

Item No: C10/23-404

PLANNING PROPOSAL - 25 SOUTH PARADE, AUBURN

Directorate: Environment and Planning
Responsible Officer: Director Environment & Planning
Community Strategic Plan Goal: *Enhancing the Natural and Built Environment*

SUMMARY

Council has received a planning proposal for 25 South Parade, Auburn, to amend Schedule 1 of Cumberland LEP 2021 to permit office premises and a medical centre as additional permitted uses (APUs) on the site, and to introduce a maximum building height of 11m on the site for these uses. The Proponent is also willing to consider entering into a Planning Agreement with Council for the provision of public benefit.

The proposal was placed on early consultation and reported to the Cumberland Local Planning Panel in September 2023. The Panel supported the Council officer recommendation to proceed to a Gateway Determination, as outlined in this report.

It is recommended that Council endorse the planning proposal and that this be forwarded to the Department of Planning and Environment for a Gateway Determination. It is also recommended that Council endorse that a Voluntary Planning Agreement be prepared to derive public benefit, should a Gateway Determination be received.

RECOMMENDATION

That Council:

- 1. Endorse a planning proposal for 25 South Parade, Auburn, to amend the Cumberland Local Environmental Plan 2021 with a local provision for the proposal as follows:**
 - a. Identify medical centre and office premises as additional permitted uses on the site.**
 - b. Allow for the Height of Building control to be 11 metres for these additional permitted uses.**
- 2. Endorse that the planning proposal be prepared and forwarded to the Department of Planning and Environment for a Gateway Determination.**
- 3. Note that, subject to the receipt of a Gateway Determination by the Department of Planning and Environment, the planning proposal for 25 South Parade, Auburn, will be exhibited.**
- 4. Endorse that a Voluntary Planning Agreement be prepared to derive public benefit, should a Gateway Determination be received.**

REPORT

Background

In June 2022, the Proponent lodged an initial Planning Proposal Request for the site, seeking additional permitted uses for the purposes of health services facilities, office and business premises, and for a maximum height of 9m for these additional uses.

In August 2023, the Proponent lodged a revised Planning Proposal Request for the site, seeking additional permitted uses for the purposes of medical centre and office premises, and for a maximum height of 11m for these additional uses.

The status of the Planning Proposal Request is shown in Figure 1.



Figure 1: Status of the Planning Proposal

Subject Site and Context

The Planning Proposal Request relates to 25 South Parade, Auburn, which is located approximately 200m from the Auburn Town Centre, and approximately 4km from the Parramatta CBD.

The following consents have been issued by Council:

- DA2000/249 - construction of an office building and associated car parking area.
- DA2021/0104 - alterations to existing commercial building including installation of lift relocation of internal stairs and construction of a new fire stair.

The site currently consists of an office building, occupied by 'Western Sydney Eye Doctors' ophthalmology clinic, with car parking spaces on the remainder of the site (Figure 3).

Surrounding land uses include:

- To the north and east – established residential neighbourhoods, dominated by 1-2 storey detached dwellings.
- To the south – St John's Primary Catholic School, residential apartment buildings.
- To the south-east – Auburn Railway Station and Auburn Town Centre.

- The west – Residential apartment buildings.

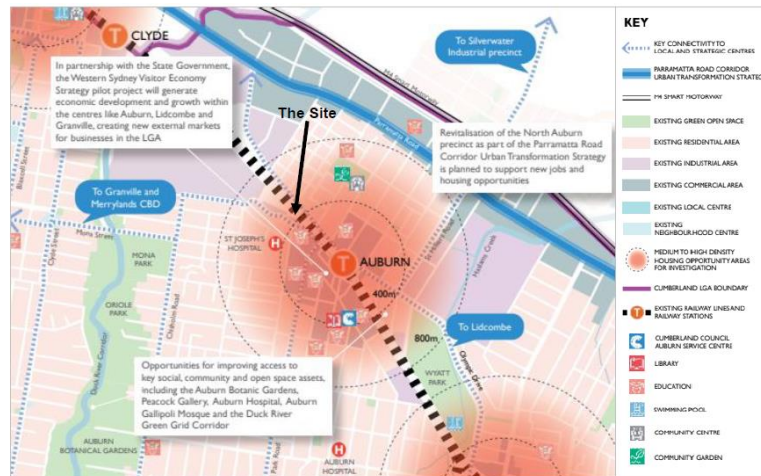


Figure 2: The site in its regional context



Figure 3: The site in its local context

Objectives and Intended Outcomes

The Planning Proposal Request seeks to amend Schedule 1 of Cumberland LEP 2021 to permit office premises and a medical centre as additional permitted uses (APUs) on the site. It is intended that the site be redeveloped to facilitate a medical centre and office uses, and to introduce a maximum building height of 11m on the site for these uses.

Explanation of Provisions

To achieve the objectives and intended outcomes, the proposal seeks to amend Cumberland LEP 2021 as summarised in Table 1 below and shown in Figures 4 to 10.

Control	Existing	Proposed
<i>Land Zone</i>	E4 General Industrial	No Change
<i>Height of Buildings</i>	Nil	11m
<i>Floor Space Ratio</i>	1:1	No Change
<i>Minimum Lot Size</i>	1500 m ²	No Change
<i>Additional Permitted Use</i>	Nil	Medical Centre Office Premises

Table 1: Proposed amendments to Cumberland LEP 2021



Figure 4: Existing Land Zoning (No change)



Figure 5: Existing Height of Buildings Map



Figure 6: Proposed Height of Buildings Map



Figure 7: Existing Floor Space Ratio (No change)



Figure 8: Existing Lot Size Map (No change)



Figure 9: Existing Additional Permitted Uses Map



Figure 10: Proposed Additional Permitted Uses Map

Public Benefit Offer

Through the application of the Cumberland Planning Agreements Policy and Guideline, Council seeks to ensure a fair and reasonable apportionment of the costs and benefits of development and deliver planning outcomes that contribute to a net public benefit for the community.

The Proponent is willing to consider entering into a Voluntary Planning Agreement (VPA) with Council under Section 7.4 of the Environmental Planning and Assessment Act 1979 (EPA Act).

Should the proposal proceed to a Council meeting and Gateway, Council is likely to enter into a Voluntary Planning Agreement and have further discussions with the proponent in the future.

Early Consultation

Council officers placed the Planning Proposal Request on preliminary consultation from 23 September 2022 to 17 October 2022, in accordance with policy requirements.

Public Submissions

Council received no submissions during this exhibition period.

State Agencies

Relevant State agencies were invited to provide comment on the proposal. Items covered in the submissions are outlined in Table 2.

Agency	Comments
Transport for NSW	Proposal will require consultation with Sydney Trains early in the design process (as part of pre-DA discussion). Consideration for how the future development site will be serviced. Requirement for adequate setbacks from Sydney Trains powerlines. Concerns for the impact of train noise and vibration on future health services facilities
Environmental Protection Agency (EPA)	No major concerns or objections raised.
Heritage NSW	No identified impacts on aboriginal objects or places and state listed items. Potential impact on locally listed item, Clyde Marshalling Yards. (It is noted by Council officers that the existing heritage curtilage of this item is proposed to be modified under the Cumberland Heritage Planning Proposal, which is currently in post-Gateway exhibition).

Table 2: State Agencies Comment

Liaison with the Proponent

The Proponent attended a pre-lodgement meeting on 23 February 2022, before the Planning Proposal Request was lodged with Council. Advice provided by Council officers at the pre-lodgement meeting was to consider the suitability of the proposed new uses in the context of:

- The E4 General Industrial zone objectives (formerly IN1 General Industrial)
- The Greater Sydney Commission's 'retain and manage' policy position for industrial lands.
- The location of the site – with respect to pedestrian and vehicular access.

The initial Planning Proposal Request was submitted by the Proponent in June 2022, seeking additional permitted uses for health service facilities, office and business premises. This proposal was placed on preliminary consultation in September and October 2022.

Following a further review by Council officers of the proposal, Council officers provided feedback to the Proponent in March 2023 on their initial Planning Proposal Request, outlining various concerns and requesting additional information to allow for the proposal to be fully considered. Based on this feedback, further discussions were held with the Proponent, Council officers and the Department of Planning and Environment.

In response to this feedback and further discussions, the Proponent submitted a revised Planning Proposal Request in August 2023. The revised proposal seeks to amend Schedule 1 of Cumberland LEP 2021 to permit the specific land uses of office premises and medical centre as additional permitted uses (APUs) on the site, and to introduce a maximum building height of 11m on the site for these uses.

Strategic Merit Assessment

As the Planning Proposal Request seeks to permit additional land uses on industrial zoned land, a key strategic consideration has been ensuring that the proposal is not inconsistent with the strategic planning framework and policy context. The following context is provided in relation to the framework and the site:

- Industrial lands in Cumberland LGA are identified as 'review and manage' under the Greater Sydney Region Plan and Central City District Plan (Figures 11 and 12). This approach allows for consideration of alternate uses where land is located adjacent to town centres. The site of this planning proposal is located adjacent to the Auburn Town Centre.
- The Cumberland Employment and Innovation Lands Strategy and Study includes the site as part of the strategic framework (Figure 13) for employment lands in the Cumberland LGA. As part of this work, the following considerations are identified that are not inconsistent with the planning outcomes sought for the site under the planning proposal:

- The site is located within the Services and Innovation Precinct. The strategic focus of this precinct is to maintain support service capability and encourage new service, research and innovation activities. At the time of adoption of the Strategy in 2019, much of the land in this precinct was not being used. Since this time, significant development is underway on the precinct in alignment with the Strategy and Study. Outside of the railway land in the precinct, there are only two small residual sites not part of this development. One site is the Manildra operation on 1 The Crescent, Auburn. The other site is 25 South Parade, Auburn, which is the subject of this planning proposal. The proposed additional land uses for the site would not impact on the strategic focus identified for the precinct and not preclude the significant development underway for other parts of the precinct.
- The Strategy and Study identifies allied health as a target industry sector. This sector includes a range of jobs, including optometrists and orthoptists, medical practitioners and general practice. These jobs are covered under the medical centre land use proposed to be included as part of the planning proposal.
- The site has historically been uses for office purposes and is currently used for office and medical related purposes. The proposed additional land uses identified in the revised planning proposal reflect these activities on the site, and does not seek to increase the range of activities defined under the ‘parent’ categorisation of these land uses.

Based on this information, it is considered that the intent of the revised planning proposal is not inconsistent with the strategic planning framework and policy context, and can be further considered by Council.

