will be subject to the Environmental Impact Statement process being undertaken by Sydney Metro and will not be known until the business case is released.

It is recommended that the LSPS be amended to add a new Action minimise parking close to Metro West stations and to clarify that land use planning decisions around Sydney Metro West stations will be reviewed and impacts will be addressed when Metro is announced and station locations are known.

K. Open space and recreation

Two submissions were received that raised open space and recreation issues. One submission was from the NSW Office of Sport that:

- highlighted the intended release of the District Sport Facility Plans;
- recommends minor amendments to the draft Social Infrastructure (Open Space and Recreation) improve readability, clarity and understanding including opportunity to explore shared use of courts for various codes and consider equitable access between male and female participants in allocation policies; and

One submission was from a community sporting group, that:

- supports the implementation of PRCUTS, including delivery of new open space along the Parramatta Road Corridor; and
- is requesting additional facilities to adequately plan for future growth, including new netball courts at Cintra Park and new indoor multi-purpose netball courts at ROCO.

The draft Social Infrastructure (Open space and Recreation) Strategy acknowledges an increasing participation and demand for new sportsfields and courts. In built up areas such as in the Canada Bay LGA, it is difficult to provide new sporting facilities which require a large area. The draft Strategy recommends increasing utilisation of existing sports facilities to ensure there is optimal use to accommodate additional growth as well as providing new approaches and multipurpose flexible spaces to share sport fields and courts. Any upgrade of associated infrastructure, such as potential provision of additional netball courts at Cintra Park, will need to be considered and justified based on the adequacy and future use of the space.

The existing bridge at Cintra Park is in overall fair condition. Council will work with stakeholders to improve vehicle safety in the park. Council is liaising with Sydney Water to progress improvements to the pedestrian path along the Canal including the provision of lighting as well as a suitable footpath width.

The new recreation centre at Concord Oval is due to open in 2022. The centre's design has been finalised and it features four indoor multipurpose courts, a health and fitness centre, cafe and car park. It is anticipated there will be significant demand for the new courts, which will be addressed closer to the time of opening of the facility.

It is also recommended that the LSPS be amended to include a new Action to "Review and consider implementation of the District Sport Facility Plans prepared by the NSW Office of Sport when released".

L. Sustainability measures and environmental protection

Several submissions raised issues that fall into a general category of sustainability. One submission was received from Sydney Water seeking to:

- Amend Action 13.5 to state "Complete naturalisation for Massey park, Dobroyd/Iron Cove, St Lukes Park Channel and Powells Creek;"
- Recommend developing controls to require inclusion of recycled water schemes in new developments.

Other submissions raised the following issues:

- Flora and fauna of Powells Creek need to be protected from any potential future development; and
- Sustainability initiatives in the LSPS should be reviewed to replace mandated water recycling and private electricity, with performance targets.

Council will continue to work with Sydney Water and neighbouring Councils to complete the naturalisation of Dobroyd/Iron Cove, St Lukes Park Channel and Powells Creek, and to naturalise Massey Park channel. This work will be operationalised in Council's annual work program and budget processes.

The Eastern City District Plan requires Council to deliver increased water and energy sustainability measures for future new development, including:

- Planning Priority E14 - Protecting and improving the health and enjoyment of Sydney Harbour and the District's waterways.
- Planning Priority E15 - Protecting and enhancing bushland and biodiversity.
- Planning Priority E16 - Protecting and enhancing scenic and cultural landscapes.
- Planning Priority E17 - Increasing urban tree canopy cover and delivering Green Grid connections.
- Planning Priority E18 - Delivering high quality open space.
- Planning Priority E19 - Reducing carbon emissions and managing energy, water and waste efficiently.
- Planning Priority E20 - Adapting to the impacts of urban and natural hazards and climate change.

The LSPS includes various Actions in relation to delivering these required sustainability measures. Those that relate specifically to issues raised in submissions include:

- Action 2.1 and 18.2 – Work with stakeholders to deliver sustainability outcomes for the Rhodes Planned Precinct in line with its status as a collaboration area based on Sustainability and increases BASIX targets of 50% for water and 40% for energy consumption;
- Action 18.1 - Advocate for increased BASIX water and energy targets; and
- Action 18.3 - Where appropriate, develop controls to compel developers to connect to planned recycled water schemes for all non-potable water uses.

In relation to sustainability initiative requirements, the Eastern City District Plan states that

Improving sustainability will involve incorporating natural landscape features into the urban environment; protecting and managing natural systems; cooling the urban environment; innovative and efficient use and re-use of energy, water and waste resources; and building the resilience of communities to natural and urban hazards, shocks and stresses.

As the Eastern City District grows, improvements in the way buildings and precincts are planned and designed, and the way water and energy infrastructure is delivered, can support the more efficient use of resources and lower carbon emissions.

In addition to statutory requirements for new development and alterations to existing development to implement sustainability measures, such as BASIX, Council is required to implement measures to increase water, waste and energy usage efficiencies and tree canopy coverage to future-proof our local community from the impact of water shortages, waste recycling imperative and increasing energy costs associated with non-renewable sources of energy generation.

Particular opportunity is considered to exist in relation to renewal areas and Planned Precincts as these localities are earmarked for change and have the ability to incorporate precinct or corridor wide outcomes.

6. Submissions

This section of the report provides a summary of all submissions received during the exhibition period and a response to any matters raised in submissions that are not addressed in Section 5 above.

Submissions below are organised in alphabetical order (last names) of the individual owner / resident making the submission. The names of individuals who have made a submission have been redacted.

A. Summary of proforma submissions

Two proforma submissions were received, which are summarised here:

Proforma submission number 1 - Higher density development at North Strathfield

Proforma submission number 1 was submitted by 24 land owners / residents belonging to North Strathfield Residents Group. Key issues raised were:

1. The land bounded by Conway Avenue, George Street, Allen Street and Powells Creek in North Strathfield is suitable to be rezoned to R4 High Density Residential, because the land has previously been identified as a location for higher density residential development and is:
 - a. an opportunity to realise transit oriented development and the objectives of the Greater Sydney Region Plan A Metropolis of Three Cities,
 - b. in close proximity to four railway stations,
 - c. has been earmarked as a potential Sydney Metro West Station,
 - d. proximity and connectivity to employment precincts,
 - e. proximity to the metropolitan road network,
 - f. proximity to cultural and recreation amenities and open space including Sydney Olympic Park and Bicentennial Park,
 - g. proximity to community facilities and the 'Bakehouse Quarter'.
2. Identification of the land in the LSPS as 'terrace and dual occupancy potential' is uncharacteristic of surrounding development, contrary to the principles of Transit Oriented Development and will not unlock the land use potential.
3. It is recommended that the draft LSPS and draft Housing Strategy be amended to identify the North Strathfield Precinct as an appropriate location for R4 High Density Residential development, either by:
 - a. exempting the North Strathfield Precinct from the implementation of the PRCUTS, or
 - b. by automatic triggering of identification of the land for rezoning to R4 High Density Residential pursuant to LSPS Action 11.1, which states that "Prior to rezoning occurring, a local planning study is to be prepared and endorsed by Council for the localities in which a Sydney Metro West station is proposed".