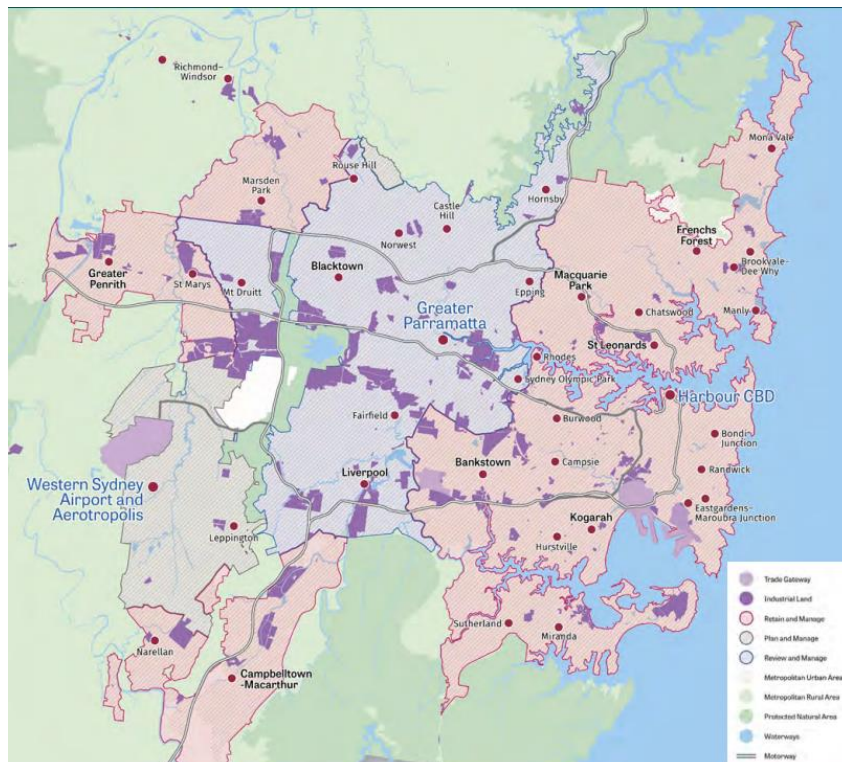


Figure 11: Review and Manage Framework for Industrial Land in Greater Sydney

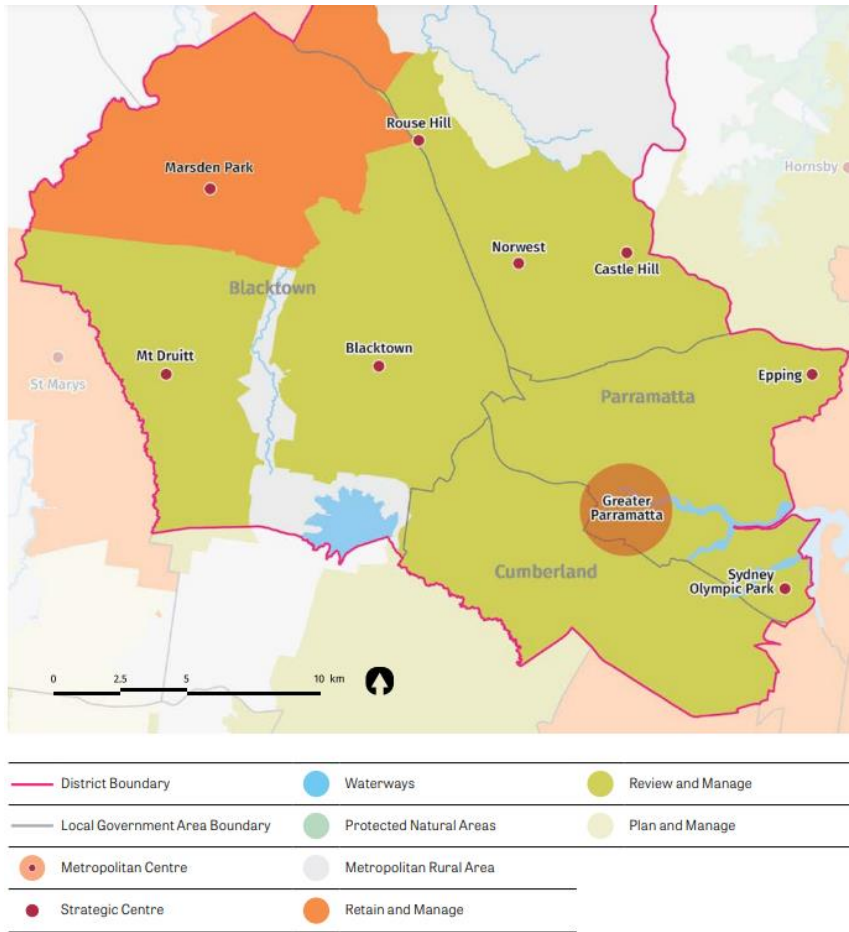


Figure 12: Review and Manage Framework for Industrial Land in Central City District

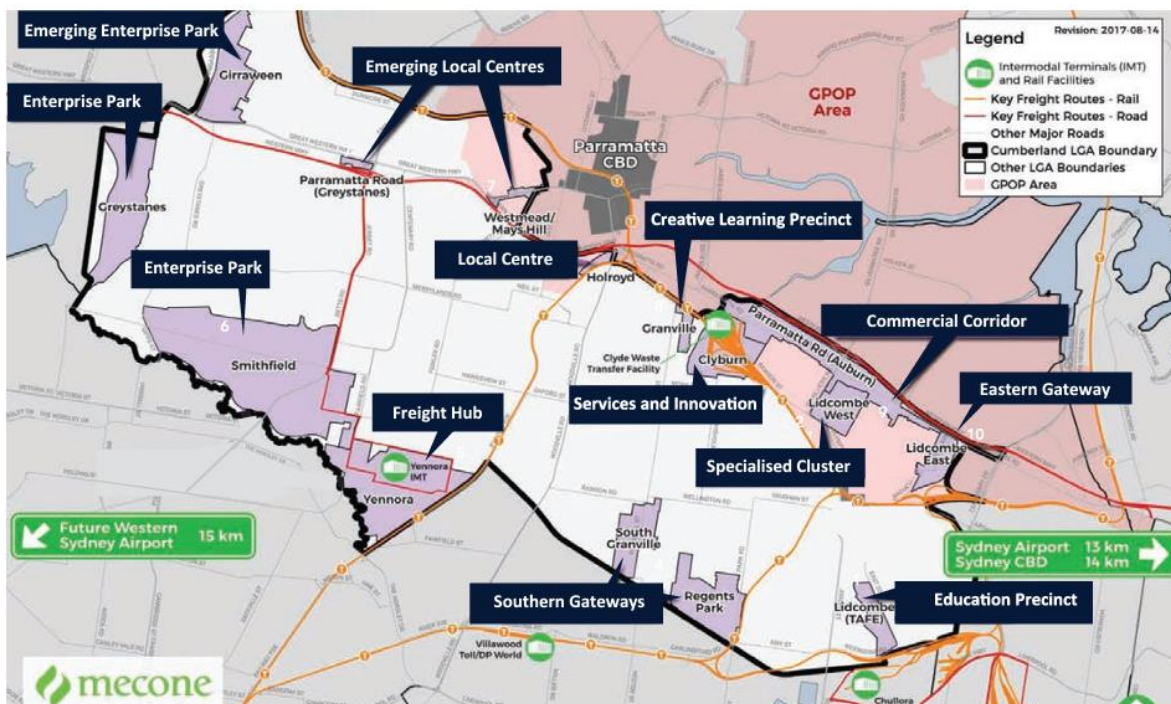


Figure 13: Cumberland Employment and Innovation Lands Strategic Framework

Further to the information provided above, the proposal is consistent with the strategic planning framework and policy context, as outlined below.

Consistency with Greater Sydney Region Plan - A Metropolis of Three Cities

	Consistency	Comment
Objective 1. Infrastructure supports the three cities	Yes	The local level detail that sets out how to achieve the Regional Plan is within the Cumberland Employment Innovation Strategy and Study
Objective 4. Infrastructure use is optimised	Yes	The proposal can progress with the use of existing infrastructure
Objective 6. Services and infrastructure meet communities' changing needs	Yes	The proposal provides services and employment in close proximity to residential land and public transport
Objective 14. A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities	Yes	The proposal provides services and employment in close proximity to residential land and public transport
Objective 16. Freight and logistics network is competitive and efficient	Not inconsistent	The proposal does not impact on the freight and logistics network
Objective 21. Internationally competitive health, education, research, and innovation precincts	Yes	The proposal supports health related uses on employment and innovation lands
Objective 22. Investment and business activity in centres	Yes	The proposal supports investment and business activity close to the Auburn Town Centre
Objective 23. Industrial and urban services land is planned, retained, and managed	Yes	The proposal does not impact on the planning framework for industrial and urban services land
Objective 24. Economic sectors are targeted for success	Yes	The proposal provides for land uses that align with target industry sectors in the Cumberland Employment and Innovation Lands Strategy

Consistency with the Central City District Plan

	Consistency	Comment
Planning Priority C1 Planning for a city supported by infrastructure	Yes	The local level detail that sets out how to achieve the District Plan is within the Cumberland Employment Innovation Strategy and Study
Planning Priority C3 Providing services and social infrastructure to meet people's changing needs	Yes	The proposal provides services and employment in close proximity to residential land and public transport
Planning Priority C7 Growing a stronger and more competitive Greater Parramatta	Yes	The proposal supports the needs of Greater Parramatta
Planning Priority C9 Delivering integrated land use and transport planning and a 30-minute city	Yes	The proposal provides services and employment in close proximity to residential land and public transport
Planning Priority C10 Growing investment, business opportunities and jobs in strategic centres	Yes	The proposal supports investment and business activity close to the Auburn Town Centre
Planning Priority C11 Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services land	Yes	The proposal supports health related uses on employment and innovation lands
Planning Priority C12 Supporting growth of targeted industry sectors	Yes	The proposal provides for land uses that align with target industry sectors in the Cumberland Employment and Innovation Lands Strategy

Consistency with Cumberland 2030: Our Local Strategic Planning Statement (LSPS)

	Consistency	Comment
Planning Priority 3: Aligning local infrastructure delivery with planned growth	Yes	The proposal provides services and employment in close proximity to residential land and public transport
Planning Priority 10: Supporting a strong and diverse local economy across town centres and employment hubs	Yes	The proposal supports investment and business activity close to the Auburn Town Centre

Planning Priority 11: Promoting access to local jobs, education opportunities and care services	Yes	The proposal provides services and employment in close proximity to residential land and public transport
Planning Priority 12: Facilitating the evolution of employment and innovation lands to meet future needs	Yes	The proposal provides for land uses that align with target industry sectors in the Cumberland Employment and Innovation Lands Strategy

Consistency with the Cumberland Employment and Innovation Lands Strategy and Study

	Consistency	Comment
Elevating the strategic importance of Cumberland's employment and innovation lands within the context of strategic planning for Greater Sydney and the Central City District and identify their role and function	Not inconsistent	The proposal will provide for additional employment generating land uses in proximity to the Auburn town centre and established residential areas
Recognising the importance of the freight network in supporting the ongoing viability of employment and innovation lands to ensure the major freight routes and facilities are not unnecessarily constrained by residential growth in the vicinity	Not inconsistent	The proposed use of the site will not impede the operation or importance of the freight network in the area
Seeking new ways of facilitating the growth of innovative businesses through the use of planning mechanisms and policies	Yes	The proposal will enable the site to provide additional employment generating land uses that provide services and facilities that cater to the existing and future needs of workers and residents in the area
Ensuring the land use planning framework for employment and innovation lands promotes innovation and target industries	Yes	The proposal will allow for the co-location of a medical centre in close proximity to existing health services in the area
Promoting the health of employment and innovation lands in response to population growth, land use change and infrastructure provision	Yes	The proposal will facilitate uses that provide employment opportunities in proximity to the Auburn town centre and residential areas

Site Specific Considerations

A range of site specific considerations have also been considered for the planning proposal. Further details of these considerations are outlined below.

Urban Design and Built Form

An Urban Design and Massing Study has been prepared in support of the proposal, which undertakes an assessment of the urban design impacts of the proposal and potential massing scenarios to inform the best fit maximum building height for the site, based on the relevant provisions of the Cumberland LEP and DCP applying to the site.

It is proposed that any development on the site be in keeping with the height and bulk of the majority of existing and potential future developments on surrounding sites. It is noted that the current height control on the residential area to the southwest is 9 metres and that the existing medium density residential development immediately west of the site surpasses this by around two metres.

Two massing scenarios were examined as part of the study – 9 metre height and 11 metre height. The analysis of the scenarios found that the height control of 11 metres produces a building envelope with significantly superior architectural outcomes in terms of daylighting and natural ventilation, occupant experience, sustainability, constructability and civil engineering impacts. The 11 metre massing scenario site plan and elevation is shown in Figure 14.

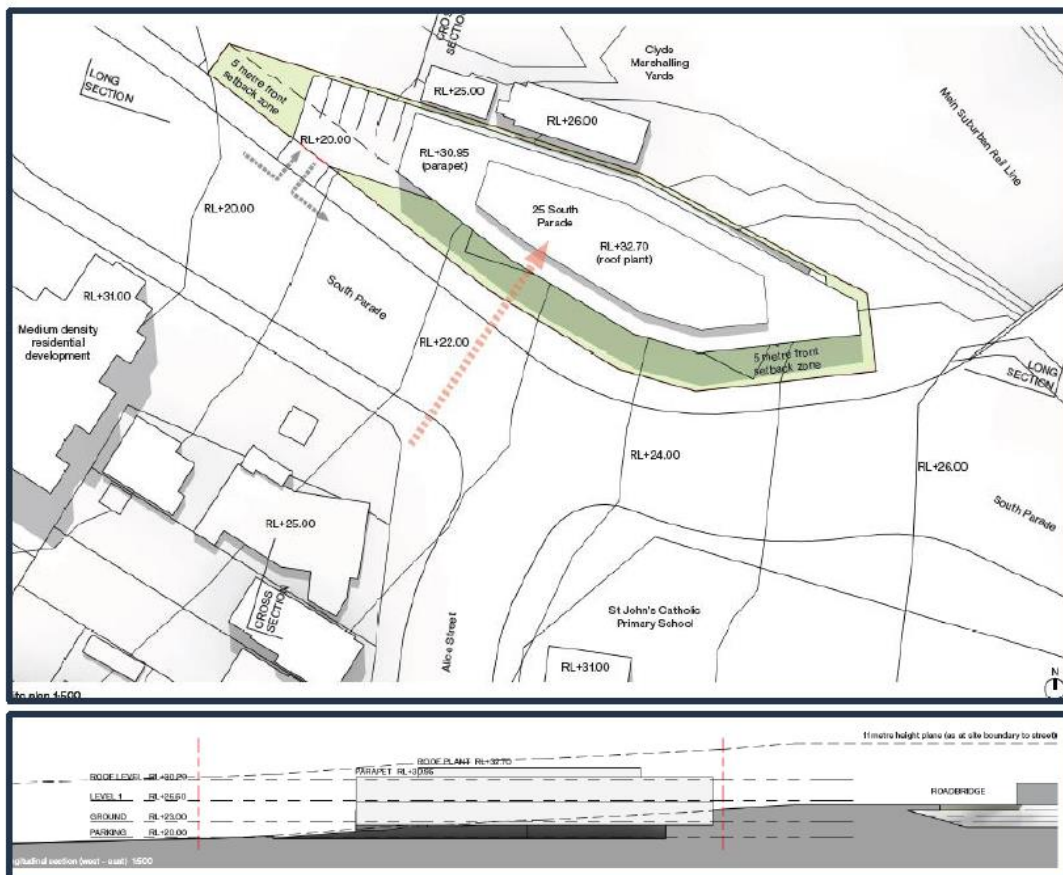


Figure 14: 11 Metre Massing Scenario Site Plan and Elevation

The massing scenarios demonstrate that the proposed additional uses of medical centre and office premises may be accommodated on the site to the full floor space allowance in the Cumberland LEP, and in compliance with existing Cumberland LEP and DCP controls. Despite challenges accommodating the minimum car parking requirements of the Cumberland DCP for the proposed additional uses within the site's narrow, tapering geometry, a satisfactory urban design outcome can be achieved by providing deep soil soft landscaping above the minimum required by the Cumberland DCP within the front setback zone.

As a result, the proposal seeks to amend the Cumberland LEP to include a maximum building height control of 11 metres for the proposed additional permitted uses on the site.

Traffic and Access

A Traffic and Parking Assessment has been prepared in support of the proposal. The assessment includes a review of the following:

- Background and existing traffic and parking conditions of the site
- Assessment of the public transport network within the vicinity of the site
- Adequacy of car, bicycle and motorcycle parking provision
- Projected traffic generation of the proposed use of the site
- Transport impact of the proposed use of the site on the surrounding road network

In regard to pedestrian access, there are no existing pedestrian crossings on South Parade at the signalised intersection of South Parade and Alice Street directly outside of the subject site. In order to provide pedestrian safety and to encourage public transport use associated with the proposed future uses of the site, it is recommended that a pedestrian crossing on the western approach of South Parade is provided. This can be further considered at the development application stage should the proposal proceed to Gateway and finalisation.

In regard to traffic, an assessment was undertaken for the nearby intersections and road network. The assessment concluded that the existing intersections and surrounding road network in proximity to the site are currently operating at a good condition and has sufficient capacity to accommodate additional traffic associated with the proposed future uses onsite.

In regard to parking, an assessment was undertaken on current and future requirements. The site currently has 22 at grade car parking spaces. Based on the proposed future uses and the existing floor space of the building, the car parking requirements of the Cumberland DCP can be met. This can be further considered at the development application stage should the proposal proceed to Gateway and finalisation.

Acoustics

An Acoustics Assessment has been prepared in support of the proposal. The assessment concludes that the proposal does not present an issue from an acoustics perspective and is likely to improve acoustic amenity for neighbouring land uses. This includes the following considerations:

- Commercial buildings of this nature have substantially less potential for noise breakout compared to an industrial facility. Commercial activities associated with office and medical centres and their associated noise are typically well contained within the building's external envelope.
- Office premises will typically have more limited hours of operation and the building would rarely be used during early morning hours. This eliminates a major source of potential noise complaints, being early morning noise generation.
- The subject site is located on a major railway corridor and main road. Due to the more stringent internal noise criteria associated with external noise intrusion for commercial spaces as opposed to industrial, the building may require additional noise attenuation measures. This can be further considered at the development application stage should the proposal proceed to Gateway and finalisation.

Heritage

The site is in close proximity to the existing heritage item for the Clyde Marshalling Yards. Given this, a Heritage Assessment has been prepared. The assessment states that the proposal is restricted to the provision of new permitted uses under the current zoning on the site. No physical intervention, including sub-surface disruption, is proposed and concludes that the planning proposal is supportable from this perspective.

Environmental

The planning proposal seeks to facilitate the future use of the site for the purposes of office and medical centre uses. The future uses of the site will be located on an existing disturbed site and will not require the removal of any existing vegetation in the area and therefore will not have any adverse ecological impacts on the site or surrounding area.

Social

A Social Impact Comment has been prepared as part of the planning proposal. The analysis found that the proposal is likely to benefit both community cohesion and development by supporting local access to potential employment and services. In addition, the proposal is likely to have very limited impacts on ways of life in terms of noise and traffic.

Economic

An Economic Impact Assessment has been undertaken as part of the planning proposal. The assessment found that the proposal for office and medical centre uses will not result in any adverse economic impacts on the area or nearby Auburn town

centre and will facilitate the use of the site for purposes that recognise the highest and best use of the site. The proposal will also provide ancillary land uses that positively contribute to the Auburn town centre and existing health service facilities that are located in close proximity to the site.

Cumberland Local Planning Panel

The proposal was reported to the Cumberland Local Planning Panel on 13 September 2023, with a recommendation to Council that the proposal be endorsed and forwarded to the Department of Planning and Environment for a Gateway Determination. The Panel supported the recommendation of Council officers.

Next Steps

Following review of the planning proposal by Council officers and advice provided by the Cumberland Local Planning Panel, the planning proposal is provided for consideration by Council. It is recommended that Council endorse the planning proposal and that this be forwarded to the Department of Planning and Environment for a Gateway Determination. It is also recommended that Council endorse that a Voluntary Planning Agreement be prepared to derive public benefit, should a Gateway Determination be received.

Should Council support the proposal and a Gateway Determination is provided by the Department of Planning and Environment, the planning proposal will be exhibited. A further report will then be provided to Council.

COMMUNITY ENGAGEMENT

Council officers have carried out early consultation on the proposal, as outlined in this report. Further statutory consultation will be carried out by Council officers if the proposal proceeds past Gateway.

POLICY IMPLICATIONS

Policy implications are outlined in the main body of this report.

RISK IMPLICATIONS

There are no risk implications for Council associated with this report.

FINANCIAL IMPLICATIONS

Financial implications for Council are outlined in this report.

CONCLUSION

The planning proposal for 25 South Parade, Auburn, is consistent with the strategic planning framework and policy context and will provide a medical centre and office premises to meet the needs of the community. It is recommended that the planning proposal is endorsed, and that the planning proposal is forwarded to the Department of Planning and Environment for a Gateway Determination. It is also recommended

that a Voluntary Planning Agreement be prepared to derive public benefit, should a Gateway Determination be received.