A response to the above can be found in Part A of this report.

Proforma submission number 2 - Need for more affordable housing

Proforma submission number 2 was submitted by 11 land owners / residents. Key issues raised were:

1. The following aspects of the LSPS are supported:
 - a. provision of 5% affordable housing in planned precincts and Rhodes and planning proposals is supported;

- b. the clear outline of where development will and (or will need to) occur, what such development should look like, and how it can be delivered; and
 - c. strong commitment to environmental sustainability, social and cultural diversity, and community welfare and cohesion.
- 2. The following amendments to the LSPS are sought:
 - a. increase the current 5% affordable housing provision requirement to 10-15%;
 - b. explicit listing of planning mechanisms to support the delivery of affordable housing dwellings, including S7.11 and S7.12 Contribution Plans; and SEPP 70/Affordable Housing Contribution Plans; and
 - c. commitment to new, affordable residential development that caters to households with specific accessibility and adaptability needs.

A response to the above can be found in Part E of this report.

B. All submissions

No.	Author	Summary of submission	Review and comment
1	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
2	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
3	Individual	1. The LSPS ignores the announcement of a Metro station at North Strathfield and limits the zoning to low and medium density. 2. LSPS will need to be aligned with BSH Planned Precinct and ensure value capture close to transport hubs.	1. Refer to section A and J above. 2. Refer to section J above.
4	Individual	1. New and existing developments, including the Rhodes precinct, need to provide land to support at least the current number of large trees. Incentives should be investigated.	1. The Eastern City District Plan requires Council to protect and expand the urban tree canopy. Council has prepared an Urban Tree Canopy Strategy that seeks to increase the percentage of tree canopy in Canada Bay from 19% to 25%. Future development will be required to demonstrate how it will contribute to the provision of trees.
5	Individual	1. Modal share numbers for cycling are unchanged from 10 years ago. To change these will require significant change by Council and more than has been included in last 3 years budget. More cycling infrastructure is required to create a modal shift, including building separated cycling facilities along heavily travelled roads, at intersections and to desirable locations, increasing cycling safety and cycling travel times. 2. BayBUG advocates for enforceable speed limits and street design to achieve vehicle (and cyclist) speeds in dense commercial and residential streets of 15km/h and in the less dense commercial and residential streets 30km/h.	1. Refer to section I above. 2. In the past, Council has advocated for 40km/h speed limits in high density suburbs such as Rhodes West. Council will continue to advocate for appropriate speed limits in commercial and residential areas, which are the responsibility of TfNSW.
6	Benn, Margaret / Save North Strathfield	1. North Strathfield was removed from PRCUTS and should not be rezoned from R2 to R3.	1. Refer to section A above. 2. The LSPS includes several actions that will expand the protection of heritage, including

No.	Author	Summary of submission	Review and comment
	Residents Action Group	<p>2. North Strathfield has heritage significance relating to Inter War Period houses.</p> <p>3. Flora and fauna of Powells Creek need to be protected from any potential future development.</p> <p>4. Future housing should be spread across the LGA rather than concentrated in North Strathfield and Concord West.</p>	<p>in the Bakehouse Quarter, and via an LGA-wide heritage study to be undertaken.</p> <p>3. Refer to section L above.</p> <p>4. The LSPS does not explicitly preclude higher density development in low-density residential areas, although Action 5.2 of the LSPS is to ensure that development is consistent with Council's desired future character.</p> <p>It is recommended that this aim be further strengthened and the LSPS be amended to clarify that, outside of identified renewal areas, land use change will be limited and that development proposals will need to reflect the prevailing scale and density of the established built form in the locality and be supported by an evidence-base that is equivalent to at least that undertaken for this LSPS.</p>
7	Bilbergia	<p>1. LSPS and LHS maps of Rhodes planned precinct should be shown as including the 'Station Gateway West Character Area' west of the railway, as per the exhibited Rhodes Revised Draft Precinct Plan 2018, and references to 'Rhodes East' should be replaced with 'Rhodes Planned Precinct'. Rhodes Planned Precinct should be progressed as a priority.</p> <p>2. Dwelling numbers in the Rhodes Planned Precinct need to reflect the proposed number of additional dwellings, comprising 3,600 additional dwellings east of the railway line and 600 additional dwellings west of the railway line in the Station Gateway West site.</p> <p>3. Greater flexibility needs to be given for the proposed 5% affordable housing target within the Rhodes Planned Precinct, with the ability for concessions to be given for</p>	<p>1. Refer to section C above.</p> <p>2. Refer to section F above.</p> <p>3. Refer to section E above.</p> <p>4. It is understood that the number of dwellings that will be possible in the Rhodes Planned Precinct will be informed by a master planning process. This process will determine whether acceptable planning impacts are generated and whether the design outcome exhibits design excellence. The State Government will then determine the type and amount of contributions developers will make towards infrastructure in the precinct.</p>