ATTACHMENTS

1. Planning Proposal Request [↓](#)
2. Urban Design and Massing Study Report [↓](#)
3. Traffic and Parking Impact Assessment [↓](#)
4. Social Impact Comment [↓](#)
5. Economic Impact Assessment [↓](#)
6. Heritage Assessment [↓](#)
7. Preliminary Site Investigation [↓](#)
8. Acoustic Letter [↓](#)
9. Existing Site Plans [↓](#)
10. Preliminary Consultation Report [↓](#)
11. TfNSW Submission [↓](#)
12. EPA Submission [↓](#)
13. Letter of Offer [↓](#)
14. Cumberland Local Planning Panel Advice [↓](#)

**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 1
Planning Proposal Request**

Planning Proposal – 25 South Parade, Auburn

PLANNING PROPOSAL 25 SOUTH PARADE, AUBURN

August 2023

Prepared by *The Planning Hub*



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Appendices

A	Pre-Lodgement Consultation Response Compliance
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B	Existing Plans
	<i>RMJ Building Group</i>
C	Acoustic Letter
	<i>Koikas Acoustics</i>
D	Economic Impact Assessment
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E	Traffic and Parking Impact Assessment
	<i>ML Traffic</i>
F	Urban Design Study
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G	Social Impact Comment
	<i>Hill PDA</i>
H	Heritage Assessment
	<i>Touring the Past</i>
I	Preliminary Site Investigation
	<i>Dr Upsilon Environments Pty Ltd</i>

Planning Proposal – 25 South Parade, Auburn

Executive Summary

Overview

This Planning Proposal has been prepared on behalf of Dr. E Kehdi and seeks to amend the Cumberland Local Environmental Plan (LEP) 2021 to include additional permitted uses of medical centre, office premises and a maximum building height of 11m at 25 South Parade, Auburn.

The rationale for the planning proposal is to facilitate the future use of the site for the purposes of a medical centre and office premises that are consistent with development in the surrounding area and the surrounding context based on the site's proximity to the Auburn Town Centre.

The subject site is currently zoned E4 General Industrial under the provisions of the Cumberland LEP 2021. Medical centres and office premises are prohibited in the E4 General Industrial zone. The site is bound by the Main Suburban Railway to the north and represents a small portion of industrial zoned land surrounding by R3 Medium Density Residential and E1 Local Centre zoning reflected by its proximity to the Auburn Town Centre.

The site has not been utilised for industrial purposes since 2000 and has accommodated commercial uses consistent with the site's location in proximity to the Auburn Town Centre. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre representing a unique opportunity to facilitate further medical centre and office uses in an accessible location.

Cumberland Council is identified in the Central City District Plan (CCDP) as 'review and manage' for industrial land. The subject site is highly constrained and cannot facilitate industrial land uses in line with the existing zoning based on its location, vehicular access, configuration, size and likely impacts on the surrounding area. The value of industrial lands is not only based on the volume of jobs generated but the function of the industrial lands. The site is highly constrained for industrial land use and is currently used for commercial purposes thus not representing any existing value as industrial land.

This Planning Proposal outlines the intended effects of the proposed LEP amendments to the Cumberland LEP 2021 and provides justification for the proposed changes.

This Planning Proposal has been prepared in accordance with:

- Section 3.33 of the *Environmental Planning and Assessment Act 1979 (EP&A Act)*; and
- The Department of Planning and Environment – 'Local Environmental Plan Making Guideline.'

It is the first stage of the Planning Proposal which seeks the initial Department of Planning and Environment gateway determination to:

- Support the justification for the proposal;
- Confirm the technical investigations and consultation required; and
- Outline the process for continuing the assessment of the proposal.

Planning Proposal – 25 South Parade, Auburn

As outlined in a 'Local Environmental Plan Making Guideline', the Planning Proposal will evolve throughout the course of preparing the amending LEP as relevant sections will be updated and amended in response to the outcomes of technical investigations and consultation.

The proposal is considered to have a high level of strategic merit based on the following key areas:

- The proposal will provide for additional permitted uses that will positively contribute to the provision of services and facilities in an accessible location and in close proximity to residential and business zoned land;
- the proposed additional permitted uses are consistent with the surrounding site context, the proximity of the site to the Auburn Town Centre, the Auburn train station and existing health services facilities; and
- The proposal will facilitate the highest and best use of the site based on the site's location and context and provide uses that are more compatible with the surrounding R3 Medium Density Residential and E1 Local Centre zoned land.

The Planning Proposal forms part of a suite of documents that are submitted in support of the application attached as **Appendices A-I**.

Land to Which this Planning Proposal Applies

The subject site is located on the northern side of South Parade opposite the intersection of Alice Street and South Parade in Auburn. The surrounding area comprises a mix of residential development, mixed use and industrial development with the site being bound by the Main Suburban Railway to the north.

Development to the south comprises a range of medium density residential development in the form of residential flat buildings and dwellings and the St Joseph's Hospital with the St John's primary school located to the south east of the site.

Development to the west comprises industrial land uses to the north of South Parade and residential development on the southern side of South Parade. The Auburn Town Centre and train station is located in close proximity to the site to the south east.

The site's location and context is detailed in **Figure 1** below.

Planning Proposal – 25 South Parade, Auburn

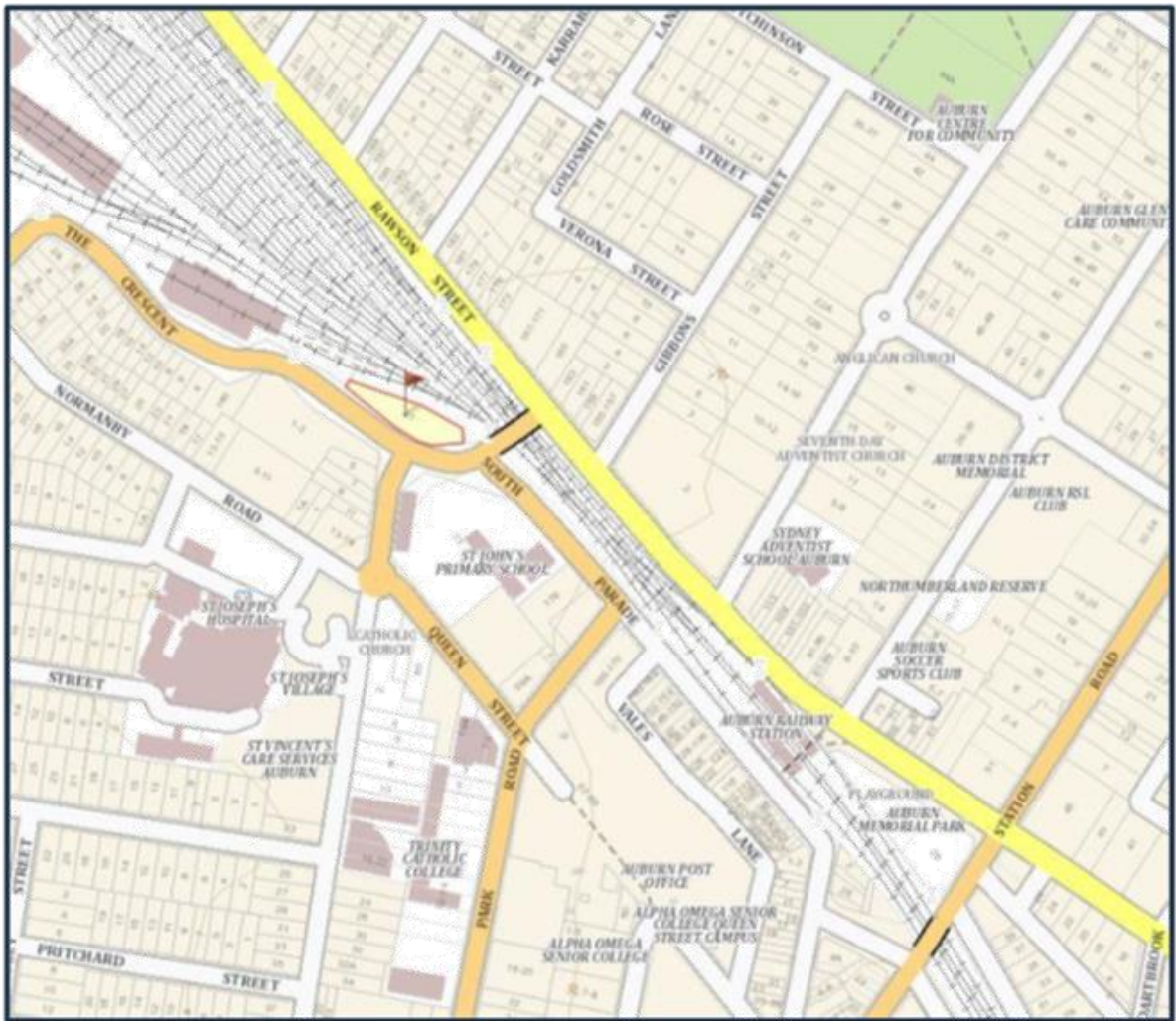


Figure 1: Location and Context of the site (Source: Six maps)

The site is commonly known as 25 South Parade, Auburn and legally described as Lot 2, DP806999. The site has an area of approximately 1,612m² with a frontage of approximately 102.7m to South Parade. The site currently contains a two-storey office building and at grade car parking approved under DA249/00.

A site aerial of the site is provided in Figure 2 below.

Planning Proposal – 25 South Parade, Auburn



Figure 2: Site aerial outlining the site in blue (Source: Nearmap)

Site History and Project Context

On 6 September 2000 development consent was issued by Council for the Construction of an office building and associated car parking area under DA249/00.

The building that was approved, and has since been constructed and occupied, is a two level commercial office building of around 860sqm GFA with around 22 outside car parking spaces. At the time of lodgement of the original DA in 2000 the land was zoned Special Uses (Railway) under the Auburn Planning Scheme.

The land was also affected by a draft Industrial 4(a) zone under a Draft LEP which would prohibit commercial office development.

Notwithstanding the draft industrial zone, Council’s assessment report in 2000 noted some negative aspects to industrial use of the site namely:

The shallow depth of the land is not conducive to industrial development and could result in a proposal for a factory facing onto the street with parking at the western end of the site. Such a proposal would likely have industrial access points in reasonable proximity to the Alice Street traffic lights and road bridge over the railway lines.

Planning Proposal – 25 South Parade, Auburn

Industrial development on the opposite side of the road to future residential flats is not desirable. The proposal for an office development is considered to be more compatible with the nearby residential uses.

The report also noted that the “site is within easy walking distance to Auburn Railway station and business area. Accordingly, the site is considered to be suitable for office development.”

The site is on the fringe of the Auburn Town Centre immediately west of the E1 Local Centre zone on the other side of South Parade and around 350m from Auburn Station. The approved and existing use of the site for commercial offices compliments the general strategic principles under the regional and district plans of land use and transport integration – namely promoting higher density employment and living spaces within walking distance of major public transport infrastructure.

The Planning Proposal seeks to facilitate the future use of the site for the purposes of a medical centre and office premises consistent with previous approvals for the site and the surrounding context.

Existing Zoning, Maximum Building Height and Surrounding Context

The site is zoned E4 General Industrial pursuant to the Cumberland LEP 2021. The subject site does not have a maximum building height under the Cumberland LEP 2021. The surrounding area is zoned as follows:

- North – SP2 Infrastructure (Railway) (no maximum building height);
- South – R3 Medium Density Residential (maximum building height of 9m) and E1 Local Centre (maximum building height of 38m); and
- West – E4 General Industrial (no maximum building height) and R3 Medium Density Residential (maximum building height of 9m).

The zoning of the site and surrounding area is detailed in **Figure 3** below.

Planning Proposal – 25 South Parade, Auburn

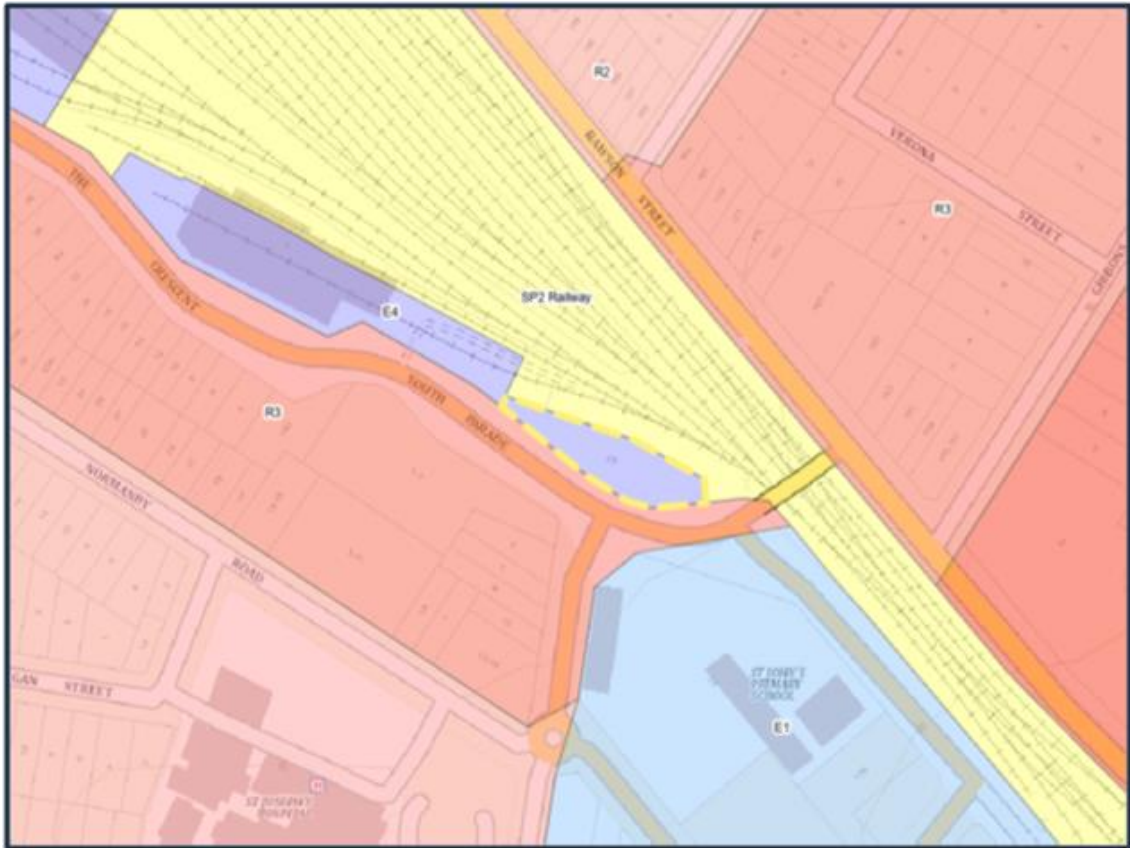


Figure 3: Zoning Map with the site outlined in yellow (Source: NSW Planning Portal)

Planning Proposal – 25 South Parade, Auburn

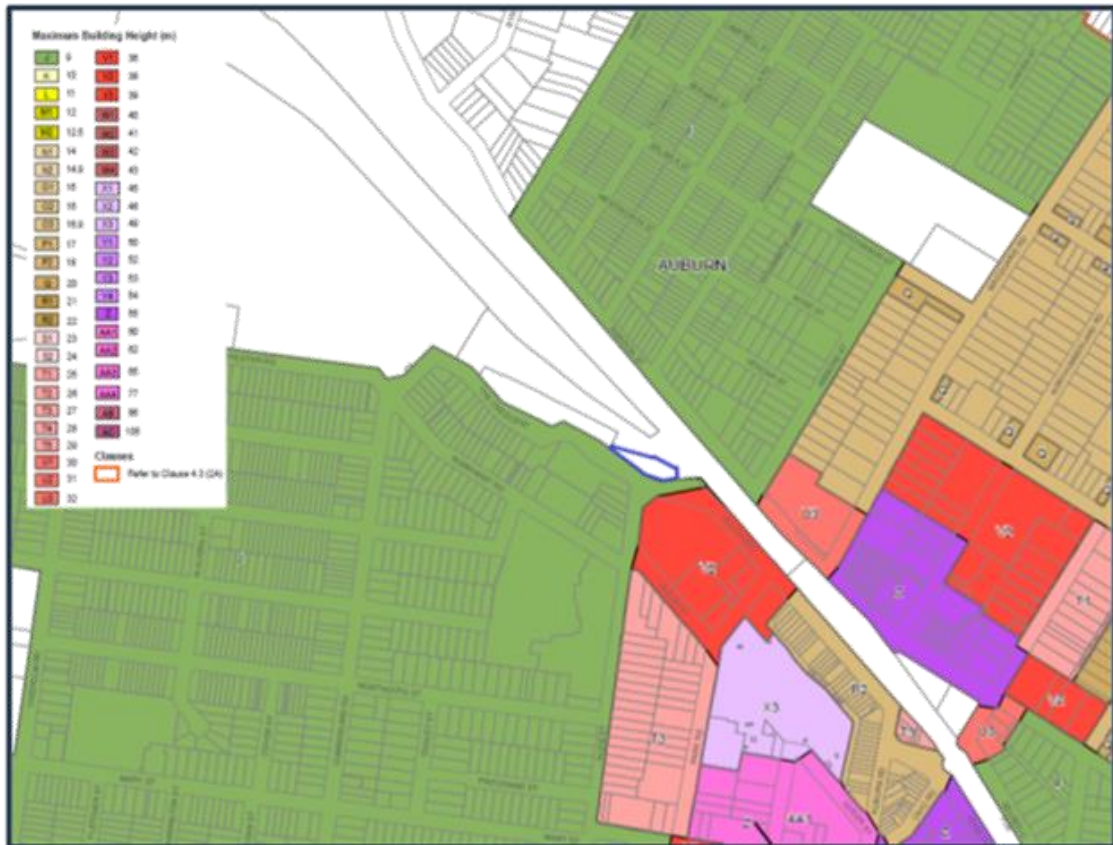


Figure 4: Maximum Building Height Map with the site outlined in blue (Source: NSW Legislation)

Proposed Amendments

The intent of the planning proposal is to facilitate the future use of the site for the purposes of medical centre and office premises uses that are consistent with development in the surrounding area and the surrounding context based on the site's proximity to the Auburn Town Centre. To achieve the intended outcome the planning proposal seeks to amend the Cumberland Local Environmental Plan (LEP) 2021 to include additional permitted uses of medical centre, office premises and a maximum building height of 11m at 25 South Parade, Auburn.

In summary the project objectives and intended outcomes will be achieved by:

- Amending the Cumberland LEP 2021 Additional Permitted Uses Map for the subject site (Sheet APU_012) to identify the site for additional permitted uses referenced in Schedule 1 of the LEP.
- Amending Schedule 1 of the Cumberland LEP 2021 – to include a provision relating to the subject site that would permit development for the purposes of medical centre and office premises; and
- Amending the Cumberland LEP 2021 Height of Buildings Map for the subject site (Sheet HOB_012) to identify a maximum building height of 11m.

Planning Proposal – 25 South Parade, Auburn

PART 1 – Objectives and Intended Outcomes

The planning proposal seeks to amend the Cumberland Local Environmental Plan (LEP) 2021 to include additional permitted uses of medical centre, office premises and a maximum building height of 11m at 25 South Parade, Auburn.

The project objective and intended outcome for the planning proposal is to facilitate the future use of the site for the purposes of a medical centre and office premises that are consistent with development in the surrounding area and the surrounding context based on the site's proximity to the Auburn Town Centre.

The subject site is currently zoned E4 General Industrial under the provisions of the Cumberland LEP 2021. Medical centres and office premises are prohibited in the E4 General Industrial zone. The site is bound by the Main Suburban Railway to the north and represents a small portion of industrial zoned land surrounding by R3 Medium Density Residential and E1 Local Centre zoning reflected by its proximity to the Auburn Town Centre.

In determining the strategic and site-based merit of the proposal, consideration must be given to the suitability of the proposed new uses in the context of the existing E4 zone objectives, which are to:

- To provide a range of industrial, warehouse, logistics and related land uses.
- To ensure the efficient and viable use of land for industrial uses.
- To minimise any adverse effect of industry on other land uses.
- To encourage employment opportunities.
- To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers.

The planning proposal seeks to include the additional permitted uses of medical centres and office premises on the site. The proposed additional permitted uses are consistent with the relevant objectives of the E4 General Industrial zone under the Cumberland LEP 2021 as follows:

- Based on the location and characteristics of the site the uses will not impede on the ability for adjoining industrial land to be accommodate a wide range of industrial, warehouse and logistics land uses;
- The proposed uses ensure the efficient and viable use of the site;
- The proposed uses will provide a range of employment opportunities for the community;
- Based on the location and characteristics of the site the uses proposed will not adversely impact on surrounding land uses; and
- The proposed uses will facilities or services to meet the day to day needs of workers and residents in the area.

Planning Proposal – 25 South Parade, Auburn

PART 2 – Explanation of Provisions

This Section In summary the project objectives and intended outcomes will achieved by:

- Amending the Cumberland LEP 2021 Additional Permitted Uses Map for the subject site (Sheet APU_012) to identify the site for additional permitted uses referenced in Schedule 1 of the LEP.
- Amending Schedule 1 of the Cumberland LEP 2021 – to include a provision relating to the subject site that would permit development for the purposes of medical centre and office premises.
- Amending the Cumberland LEP 2021 Height of Buildings Map for the subject site (Sheet HOB_012) to identify a maximum building height of 11m.

Thumbnail mapping of the above intended outcomes is provided below.