No.	Author	Summary of submission	Review and comment
		<p>developments that deliver other forms of public and social benefits.</p> <p>4. The proposed 4,200 dwelling in Rhodes Planned Precinct are essential for leveraging funding for upgrades to the Rhodes railway station.</p>	
8	Bilbergia	<p>1. Generally supportive of Council's vision to deliver new development in close proximity to high frequency public transport.</p> <p>2. Mixed-use precincts can play a significant role in delivering housing supply, choice and affordability in key locations.</p> <p>Land at 1-7 King Street, Concord West, is an opportunity for a mixed-use / residential centre development, due to its size, consolidated lot, single ownership and proximity to Concord West train station.</p> <p>3. The site is identified as having terrace and dual occupancy potential, which could challenge the ability of the LGA to house the forecast increased population. The site is adjacent to Concord West station and areas within walking distance of North Strathfield Station and Concord West Station should be considered as a strategic opportunity for additional density. Precincts within walking distance of Metro stations should be planned to accommodate high density development to deliver on housing targets, while at the same time preserving the existing character of other parts of the LGA by clustering new development in certain high-amenity areas. Recommend the LSPS designate precincts with these characteristics for further investigation.</p> <p>4. Supportive of Action 11.1 to prepare and endorse a local planning study prior to rezoning surrounding Concord West and future Metro stations, but requests that certainty and commitment to the timing of this strategy is given (pending</p>	<p>1. Noted.</p> <p>2. Refer to section B above.</p> <p>3. Refer to section A above.</p> <p>4. The LSPS states that Action 11.1 is a short-term action, to be completed within 5 years. The timing will be able to be determined more precisely when the Sydney Metro West project is formally announced.</p> <p>5. Action 15b of Council's draft Employment and Productivity Strategy is to require any major residential redevelopment within 200 metres of a future metro station AND within the current B4 zone to include two storeys of commercial floor space above ground floor retail. It is important that accessibility to Sydney Metro West mass transit is shared by a range of land uses. The delivery of a Metro is likely to generate an increase in demand for residential development and, as part of this, any development within 200 metres of the Metro station and in the B4 zoning should be required to provide for future local office demand by providing one to two storeys of commercial floor space.</p> <p>6. The LSPS states that Action 9.3 is a medium-term action, to be completed within 6-10 years. The timing will be able to be determined more precisely when the Sydney Metro West project is formally announced and LSPS Action 11.1 is complete.</p>

No.	Author	Summary of submission	Review and comment
		<p>commitment to the Metro station locations) and industry involvement is ensured early on in the process.</p> <p>5. Action 9.4, requiring commercial floor space above ground level retail for development within close proximity to future Metro stations, appears pre-emptive. Viability of commercial floor space is better suited for Rhodes, noting that the highest and best use for sites generally outside strategic centres in the Canada Bay LGA is for residential development.</p> <p>6. Requests timing and funding for Action 9.3, that Council undertake a study of how retail and commercial floor space can be accommodated in local centres be completed before land use change occurs, be considered as part of the LSPS.</p> <p>7. Certain sites, including the subject site, have capacity for additional residential and retail density as a town centre. Council should recognise the merit that site-specific planning proposals provide in unlocking the potential of particular strategic sites and develop a framework for site-specific planning proposals.</p> <p>8. The LSPS makes a number of commitments that are likely to increase the costs associated with new development. Council should develop a priority or 'action' to develop an infrastructure contributions plan which does not stifle redevelopment opportunities or contribute to the issue of housing unaffordability.</p> <p>9. The LSPS should take an evidence-based approach and clearly articulate a long-term 20-year planning and land use vision for housing and employment growth for the LGA.</p>	<p>7. Refer to section B above.</p> <p>8. Whilst planning for housing is important, it is also necessary to ensure that residents have access to high quality environments and a broad range of housing choice. The Sydney East District Plan requires metropolitan Councils to prepare Affordable Rental Housing Target Schemes to deliver housing that meets the needs of households on moderate, low and very low incomes, as identified in Council's Local Housing Strategies. The Sydney East District Plan also requires Councils to contribute towards a tree canopy target of 40% for Sydney. Under the NSW Government Architect's Draft Urban Office Tree Canopy Guide this target is reduced to 25% minimum by the year 2036 for medium to high-density residential and light commercial areas.</p> <p>9. Seven strategies have been prepared to provide the evidence for the LSPS, including a Local Housing Strategy. The LSPS clearly articulates the basis for strategic planning in the area, the planning priorities, actions required to achieve the priorities, and the basis on which Council will monitor and report on implementation of the actions, as required by the <i>Environmental Planning and Assessment Act 1979</i>. It established Council's planning vision to meet the needs of the community for the next 20-years.</p>

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9	Bilbergia and Hewlett Packard	<p>1. Overarching elements of the draft LSPS are supported and generally align with the landowners' vision for the site at 410 Concord Rd, Rhodes as a mixed-use development.</p> <p>2. Landowners have prepared a Master Plan for 410 Concord Rd, Rhodes that seeks to rezone the land from B7 Business Park to B4 Mixed use; increase in commercial office space above the current NLA (commensurate with the heights for Rhodes Planned Precinct) on part of the site and concentrated in tower buildings; and additional uses on the remainder of the site, including short term accommodation, residential development and community uses, and open space, and through site pedestrian connections. Commercial floor space would be increased and consolidated at the northern part of the site, close to the station, with other parts of the site used for other purposes.</p> <p>Mixed use development at the site has the potential to connect the Rhodes Strategic Centre and railway station to Brays Bay and the Concord Hospital beyond (in the short to medium term with a mixed use redevelopment of the site).</p> <p>The site represents one opportunity for increased commercial office employment, in addition to others: B2 Local Centre zoned sites immediately adjacent Rhodes Station within the Planned Precinct; expansion of Rhodes shopping centre; and growth of Concord Hospital.</p> <p>3. Due to the extent of recent development, Rhodes may not be able to accommodate the employment growth targets in the Eastern City District Plan for commercial offices. The site is currently underutilised in terms of the potential to accommodate commercial floor space under the</p>	<p>1. Noted.</p> <p>2. Refer to section C above.</p> <p>3. Refer to section F above.</p>

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		Canada Bay LEP. The Master Plan supports a significant development of the site occurring over the next 10 years in line with A Metropolis of Three Cities and Eastern City District Plan targets.	
10	Billbergia Group and Prolet	<ol style="list-style-type: none"> 1. Generally supportive of the vision for Rhodes and Canada Bay LGA in the Draft LSPS. 2. Population increase is driving demand for housing, particularly in strategic locations near public transport and employment. Rhodes is a key centre with good transport connections. 3. Rhodes currently accommodates approximately 16,500 jobs. The LSPS cites 10,500 jobs. This is also inconsistent with the Eastern City District Plan 2016 jobs estimate of 16,700. 4. Requirement to deliver affordable housing should be able to be offset by provision of other public infrastructure. 5. Public and transport infrastructure programs (Action 8.1 and Action 12.3) to support Rhodes Planned Precinct should be amended from 'short to long term' to 'short term'. 6. Billbergia is proposing to provide increased open space, retail opportunities and a new ferry wharf at the Leeds Street foreshore. Billbergia and Prolet are proposing to provide a pedestrian overpass connecting Rhodes West and Rhodes East to McIlwaine Park, subject to the master planning processes for Rhodes Planned Precinct, facilitating greater access to the park and foreshore and increased recreational opportunities. 7. Sustainability initiative in the LSPS should be reviewed to replace mandated water recycling and private electricity, with performance targets. 8. 25% tree canopy target (Action 16.5) may not be achievable in dense areas, 	<ol style="list-style-type: none"> 1. Noted. 2. Noted and agreed. Note, however, that Metro West is intended to provide greater capacity public transport for areas to the south of Rhodes. 3. Refer to section F above. 4. Refer to section E above. 5. Decisions about public and transport infrastructure that is necessary to support the Draft Rhodes Planned Precinct residential uplift are the responsibility of NSW Government. Outside of the Planned precinct, Action 8.1 of the LSPS aims to improve active transport connections within the Rhodes Strategic Centre. This work will be delivered through Council's annual budgetary processes, over the short to medium term (0-10 years). This timeframe is anticipated to align with the completion any major new developments within the precinct. 6. Noted. 7. Refer to section L above. 8. A precinct-wide approach to tree planting will be adopted and mechanisms to achieve the target without compromising financial viability of developments will be investigated through the application of the Urban Tree Canopy Strategy. A precinct wide approach is important to ensure that land owners in some areas of the