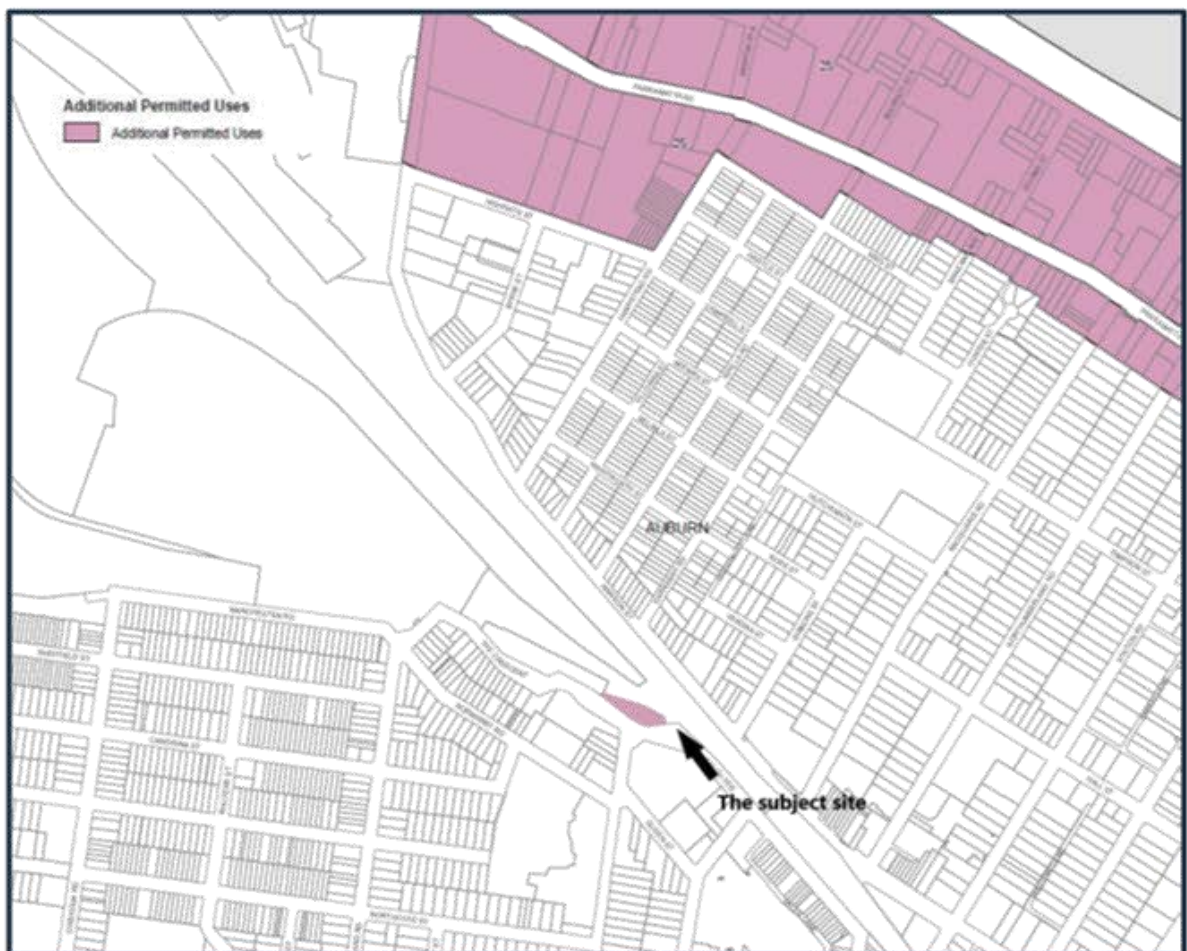


Figure 5: Proposed Additional Permitted Uses Map

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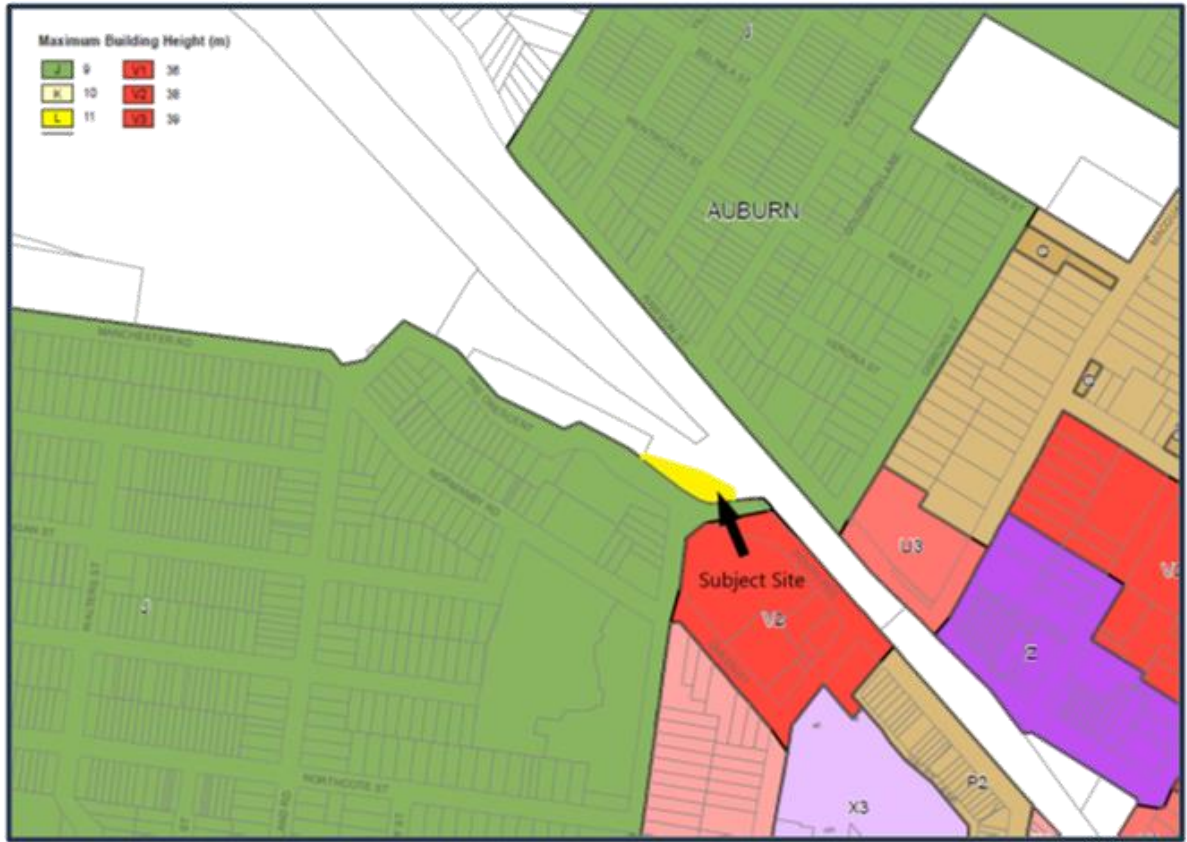


Figure 6: Proposed Maximum Building Height Map

PART 3 – Justification of Strategic and Site-Specific Merit

This section establishes the reasons for the proposed outcomes of the planning proposal and proposed amendments of the LEP. It addresses the key questions to be considered when demonstrating the justification as outlined in the Local Environmental Plan Making Guideline.

The key questions outlined relate to the need for the planning proposal, its strategic planning context, the environmental, social and economic impacts and the implications for State and Commonwealth government agencies.

A. NEED FOR PLANNING PROPOSAL

The planning proposal seeks to amend the Cumberland Local Environmental Plan (LEP) 2021 to include additional permitted uses of medical centres and office premises and a maximum building height of 11m at 25 South Parade, Auburn.

On 6 September 2000 development consent was issued by Council for the Construction of an office building and associated car parking area under DA249/00.

The building that was approved, and has since been constructed and occupied, is a two-level commercial office building of around 860sqm GFA with around 22 outside car parking spaces. At the time of lodgement of the original DA in 2000 the land was zoned Special Uses (Railway) under the Auburn Planning Scheme.

The land was also affected by a draft Industrial 4(a) zone under a Draft LEP which would prohibit commercial office development.

Notwithstanding the draft industrial zone, Council's assessment report in 2000 noted some negative aspects to industrial use of the site namely:

The shallow depth of the land is not conducive to industrial development and could result in a proposal for a factory facing onto the street with parking at the western end of the site. Such a proposal would likely have industrial access points in reasonable proximity to the Alice Street traffic lights and road bridge over the railway lines.

Industrial development on the opposite side of the road to future residential flats is not desirable. The proposal for an office development is considered to be more compatible with the nearby residential uses.

The report also noted that the "site is within easy walking distance to Auburn Railway station and business area. Accordingly, the site is considered to be suitable for office development."

The site is on the fringe of the Auburn Town Centre immediately west of the E1 Local Centre zone on the other side of South Parade and around 350m from Auburn Station. The approved and existing use of the site for commercial offices compliments the general strategic principles under the regional and district plans of land use and transport integration – namely promoting higher density employment and living spaces within walking distance of major public transport infrastructure.

Planning Proposal – 25 South Parade, Auburn

The subject site is currently zoned E4 General Industrial under the provisions of the Cumberland LEP 2021. Medical centres and premises are prohibited in the E4 General Industrial zone. The site is bound by the Main Suburban Railway to the north and represents a small portion of industrial zoned land surrounding by R3 Medium Density Residential and E1 Local Centre zoning reflected by its proximity to the Auburn Town Centre.

As detailed the site is currently zoned E4 General Industrial under the provisions of the Cumberland LEP 2021 and has an existing approval for office premises (commercial premises) which is prohibited in the E4 zone. The need for the planning proposal is influenced by a number of factors including the continued use of the site for office premises (formalization of existing use rights) whilst also providing additional permitted use of medical centres which are consistent with development in the surrounding area and the surrounding context based on the site's proximity to the Auburn Town Centre and the constraints of the site.

Cumberland Council is identified in the CCDP as 'review and manage' for industrial land. The subject site is highly constrained and cannot facilitate industrial land uses in line with the existing zoning based on its location, vehicular access, configuration, size and likely impacts on the surrounding area. The value of industrial lands is not only based on the volume of jobs generated but the function of the industrial lands. The site is highly constrained for industrial land use and is currently used for commercial purposes thus not representing any existing value as industrial land.

The site is not of a sufficient size or configuration to accommodate genuine industrial land uses and is ideally located to provide office and health services uses ancillary to the primary function of the nearby Auburn Town Centre and nearby health services facilities.

In determining the strategic and site-based merit of the proposal, consideration must be given to the suitability of the proposed new uses in the context of the existing E4 zone objectives, which are to:

- To provide a range of industrial, warehouse, logistics and related land uses.
- To ensure the efficient and viable use of land for industrial uses.
- To minimise any adverse effect of industry on other land uses.
- To encourage employment opportunities.
- To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers.

The planning proposal seeks to include the additional permitted uses of medical centres and office premises on the site. The proposed additional permitted uses are consistent with the relevant objectives of the E4 General Industrial zone under the Cumberland LEP 2021 as follows:

- Based on the location and characteristics of the site the uses will not impede on the ability for adjoining industrial land to be accommodate a wide range of industrial, warehouse and logistics land uses;
- The proposed uses ensure the efficient and viable use of the site;

Planning Proposal – 25 South Parade, Auburn

- The proposed uses will provide a range of employment opportunities for the community;
- Based on the location and characteristics of the site the uses proposed will not adversely impact on surrounding land uses; and
- The proposed uses will facilities or services to meet the day to day needs of workers and residents in the area.

The planning proposal will result in a number of positive social impacts on the surrounding area through the activation of an underutilized site for land uses that positively contribute to the vitality and viability of the Auburn Town Centre and nearby health services facilities.

The site has not been utilised for industrial purposes for an extended period of time and has accommodated commercial uses consistent with the site's location in proximity to the Auburn Town Centre. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre representing a unique opportunity to facilitate further medical centre and office premises in an accessible location providing services and facilities for both workers and residents in the area.

The future use of the site for office and health services is anticipated to be ancillary uses that positively contribute to the viability and vitality of the nearby Auburn Town Centre and nearby health services facilities. The proposal has been prepared to ensure the additional permitted uses do not adversely impact on the economic strength and vitality of the Auburn Town Centre and only includes uses that will support the centre based on the site's size and location.

The specific use of the site will be the subject of detailed development applications once the proposal is determined.

Therefore, there is a demonstrated need and strategic and site-based merit for the proposed additional permitted uses of office, business and health services uses on the site.

QUESTION 1 – Is the planning proposal a result of an endorsed LSPS, strategic study or report?

The Planning Proposal is not a result of any specific strategic study or report however a number of specialist studies have been undertaken in support of the proposal that demonstrate the suitability of the site for the additional permitted uses of medical centre and office premises. The specialist studies are provided as Appendices to this report.

In addition, a comprehensive assessment of the proposal has been undertaken against the strategic planning strategies and policies relevant to the site which is provided in the following sections of this report. The assessment has found that the Planning Proposal is generally consistent with the relevant objectives and actions of the key planning strategies and policies relevant to the site which are as follows:

- Greater Sydney Region Plan;
- Central City District Plan;
- Cumberland Local Strategic Planning Statement; and
- Cumberland Employment and Innovation Lands Strategy.

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QUESTION 2 – Is the planning proposal the best means of achieving the objectives or intended outcomes, or is there a better way?

There are three options that could apply to the site regarding its potential development. These are as follows:

Option 1: Do Nothing

This option does not promote the social and economic potential of the site which currently contains a commercial building on a site that has not been used for industrial purposes for an extended period of time. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre, representing a unique opportunity to facilitate further medical centre and office premises in an accessible location.

Option 2 – Lodge a Development Application

A Development Application is not viable as the current zoning does not allow for the development envisaged and no other alternate pathway under current legislation would facilitate the intended outcomes. Therefore, the planning proposal is the most efficient and time effective approach to delivering the outcomes envisaged for the site.

Option 3 – Planning Proposal

The planning proposal is the best means to achieve the intended outcomes of the site and is the most efficient and time effective way of doing so.

B. RELATIONSHIP TO STRATEGIC PLANNING FRAMEWORK

Question 3 – Will the planning proposal give effect to the objectives and actions of the applicable regional or district plan or strategy (including any exhibited draft plans or strategies)?

The Planning Proposal is consistent with the Greater Sydney Region Plan and the Central City District Plan.

Greater Sydney Region Plan

Greater Sydney Region Plan was finalised in March 2018 and replaces the former *A Plan for Growing Sydney (2014)*. This Plan sets the vision and the overarching planning framework to guide future transport, infrastructure, and development in Greater Sydney in concurrence with Future Transport 2056 and State Infrastructure Strategy.

The Plan provides planning priorities that will direct Sydney's growth over the next 20 years. The Region Plan identifies the overarching directions and objectives to guide growth in the Sydney region.

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The table below details the relevant planning priorities of the Central City District Plan and the proposal’s consistency with those priorities.

Table 1: Consistency with the Greater Sydney Region Plan	
Planning Objective	Comment
<p>Objective 1: Infrastructure supports the three cities</p> <p>Objective 2: Infrastructure aligns with forecast growth – growth infrastructure compact</p> <p>Objective 3: Infrastructure adapts to meet future needs</p> <p>Objective 4: Infrastructure use is optimised</p>	<p>The planning proposal is consistent with the planning objectives as it will utilise existing infrastructure in the area to provide additional permitted uses on an underutilized site that will provide additional services and facilities to the workers and residents in the area.</p> <p>The proposal ensures that the existing constrained industrial zoned site can be utilized and adapted to optimise the delivery of services and facilities in an accessible location that meets the existing and future needs of workers and residents in the area.</p> <p>Furthermore, the proposal will not adversely impact on the delivery of local, district or metropolitan infrastructure. Whilst it is noted the site adjoins the railway line, the site is not currently used for development that contributes to the delivery of infrastructure within the area. Any future development application will need to demonstrate that adequate arrangements can be made to service the development.</p> <p>The proposal will facilitate the use of the site to provide additional services and facilities in close proximity to existing and future residential areas, existing health services facilities and the Auburn Town Centre. The proposal represents a unique opportunity to provide additional social infrastructure in close proximity to residential development and employment opportunities within an accessible location, achieving the key objective of a 30-minute city. The provision of additional health services facilities in the area ensures a healthy and socially connected community can be fostered within the locality.</p>
<p>Objective 6: Services and infrastructure meet communities’ changing needs</p>	<p>The planning proposal is consistent with the planning objectives as it will provide services and employment opportunities in close proximity to residential land and public transport.</p>

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Table 1: Consistency with the Greater Sydney Region Plan	
Planning Objective	Comment
<p>Objective 7: Communities are healthy, resilient and socially connected</p> <p>Objective 8: Greater Sydney's communities are culturally rich with diverse neighbourhoods</p> <p>Objective 9: Greater Sydney celebrates the arts and supports creative industries and innovation</p>	<p>A Social Impact Comment has been prepared by Hill PDA in support of the proposal and is provided in Appendix G. The report makes the following conclusions:</p> <ul style="list-style-type: none"> • The Planning Proposal is likely to have very limited impacts on ways of life in terms of noise and traffic. • The Planning Proposal is likely to benefit both community cohesion and development, by supporting local access to potential employment and services. • The Planning Proposal would likely improve access to jobs in the local area. • The Planning Proposal is unlikely to impact local culture due to any heritage implications. Simultaneously, the site may make a positive cultural contribution to the area, and to Auburn town centre in particular by increasing the range of uses that would be permissible on the site • The Planning Proposal is likely to have a positive impact in terms of health and wellbeing, helping to expand the potential provision of local health services while supporting convenient employment opportunities for local residents • The Planning Proposal does not involve any changes to built form; it therefore does not risk impacting local character in this way. At the same time, the site may strengthen its surroundings by providing ancillary services that could benefit wider industrial lands, as well as Auburn town centre and nearby residents • The Planning Proposal would support a greater range of potential development on the site than what is currently possible, thus presenting a possible benefit for livelihoods in the area.
<p>Objective 10: Greater housing supply</p> <p>Objective 11: Housing is more diverse and affordable</p>	<p>The planning proposal is not inconsistent with the planning objectives as it will provide services and employment opportunities in close proximity to residential land and public transport.</p>

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Table 1: Consistency with the Greater Sydney Region Plan	
Planning Objective	Comment
<p>Objective 12: Great places that bring people together</p> <p>Objective 13: Environmental heritage is identified, conserved and enhanced</p>	<p>The planning proposal is not inconsistent with the planning objectives as it involves the use of an underutilized site providing activation and the highest and best use of the site based on its location and context.</p> <p>A Heritage Assessment has been prepared by Touring the Past in support of the proposal and is provided in Appendix H. The assessment states that the proposal is restricted to the provision of new permitted uses under the current zoning overlay at the place. No physical intervention, including sub-surface disruption, is proposed and concludes that the planning proposal is supportable from a heritage impact perspective.</p>
<p>Objective 14: A Metropolis of Three Cities – integrated land use and transport creates walkable and 30-minute cities</p> <p>Objective 15: The Eastern, GOP and Western Economic Corridors are better connected and more competitive</p> <p>Objective 16: Freight and logistics network is competitive and efficient</p> <p>Objective 17: Regional connectivity is enhanced</p>	<p>The planning proposal is consistent with the planning objectives as it will provide additional services and facilities in close proximity to residential development, employment land within an accessible location achieving the key objective of a 30-minute city.</p>
<p>Objective 18: Harbour CBD is stronger and more competitive</p> <p>Objective 19: Greater Parramatta is stronger and better connected</p> <p>Objective 20: Western Sydney Airport and Badgerys Creek Aerotropolis are economic catalysts for Western Parkland City</p> <p>Objective 21: Internationally competitive health, education, research and innovation precincts</p>	<p>The planning proposal is consistent with the planning objectives as it will provide additional services and facilities in close proximity to residential development and the Auburn Town Centre. The proposal will provide ancillary land uses that positively contribute to the Auburn Town Centre and existing health services facilities that are located in close proximity to the site.</p> <p>Cumberland Council is identified in the CCDP as 'review and manage' for industrial land.</p> <p>As previously outlined, the subject site is highly constrained and cannot facilitate industrial land uses in line with the existing zoning based on its location, vehicular access,</p>

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Table 1: Consistency with the Greater Sydney Region Plan	
Planning Objective	Comment
<p>Objective 22: Investment and business activity in centres</p> <p>Objective 23: Industrial and urban services land is planned, retained and managed</p> <p>Objective 24: Economic sectors are targeted for success</p>	<p>configuration and size. This was also the opinion of Council staff upon approval of DA249/00 as discussed above. Since 2000, the site has been used for a variety of office purposes with no restriction to those office uses being linked to industrial development. This proposal therefore does not result in 'loss of industrial land.'</p> <p>The approved and existing use of the site for commercial offices compliments the general strategic principles under the regional and district plans of land use and transport integration – namely promoting higher density employment and living spaces within walking distance of major public transport infrastructure.</p> <p>As outlined in Hill PDA's Economic Impact Assessment (Appendix D) the site has existing use rights which is the 'highest and best' use of the site. It is not viable to attract advance manufacturing and innovation on this particular site due to its existing use and improvements, location, site constraints, small site area and potential adverse impacts in the locality. Hence it is impossible to make a contribution towards meeting this objective. The important consideration is that the planning proposal will not undermine this objective as measured against the base case.</p>
<p>Objective 25: The coast and waterways are protected and healthier</p> <p>Objective 26: A cool and green parkland city in the South Creek corridor</p> <p>Objective 27: Biodiversity is protected, urban bushland and remnant vegetation is enhanced</p> <p>Objective 28: Scenic and cultural landscapes are protected</p>	<p>The proposal is not inconsistent with the planning objectives as it will facilitate the future use of the site for the purposes of a medical centre and office premises. The future uses of the site will be wholly accommodated within the existing site and will not impact on bushland, biodiversity or open space within the surrounding area.</p>

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Table 1: Consistency with the Greater Sydney Region Plan	
Planning Objective	Comment
<p>Objective 29: Environmental, social and economic values in rural areas are protected and enhanced</p> <p>Objective 30: Urban tree canopy cover is increased</p> <p>Objective 31: Public open space is accessible, protected and enhanced</p> <p>Objective 32: The Green Grid links parks, open spaces, bushland and walking and cycling paths</p>	
<p>Objective 33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change</p> <p>Objective 34: Energy and water flows are captured, used and re-used</p> <p>Objective 35: More waste is re-used and recycled to support the development of a circular economy</p>	<p>The proposal is not inconsistent with the planning objectives as it will utilise an existing site that ensures future development utilises existing infrastructure reducing carbon emissions, managing energy and waste efficiently.</p>
<p>Objective 36: People and places adapt to climate change and future shocks and stresses</p> <p>Objective 37: Exposure to natural and urban hazards is reduced</p> <p>Objective 38: Heatwaves and extreme heat are managed</p>	<p>The proposal is not inconsistent with the planning objectives as it will utilise an existing site and future developments will be required to demonstrate consistency with the client and urban hazards.</p>

Central City District Plan

The Central City District Plan is a guide for the implementation of *A Metropolis of Three Cities* – the Greater Sydney Region Plan at a district level.