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		such as Rhodes Strategic Centre, and should be amended to apply LGA-wide.	LGA are not 'carrying the weight of' other areas.
11	Bridge Housing	<p>1. In 2016, Canada Bay's stock of social and affordable housing (SAH) was comprised of mainly public housing. There was a shortfall of approximately 5,000 SAH dwellings. These are needed to provide for households under severe rental stress, moderate rental stress and lone persons categorised as homeless. The demand for SAH in Canada Bay is expected to grow by approximately 2,000 additional dwellings, resulting in a total demand to 2036 of approximately 7,000 dwellings.</p> <p>The potential to deliver more affordable housing via joint ventures with CHPs should be investigated.</p>	1. Refer to E above.
12	Individual	<p>1. UrbanGrowth rezoning of the eastern area of Strathfield Triangle under PRCUTS applied inconsistent controls. This will result in overshadowing and loss of privacy for properties at 1 to 41 Swan Ave. This area is just outside of Strathfield station and should be zoned as commercial / mixed use.</p> <p>2. More residential development at Strathfield Triangle needs to be supported by more commercial uses, which are currently inadequate.</p>	<p>1. Noted. The rezoning of land under the Parramatta Road Strategy is yet to be undertaken and there will be an opportunity to make public submissions on any proposals during this process.</p> <p>2. Given the Strathfield Triangle is located in close proximity to the Strathfield Town Centre, the primary land use outcome contemplated for the precinct was residential apartments.</p> <p>Where revised land use controls are applied to this precinct, Action 6.1 of the LSPS provides criteria to guide appropriate development outcomes.</p>
13	Canada Bay Bicycle User Group Inc (BayBUG)	<p>1. The LSPS needs to do more to increase the number of people cycling, given that the number of people cycling is the same it was 10 years ago. Land allocation decisions are required to generate a modal shift.</p> <p>The LSPS, reflected in the LEP and DCP, needs to acknowledge that the types of cycling facilities most likely to</p>	<p>1. Refer to section I above.</p> <p>2. Council will continue to advocate for appropriate speed limits in commercial and residential areas, which are the responsibility of TfNSW.</p> <p>3. The submission will form part of the consideration for Council's</p>

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		<p>encourage cycling by all rider types require land allocation decisions.</p> <p>2. Advocates for enforceable speed limits and street design to achieve vehicle (and cyclist) speeds in dense commercial and residential streets of 15km/h and in the less dense commercial and residential streets 30km/h.</p> <p>3. Makes numerous detailed recommendations to improve safety and amenity of cycling in the LGA.</p>	Bike Plan, which is being currently reviewed.
14	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
15	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
16	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
17	Community Housing Industry Association NSW (CHIA)	1. Community housing providers (CHPs) are currently managing almost 250 properties in Canada Bay including around 40 affordable rental homes. There is a need for affordable housing in the LGA. The submission recommends that councils partner with registered CHPs to develop council owned land to deliver affordable rental housing.	1. Refer to section E above.
18	Colliers International	1. The vision for the Bushell's site in the LSPS is supported.	1. Noted.
19	Concord 71 Pty Ltd and ES Developments Pty Ltd	1. Seeking land at intersection of Parramatta Road and Melbourne Street, Concord to be included in PRCUTS short to medium term land release area. The land could deliver a mixed use development on an amalgamated site and a fine-grain laneway network, in close proximity to amenity and services.	<p>1. The suggestions made in the submission are too detailed for the LSPS. The submission will be considered during the preparation and implementation of planning controls for the Parramatta Road Corridor.</p> <p>Refer to section G above.</p>
20	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
21	Crown Group	1. New mixed-use community at 155-167 Parramatta Road, Five Dock in PRCUTS Kings Bay precinct, is an opportunity to provide transit-oriented development, public open space, new education and employment uses, retail and urban services facilities, town square,	<p>1. Noted.</p> <p>2. Refer to section G above.</p> <p>3. Refer to section G above.</p> <p>4. The LSPS aims to advocate for and work towards delivery of dedicated rapid public transport</p>

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		<p>residential towers and through site-links.</p> <p>2. Additional employment opportunities in commercial and retail services, is required, as these are currently limited within the area.</p> <p>3. Large format uses such as retail, automotive and urban services on Parramatta Rd are supported, but need to be finely balanced to allow for new mixed forms. Further clarification of the identified land use need along Parramatta Road Corridor is needed. Fine grain frontages screening large floor plate uses and retention of industrial character, particularly through the concentration of bulky goods along Parramatta Road, is supported.</p> <p>4. New mixed-use community at 155-167 Parramatta Road, Five Dock is an opportunity to provide a public transport 'super stop'.</p>	and place-based outcomes along the Parramatta Road Corridor.
22	Individual	1. High density, high-rise development in North Strathfield is supported.	1. Refer to section A above.
23	Individual	1. High density, high-rise development in North Strathfield is supported.	1. Refer to section A above.
24	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
25	Ecove	<p>1. Rhodes has few of the marketable features of the vastly superior nature and scale of major centres of Macquarie Park and Parramatta, in spite of ongoing undersupply and pent up demand in these markets (evidenced by strong take-up and low vacancy rates). The majority of new development proposed in the nearby centres of Sydney Olympic Park and Macquarie Park will be in the form of low to medium rise campus style office buildings featuring large scale floorplates.</p> <p>2. The subject site at 'Station Gateway West' has a size and configuration to support much smaller floorplates and a high-rise structure would be required. This would considerably</p>	<p>1. Noted. The Department of Planning, Industry and Environment is responsible for the planning of the Rhodes Planned Precinct.</p> <p>2. Refer to section C above.</p>

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		<p>limit demand, rental potential and add substantially to construction cost compared with a typical lower rise campus style building offering a similar floor area.</p> <p>Recommend locating appropriate scale office accommodation over multiple sites or on sites capable of supporting campus style office buildings with large floorplates. 410 Concord Road is the main opportunity to support a campus style facility similar in context to Rhodes Corporate Centre, and also on sites further to the north where there is greater width between Concord Road and Blaxland Road.</p>	
26	Environmental Protection Authority (EPA)	<p>1. LSPS should be revised to include guidance for reducing exposure to urban hazards, including noise, air pollution and soil contamination. Amend Priority 18 to include reference to waste reuse / recycling and circular economy opportunities.</p> <p>2. Amend Priority 19 to include reference to soil contamination as a hazard, noting the history of industrial uses in the LGA and presence of sensitive uses, such as schools and housing.</p>	<p>1. Action 4.1 has been updated to reference improvements to the Canada Bay DCP in relation to addressing impacts associated with noise and air pollution.</p> <p>It is recommended that Action 18.4 be amended to refer to development of a circular economy.</p> <p>2. Soil contamination as a hazard is already dealt with under the EP&A Act.</p>
27	Individual	<p>1. Perception that Drummoyne is sad and disjointed needs to be addressed. There is not enough focus on Drummoyne local centre and immediate surrounds.</p> <p>2. Sites within conservation areas that immediately adjoin local centres should be considered for co-living development for, especially student housing.</p>	<p>1. The perception that Drummoyne has a poor public domain and pedestrian experience is acknowledged. Whilst this outcome is partly influenced by the existence of main roads and traffic volumes, Council has committed to improving the quality of the area through the preparation of an Urban Design Study.</p> <p>The draft Study identifies a variety of initiatives relating to improved development controls, new paving, new street trees and new public art.</p> <p>Action 9.1 of the LSPS is to finalise the Study to help revitalise and</p>

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			<p>improve the urban amenity of the area.</p> <p>2. Drummoyne is ill-suited for student housing given the relatively low numbers of students living in Drummoyne compared to other areas such as Rhodes.</p> <p>Redevelopment of conservation areas as high density student housing may also result in development that is not compatible with heritage qualities of the area and the expectations of the community.</p>
28	Individual	1. High density, high-rise development in North Strathfield is supported to take advantage of Sydney Metro.	1. Refer to section A and J above.
29	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
30	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
31	Individual	1. Requirement that development provide 5% affordable housing in planned precincts, Rhodes and planning proposals should be increased to 10-15% and applied to entire development, not just uplift.	1. Refer to section E above.
32	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
33	Individual	1. Housing diversity investigation area at North Strathfield station should be changed to R4 to take advantage of Sydney Metro.	1. Refer to section A and J above.
34	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
35	Inner West Council	<p>1. Supports the implementation of PRCUTS following finalisation of precinct-wide traffic and mass public transport solution on Parramatta Road, including delivery of new open space along the Parramatta Road Corridor.</p> <p>2. Seeking a co-ordinated place-based approach for adjacent areas, particularly Kings Bay, to achieve desired character and refine the vision of PRCUTS, including provision of urban services.</p>	<p>1. Council will continue to advocate for public transport outcomes along Parramatta Road and urban design, including provision of social infrastructure.</p> <p>2. Refer to section G above.</p> <p>3. Refer to section E above.</p> <p>4. Council will continue to consult with Inner West Council for cross-border issues.</p>

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		<p>3. Supports precinct-wide urban design study for affordable housing and local contributions.</p> <p>4. Seeking to work with Council to identify missing cross-border cycling connections, and Blue and Green Grid. Infrastructure.</p>	
36	Inner West Netball	<p>1. Association has experienced 25% membership growth over the last five years. Requests additional facilities, to adequately plan for future growth, including new netball courts at Cintra Park and new indoor multi-purpose netball courts at ROCO.</p> <p>2. Requests management rights of the indoor centre at ROCO.</p>	<p>1. Refer to section K above.</p> <p>2. The management and use of the facilities at ROCO will be considered in line with Council policy.</p>
37	Jago, Councillor Charles	1. Refer to Proforma number 2	1. Refer to section E above.
38	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
39	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
40	Land and Housing Corporation (LAHC)	1. Council should work with NSW Land and Housing Corporation to support the renewal and provision of social housing within the LGA, consistent with the Communities Plus program, by facilitating land use planning pathways for public housing in suitable areas.	1. Whilst, Council's LHS recommends the provision of social housing be increased, the provision of social housing is an operational responsibility of the NSW Government, generally delivered by Community Housing Providers (CHPs). It is not a land use planning responsibility of Council.
41	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
42	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
43	Individual	1. Land acquisitions for Sydney Metro West should rely on Concord Oval and Council land and not private land.	<p>1. Refer to section J above.</p> <p>2. Concord Oval is currently being redeveloped under the Redevelopment of Concord Oval (ROCO) project, which is being funded by the NSW Government. This is consistent with the findings of Council's Social Infrastructure (Open space and Recreation) Strategy, which found that there is a priority need to maximise use of</p>

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			existing open space and to create more recreation and open space, particularly to support new residential development in the PRCUTS precincts of Burwood-Concord and Kings Bay.
44	Individual	1. Movement Strategy omits east-west cycling commuter link through Five Dock to the Bay Run and on to Lilyfield Rd and the City. This is the most popular bicycle corridor in Canada Bay, despite lack of specific traffic facilities for cyclists along it. The crossings of Great North Rd and Timbrell Drive/Henley Marine Drive are key deficiencies. Could be funded using budget allocation for Gipps/Queens cycleway.	1. Refer to section I above.
45	Individual	<ol style="list-style-type: none"> 1. Supports character and conservation zone retained on the western side of Concord Rd in Concord West including the Yaralla and Walker Estate precinct. 2. Former Concord RSL site being preserved for community use is supported. 3. Need to increase support for the Arts in Concord and Rhodes, including a regional gallery with a performing arts space. 4. Need to continue to improve off road cycling and walking, including making paths as wide as the Bay Run the standard width. 5. Concord and Concord West have a particular character that is worth maintaining. Incentives could be offered. 6. There is a general oversupply and poor construction of multistorey towers, so need to rethink the rest of the Rhodes peninsula to encourage a more cohesive design with less height and greater attractiveness, like Breakfast Point or Cape Cabarita. 7. Need to provide for affordable housing in Rhodes area. 	<ol style="list-style-type: none"> 1. Noted. Refer also to section H. 2. Concord RSL is zoned RE2 Private Recreation and the future of this site is restricted to those uses that are permissible in the zone. Council will continue to work with the landowner to ensure that any future use of the site is appropriate and has an acceptable impact upon the surrounding locality. 3. Council will continue to investigate opportunities to provide for the creative and performing arts within the LGA. In the short to medium term, this is likely to take the form of investigating opportunities to increase the availability of multipurpose spaces and community centres, as recommended by the Community Facilities (Social Infrastructure) Strategy. 4. Refer to section I above. 5. Refer to section H above. 6. Noted. Reference is made to Council's submission to the NSW

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			<p>Government on the draft Revised Precinct Plan for Rhodes which raised a variety of concerns in relation to the proposed development outcomes.</p> <p>7. Refer to section E above.</p>
46	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
47	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
48	Mirvac	<p>1. LSPS should acknowledge Birkenhead Point as the second largest retail centre in the LGA and add Birkenhead Point as a 'centre'. Should support additional retail and permitted mixed use / residential at Birkenhead Point. There is a need to not restrict supermarket floor space at Birkenhead Point.</p> <p>2. LSPS should acknowledge Rhodes Waterside in the regional retail hierarchy and the opportunity for intensification of land use. Permit additional retail and permitted mixed use at Rhodes Waterside.</p>	<p>1. Refer to section B above.</p> <p>2. Refer to section B above.</p> <p>3. The night-time economy is an important function of local centres, but needs to be designed in a way that minimises noise conflicts. Action 9.5 of the LSPS relates to the preparation of an Evening Economy Strategy and Council would welcome the contribution of Rhodes and Birkenhead Point to achieving their aspirations for this area.</p> <p>4. Refer to section D above.</p> <p>5. Refer to section H above.</p>

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		<p>3. Encourage evening activity to bolster the night-time economies at Birkenhead Point and Rhodes Waterside.</p> <p>4. Do not preclude terraces and dual occupancies in lower density and character areas delivered under the Medium Density Code.</p> <p>5. "Character Areas" and "Terrace and dual occupancy potential" areas could challenge the ability to meet housing targets, particularly in close proximity to existing and future mass transit infrastructure.</p> <p>6. Incorporate build-to-rent as a specific typology.</p> <p>7. Objection to precluding higher density on certain sites with large, consolidated land holdings in low-density residential areas.</p> <p>8. Cumulative impact of applying contributions and requirements to deliver affordable housing, development contributions, increased Basix requirements, increased tree canopy requirements could negatively impact the affordability of housing in the LGA.</p> <p>9. Need to improve the local road network, including modal shift, active transport and public transport at Birkenhead Point and Rhodes Waterside.</p> <p>10. Reintroduce public ferry at Birkenhead Point.</p>	<p>6. 'Build to rent' is an emerging, although somewhat unproven, type of ownership model. It currently has unclear housing merits and it is not yet certain that associated housing costs are lower. It is not an established housing typology within the planning framework and cannot therefore be included in the LEP. There are however no planning impediments to the market delivering this typology.</p> <p>7. The LSPS does not explicitly preclude higher density development in low-density residential areas, although Action 5.2 of the LSPS is to ensure that development is consistent with Council's desired future character.</p> <p>It is recommended that this aim be further strengthened and the LSPS be amended to clarify that, outside of identified renewal areas, land use change will be limited and that development proposals will need to reflect the prevailing scale and density of the established built form in the locality and be supported by an evidence-base that is equivalent to at least that undertaken for this LSPS.</p> <p>8. The Sydney East District Plan requires metropolitan Councils to prepare Affordable Rental Housing Target Schemes to deliver housing that meets the needs of households on moderate, low and very low incomes, as identified in Council's Local Housing Strategies. The Sydney East District Plan also requires Councils to contribute towards a tree canopy target of 40% for Sydney. Under the NSW Government Architect's Draft</p>

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			<p>Urban Office Tree Canopy Guide this target is reduced to 25% minimum by the year 2036 for medium to high-density residential and light commercial areas.</p> <p>9. Refer to section I above.</p> <p>10. Future Transport 2056 includes commitment to Ferry Fleet Replacement Program, including upgraded services on Parramatta River ferries, in 0-10 years.</p>
49	Mortlake and Majors Bay Resident Action Group (MMBRAG)	1. Community access to RMS (Waterways Authority) site in Hilly Street Mortlake, public waterfront access in any future development of the adjacent Jemena site and public foreshore access between Majors Bay Park and Bertram Street need to be secured.	1. Council is currently undertaking a review of foreshore access to investigate ways to increase community access to the foreshore. This work is progressing separately to the LSPS work and will be implemented as part of Council's annual budgetary processes.
50	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
51	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
52	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
53	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
54	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
55	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
56	NSW Aboriginal Land Council (NSWALC)	1. NSWALC encourages use of DPIE's example LSPS goals and actions to promote tourism, enhance economic self-determination of Aboriginal communities through their land holdings, and protect and celebrate Aboriginal culture and heritage.	1. Action 1.7 of the LSPS will be amended to include "where appropriate, support Aboriginal self-determination, economic participation and cultural expression."
57	NSW Office of Sport	1. The agency is currently working to develop District Sport Facility Plans, to provide a strong foundation for future facility provision and participation in sport and active recreation. Recommend the LSPS	1. Refer to section K above.

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		<p>include in Priority 17 to support the implementation of the District Sport Facility Plans (once released).</p> <p>Amend draft Social Infrastructure (Open Space and Recreation) Strategy to improve readability, clarity and understanding including opportunity to explore shared use of courts for various codes and consider equitable access between male and female participants in allocation policies.</p>	
58	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
59	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
60	Individual	1. Uncertainty about redevelopment of North Strathfield for the Metro and R2 zone would be resolved by rezoning to higher density.	1. Refer to section A and J above.
61	Piety THP	<p>1. Clarification and consideration is needed for North Strathfield area in proximity to existing stations, including PRCUTS and Concord West Precinct Plan.</p> <p>2. Strategic response is needed for integration of Metro with surrounding land uses, including commitment to a detailed urban change study of opportunities and impacts, government consultation and collaboration, and public consultation.</p> <p>3. Terrace and dual occupancy potential area should be removed from structure plan, to reflect a more balanced and realistic potential for the area, which is not reflected in the LHS.</p>	<p>1. Refer to section A above.</p> <p>2. Refer to section J above.</p> <p>3. Refer to section D above.</p>
62	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
63	Prolet	<p>1. There is a need and importance to deliver public infrastructure at Rhodes East planned precinct up-front.</p> <p>2. Sustainability initiative in the LSPS should be reviewed to replace mandated water recycling and private electricity, with performance targets.</p>	1. The draft Rhodes Revised Precinct Plan proposes a Master Planning process that will determine the capacity of the precinct to accommodate additional dwellings. The State Government will then determine the type and amount of contributions developers will

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			<p>make towards infrastructure in the precinct.</p> <p>Refer to section C above.</p> <p>2. Refer to section L above.</p>
64	Property Owners Association of NSW	1. Refer to Proforma number 2	1. Refer to section E above.
65	Individual	1. LSPS is supported, as will transform Five Dock into a thriving metropolitan inner city suburb.	1. Refer to section B above.
66	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
67	Shelter NSW	<p>1. Need to identify opportunities for delivery of AH financed through planning mechanisms such as SEPP 70/Affordable Housing; Contribution Schemes; Voluntary Planning Agreements; Section 7.11. It is also extremely unlikely to improve housing affordability for very low and low income households. 5% AH requirement should be expanded to include whole LGA and increased to 10-15%.</p> <p>2. Boarding house land size requirement would limit financial viability of boarding houses in low density areas.</p> <p>3. Concerned about housing diversity areas and apartment mix as this could potentially prevent Council from delivering medium density. Development should be distributed across the LGA. Need to elaborate on how Council will deliver more housing growth and housing diversity in low rise medium density areas if Complying Development under Housing Code is precluded from Local Character Areas.</p> <p>4. Various recommendations for adaptable and accessible apartments to achieve levels under Liveable Housing Design Guidelines from Liveable Housing Australia. Priorities 6 and 17 should include references to the universal design and accessibility.</p>	<p>1. Noted. Council intends to prepare an Affordable Housing Contribution Scheme to address the needs for affordable housing in the City of Canada Bay.</p> <p>Refer to section E above.</p> <p>2. The LSPS aims to facilitate boarding houses in areas with good access to public transport and services, and to ensure consistency with local character and adequate amenity for existing and new residents.</p> <p>3. Refer to section D above.</p> <p>4. The LSPS aims to deliver a proportion of all new apartment development as adjustable and accessible. The Liveable Housing Design Guidelines can be considered as part of Council's review of the Development Control Plan.</p>

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68	Sydney Local Health District (SLHD)	<ol style="list-style-type: none"> 1. Concord Hospital and Rhodes would ideally be considered together as a Health and Education Collaboration Area. 2. 5% affordable housing in Rhodes Planned Precinct is low and should be increased to facilitate a local base of key workers, such as nursing and hospital staff. 3. Action 1.3 should include medium and high density / low rise building forms. 4. Action 1.5 and Measure should read 'Sydney Local Health District (SLHD)'. 5. Query terminology 'low-scale.' 6. Include SLHD <i>Building Better Health</i> in References. 7. LSPS should acknowledge chronic diseases and economic benefits from physical activity. 8. NSW Cancer Council notes that Australia has the highest rate of melanoma in the world. Good-quality shade can reduce UV exposure by up to 75%. <i>Guidelines to Shade</i> promotes both natural and built shade in the public domain, public infrastructure and private development. Recommend text to be included in LSPS. 9. NSW Cancer Council notes that NSW Department of Planning's Example LSPS does not include themes that relate directly to the design of healthy built environments. 	<ol style="list-style-type: none"> 1. Noted, however the collaboration areas were included in the Eastern City District Plan and this location was not identified as a health and education Collaboration area. 2. Refer to section E above. 3. Development in planned precincts is the responsibility of the NSW Government and is generally intended to deliver high density development. Council will continue to work with the State Government to facilitate density with a human scale and a diversity of building forms (Action 1.3). 4. It is recommended that the LSPS be amended to correct terminology. 5. Low-scale is a common planning term referring to low building height. 6. The LSPS will be amended to include reference to Building Better Health. 7. It is recommended that Priority 4 be amended to reference chronic diseases, but economic benefits are indirect and should therefore not be referenced in the LSPS. 8. It is recommended that Action 4.1 of the LSPS be amended to include "regard for Cancer Council NSW Guidelines to Shade in land use plans for the public domain and new public infrastructure." 9. Noted.
69	St Vincent de Paul	<ol style="list-style-type: none"> 1. Affordable housing requirement should be increased from 5% to 10-15% and applied to entire development, not just uplift. 	<ol style="list-style-type: none"> 1. Refer to section E above.
70	Sydney Water	<ol style="list-style-type: none"> 1. Amend Action 13.5 to state "Complete naturalisation for Massey 	<ol style="list-style-type: none"> 1. Refer to section L above.

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		<p>park, Dobroyd/Iron Cove, St Lukes Park Channel and Powells Creek.”</p> <ol style="list-style-type: none"> 2. Amend Actions 19.1 and 19.2 to develop flood studies that incorporate climate change for all waterways in the LGA. 3. Extend the open space corridor to the M4 and the habitat corridor to the Mason Park Wetland. 4. Recommend developing controls to require inclusion of recycled water schemes in new developments. 	<ol style="list-style-type: none"> 2. The flood studies will incorporate possible impacts of climate change. 3. Council can work with Sydney Water to consider implications arising from this proposal, which would include land acquisition. 4. Refer to section L above.
71	Transport for NSW (TfNSW)	<ol style="list-style-type: none"> 1. Make various minor text corrections and mapping amendments. 2. Ensure that zoning around North Strathfield is aligned with planning for the Metro station precinct. Amend Priority 11 to add Bakehouse Quarter, as North Strathfield will be the only interchange point between T1 Northern Line and Sydney Metro West. 3. Restrict parking around Metro Stations. 4. Encourage all developments and major land owners to implement, measure and report on Travel Demand Management measures, including for development at Rhodes, to help achieve net-zero greenhouse gas emissions. 5. New high density developments in local centres and precincts need to provide adequate off-street loading facilities to not create additional congestion. 6. Amend Action 4.1 to discourage ribbon/linear sprawl development along classified roads that don't have good public transport. 7. Support urban form that encourages walking and cycling. 8. Action 5.1 should note that allocating additional road space planning land for the expected movement and place functions along the Patterson Street, Gipps Street, Queens Road, Fairlight Street, Ramsay Road and Ramsay 	<ol style="list-style-type: none"> 1. LSPS to be amended. 2. Refer to section J above. 3. It is recommended that the LSPS be amended to minimise parking close to Metro West stations. 4. It is recommended that the LSPS be amended to require new development in Rhodes Planned Precinct to support Travel Demand Management (TDM) measures. Proposed future climate change study will aspire to achieve net-zero emissions by 2050. 5. It is recommended that the LSPS be amended to require off-street loading facilities in new commercial and medium/high density residential developments, and at Rhodes and Birkenhead Point. 6. Residential development will be concentrated in Planned Precincts and low-density housing typologies will be investigated in the vicinity of local centres that have access to good public transport. 7. Refer to section I above. 8. Consideration of traffic and transport impacts of PRCUTS also includes 'movement and

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		<p>Street corridor is integral to the PRCUTS.</p> <p>9. Amend Action 9.2 to remove delivery of bulky goods on Parramatta Road, as will negatively impact the performance of classified roads, particularly when they have a direct vehicular access to a classified road; encourage vehicular access for Large Bulky Goods Retail onto local streets; are incompatible land use with the local centre vision for the Kings Bay Precinct.</p> <p>10. Sydney Metro West has proposed stations at North Strathfield, Burwood North and Five Dock. Planning and design work is currently being undertaken to determine station locations and preferred alignment.</p> <p>11. Unclear how Implementation, Monitoring and Reporting measures demonstrate priorities are being achieved. Timing needs to be clarified.</p> <p>12. Movement and Place classification depicted in the Draft Local Movement Strategy should be consistent with TfNSW's findings particularly for the State classified roads.</p> <p>13. Consider how TfNSW land (including at railway stations and non-operational sites) could be utilised to support placemaking outcomes, enhance transport outcomes and meet local housing needs.</p> <p>14. Unclear how freight precincts (e.g. shopping precincts and industrial areas) will be protected to provide out of hours access for deliveries and operations on key freight routes.</p> <p>15. Amend Action 8.3 to include cumulative impacts from Rhodes East Precinct uplift.</p> <p>16. Include additional references: Parramatta Road Corridor Urban Transformation Strategy; Sydney CBD to Parramatta Strategic Transport Plan.</p>	<p>place' functions on other local and side roads in the corridor.</p> <p>9. Consideration will be given to the submission from TfNSW when draft plans are prepared for the Parramatta Road corridor.</p> <p>Refer to section G above.</p> <p>10. Noted.</p> <p>11. It is recommended that the LSPS be amended to clarify timing and that, where Council is not the responsible delivery authority, the timing and delivery will be at the discretion of other Government agencies.</p> <p>12. The classifications in the Strategy are aspirational and aim to achieve best place-planning outcomes.</p> <p>13. Council will work with TfNSW to deliver benefits on relevant land parcels.</p> <p>14. Freight management and protection of out of hours access for deliveries and operations will be considered in studies to be undertaken for local centres.</p> <p>15. It is recommended that Action 8.3 be amended to include "cumulative impacts from Rhodes Planned Precinct development."</p> <p>16. The LSPS will be amended to include these additional sources.</p>

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72	Individual	1. LSPS does not account for Metro at North Strathfield or PRCUTS BSH precinct. Terrace/duplex housing is suitable to transition areas and not suitable for North Strathfield.	1. Refer to section A and J above.
73	UDIA	<p>1. LSPS needs to include further evidence and justification to support proposed housing supply and to set clear targets in the LSPS.</p> <p>2. The requirement for planning proposals to address character and prevailing density precludes additional planning proposals. Preclusion of complying development for the Local Character Areas should be reviewed.</p> <p>3. Council should advocate for an urban development program as an action in the LSPS.</p> <p>4. Affordable housing should be based on an incentive-based approach in collaboration with industry.</p> <p>5. PRCUTS should be prioritised.</p> <p>6. Council should collaborate closely with industry to create controls to create mixed-use precincts.</p>	<p>1. Refer to section F above.</p> <p>2. Refer to section H above.</p> <p>3. Council is required to review the LHS every 5 years. The review will capture major residential redevelopment projects in the pipeline. This is sufficient to monitor major development, which generally have a long approval timescale.</p> <p>4. Council is preparing an Affordable Housing Contribution Scheme consistent with NSW Government policy and SEPP 70 – Affordable Housing Revised Schemes. Refer to section E above.</p> <p>5. Noted. Council is awaiting inputs from the NSW Government before detailed design work on this project can continue.</p> <p>6. Refer to section B and C above.</p>
74	Individual	1. Refer to Proforma number 2	1. Refer to section E above.
75	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
76	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
77	Woolworths	<p>1. Local centres need to accommodate mixed-use development. More residential development in Five Dock Town centre is requested.</p> <p>2. Question the focus on Drummoyne town centre as rationale for restriction on supermarket GFA at Birkenhead Point, with Birkenhead Point being a metropolitan shopping destination, with 7,200 sqm of additional main street/box retail floor space likely to be supportable at Drummoyne/Birkenhead Point by 2036.</p>	<p>1. Refer to section B above.</p> <p>2. Council is currently investigating the potential to develop the public domain at Drummoyne to enhance its role as a local centre. This may include facilitation of a new supermarket in Drummoyne. Council's draft Employment and Development Strategy found there is additional demand for supermarket floor space in the local vicinity that could be used</p>

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		<p>3. Delete requirement for above ground commercial in Five Dock and around Metro until the study of commercial uses is complete. Review of Part F – Mixed Use Areas and Neighbourhood Centres of the Canada Bay DCP 2017 (specifically Section F2.2 Five Dock Town Centre) is needed.</p> <p>4. Include an “innovation in retail” provision in the LEP to give Council discretion to assess and approve a use that may be ‘undefined’ but which is aligned to the retail planning objectives of a particular location. Need to support and nurture new retail formats, in recognition of the rise in e-commerce and convenience retailing.</p>	<p>to anchor a town centre vision for Drummoyne.</p> <p>3. Council intends to develop studies to determine how retail and commercial floor space is best accommodated before any land use changes are made adjoining or adjacent to the centres of Five Dock, Majors Bay Road (Concord), Concord West or North Strathfield, to ensure Council’s strategic aims for local centres not locked out by incremental changes of commercial use.</p> <p>4. Council’s Employment and Productivity Strategy mentions trends in the different ways people are engaging with retail. Council will further explore flexibility in planning controls to accommodate changing business needs and support innovation in retail as part of Council’s future Local Centre Place Plans. These will need to ensure that “innovation in retail” does not simply expand traditional retail away from centres and reinforce car-based access.</p>
78	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
79	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.
80	Yuhu Group	<p>1. Dedicated rapid public transport along the Parramatta Road Corridor is supported.</p> <p>2. Implementation of PRCUTS for the Bakehouse Quarter is supported. B4 Mixed Use zoning and densities nominated for the Bakehouse Quarter in the PRCUTS is supported. Concerned that draft Employment & Productivity Strategy recommend the Bakehouse Quarter remain the current B3, as contrary to UrbanGrowth recommendations.</p>	<p>1. Noted.</p> <p>2. Refer to section B above.</p>

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		3. Bakehouse Quarter should be included as a Local Centre in the LSPS, as it is in the BSH precinct.	
81	Individual	1. Refer to Proforma number 1 - North Strathfield Residents Group	1. Refer to section A and J above.