A Metropolis of Three Cities – the Greater Sydney Region Plan was implemented by the Greater Sydney Commission and is built on a vision of three cities where most residents live within 30 minutes of their

Planning Proposal – 25 South Parade, Auburn

jobs, education and health facilities, services and great places. To meet the needs of a growing and changing population the vision seeks to transform Greater Sydney into a metropolis of three cities:

- the Western Parkland City
- the Central River City
- the Eastern Harbour City.

Greater Sydney’s three cities reach across five districts: Western City District, Central City District, Eastern City District, North District and South District.

The Central City District consists of the Blacktown, Cumberland, Parramatta and The Hills Local Government Areas and contains the subject site.

The Central City District Plan is structured to implement the aim of the Greater Sydney Region Plan to provide cities where most residents live within 30 minutes of their jobs, education and health facilities, services and great places. This is to be achieved through a number of planning priorities detailed in the plan. The proposed development is considered to be consistent with the objectives of the plan and a number of planning priorities.

The table below details the relevant planning priorities of the Central City District Plan and the proposal’s consistency with those priorities.

Table 2: Consistency with the Central City District Plan	
Planning Priority	Comment
<p>Planning Priority C1 – Planning for a city supported by infrastructure</p> <p>Planning Priority C2 – Working through Collaboration</p>	<p>The planning proposal is consistent with the planning priorities as it will utilise existing infrastructure in the area to accommodate additional permitted uses on an underutilized site that will provide additional services and facilities to the workers and residents in the area.</p> <p>The proposal ensures that the existing constrained industrial zoned site can be utilized and adapted to optimise the delivery of services and facilities in an accessible location that meets the existing and future needs of workers and residents in the area.</p> <p>Furthermore, the proposal will not adversely impact on the delivery of local, district or metropolitan infrastructure. Whilst it is noted the site adjoins the railway line, the site is not currently used for development that contributes to the delivery of infrastructure within the area. Any future development application will need to demonstrate that</p>

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Table 2: Consistency with the Central City District Plan	
Planning Priority	Comment
<p>Planning Priority C3 – Providing services and social infrastructure to meet people’s changing needs</p> <p>Planning Priority C4 – Fostering healthy, creative, culturally rich and socially connected communities</p>	<p>adequate arrangements can be made to service the development.</p> <p>The proposal will facilitate the use of site to provide additional services and facilities in close proximity to existing and future residential areas, existing health services facilities and the Auburn Town Centre. The proposal represents a unique opportunity to provide additional social infrastructure in close proximity to residential development and employment opportunities within an accessible location achieving the key objective of a 30-minute city. The provision of additional health services facilities in the area ensures a healthy and socially connected community can be fostered within the locality.</p>
<p>Planning Priority C5 – Providing housing supply, choice and affordability with access to jobs, services and public transport.</p>	<p>The planning proposal is not inconsistent with the planning priority as it will provide services and employment opportunities in close proximity to residential land and public transport.</p> <p>A Social Impact Comment has been prepared by Hill PDA in support of the proposal and is provided in Appendix G. The report makes the following conclusions:</p> <ul style="list-style-type: none"> • The Planning Proposal is likely to have very limited impacts on ways of life in terms of noise and traffic. • The Planning Proposal is likely to benefit both community cohesion and development, by supporting local access to potential employment and services. • The Planning Proposal would likely improve access to jobs in the local area. • The Planning Proposal is unlikely to impact local culture due to any heritage implications. Simultaneously, the site may make a positive cultural contribution to the area, and to Auburn town centre in particular by increasing the range of uses that would be permissible on the site • The Planning Proposal is likely to have a positive impact in terms of health and wellbeing, helping to expand the potential provision of local health services while

Planning Proposal – 25 South Parade, Auburn

Table 2: Consistency with the Central City District Plan	
Planning Priority	Comment
	<p>supporting convenient employment opportunities for local residents</p> <ul style="list-style-type: none"> The Planning Proposal does not involve any changes to built form; it therefore does not risk impacting local character in this way. At the same time, the site may strengthen its surroundings by providing ancillary services that could benefit wider industrial lands, as well as Auburn town centre and nearby residents The Planning Proposal would support a greater range of potential development on the site than what is currently possible, thus presenting a possible benefit for livelihoods in the area.
<p>Planning Priority C6 – Creating and renewing great places and local centres, and respecting the District’s heritage</p>	<p>The planning proposal is not inconsistent with the planning priority as it involves the use of an existing underutilized site providing activation and the highest and best use of the site based on its location and context.</p> <p>A Heritage Assessment has been prepared by Touring the Past in support of the proposal and is provided in Appendix H. The assessment states that the proposal is restricted to the provision of new permitted uses under the current zoning overlay at the place. No physical intervention, including sub-surface disruption, is proposed and concludes that the planning proposal is supportable from a heritage impact perspective.</p>
<p>Planning Priority C7 - Growing a stronger and more competitive Greater Parramatta Planning Priority C8 - Delivering a more connected and competitive GPOP Economic Corridor</p>	<p>Planning Priority C7 and C8 of the CCDP relates to growing a stronger and more competitive Greater Parramatta. The subject site is located outside of the Greater Parramatta Metropolitan Area (GPA) identified within the CCDP.</p> <p>Whilst the priority does not provide specific guidance for the site or surrounding area it states the following:</p> <p><i>To reinforce Greater Parramatta as one of Greater Sydney’s metropolitan city centres, planning must deliver land use and infrastructure that:</i></p> <ul style="list-style-type: none"> <i>provides capacity for jobs growth</i> <i>creates opportunities for investment and business</i>

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Table 2: Consistency with the Central City District Plan	
Planning Priority	Comment
	<ul style="list-style-type: none"> enhances accessibility to a larger and more diverse labour pool improves business-to-business interactions and access to other job agglomerations. <p>The proposal is consistent with the Planning Priorities as it will utilise a constrained industrial zoned site (currently accommodating commercial use), that is not of sufficient size or configuration to accommodate industrial land uses, for the purposes of office premises and a medical centre in close proximity to the Auburn Town Centre, train station and existing residential land. This will:</p> <ul style="list-style-type: none"> provides capacity for jobs growth in an accessible location on an underutilized site; create opportunities for investment and business in close proximity to the Auburn Town Centre and residential land; enhance accessibility to a larger and more diverse labour pool; and improve business-to-business interactions and access to other job agglomerations. <p>Hill PDA have prepared a response letter on the Economic Impact of the proposal which is provided as Appendix D.</p> <p>The site has existing use rights which is the 'highest and best' use of the site. It is not viable to deliver conforming industrial uses on the site due to its existing use and improvements, location, site constraints, site area (being only 1,612sqm) and potential adverse impacts in the locality (having only local street access opposite existing medium-density residential). For these reasons it will be impossible for the site to contribute towards maximising opportunities 'for local industrial employment in proximity to transport and housing'. The important consideration is that the planning proposal will not undermine this objective (ie reduce 'opportunities for local industrial employment in proximity to transport and housing') as measured against the base case.</p>

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Table 2: Consistency with the Central City District Plan	
Planning Priority	Comment
<p>Planning Priority C9 - Delivering integrated land use and transport planning and a 30-minute city</p>	<p>Planning Priority C9 of the CCDP seeks to deliver integrated land use and transport planning to provide walkable and 30 minute cities. The CCDP outlines the vision as being:</p> <p><i>The 30-minute city is a long-term aspiration that will guide decision-making on locations for new transport, housing, jobs, tertiary education, hospitals and other amenities. It means that they will be planned for metropolitan and strategic centres and more people will have public transport access to their closest metropolitan or strategic centre within 30 minutes. This will enable more efficient access to workplaces, services and community facilities.</i></p> <p>The proposal is consistent with Planning Priority C9 of the CCDP as it will facilitate the use of the existing site to provide additional services and facilities in close proximity to existing and future residential areas, existing health services facilities and the Auburn Town Centre. The proposal represents a unique opportunity to provide additional social infrastructure in close proximity to residential development and employment opportunities within an accessible location achieving the key objective of a 30-minute city.</p> <p>Whilst it is noted that the site is located adjacent to the railway line the site is not currently utilized for and is not of a sufficient size or configuration to accommodate industrial land uses associated with freight or transport.</p> <p>Due to the site’s constraints and existing commercial use the proposal will not adversely impact on the operation of the railway line or operation of freight within the precinct. The additional permitted uses will provide services and facilities for workers and residents in the area and positively contribute to the provision of a walkable 30 minute city.</p> <p>The other important consideration is that the planning proposal will deliver more jobs on site in close proximity to Auburn Railway Station than any complying industrial use</p>

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Table 2: Consistency with the Central City District Plan	
Planning Priority	Comment
<p>Planning Priority C10 - Growing investment, business opportunities and jobs in strategic centres</p> <p>Planning Priority C11 - Maximising opportunities to attract advanced manufacturing and innovation in industrial and urban services</p>	<p>based on the constraints and characteristics of the site. Hence it will make a stronger contribution towards meeting the planning objective of 'delivering integrated land use and transport planning and a 30-minute city'.</p> <p>The planning proposal is consistent with the planning priority as it will provide additional services and facilities in close proximity to residential development and the Auburn Town Centre. The proposal will provide ancillary land uses that positively contribute to the Auburn Town Centre and existing health services facilities that are located in close proximity to the site.</p> <p>Planning Priority C11 seeks to achieve Objective 23 of the Greater Sydney Region Plan which states the following:</p> <p><i>Industrial and urban services land is planned, retained and managed.</i></p> <p>Cumberland Council is identified in the CCDP as 'review and manage' for industrial land.</p> <p>As previously outlined, the subject site is highly constrained and cannot facilitate industrial land uses in line with the existing zoning based on its location, vehicular access, configuration and size. This was also the opinion of Council staff upon approval of DA249/00 as discussed above. Since 2000, the site has been used for a variety of office purposes with no restriction to those office uses being linked to industrial development. This proposal therefore does not result in 'loss of industrial land.'</p> <p>The approved and existing use of the site for commercial offices compliments the general strategic principles under the regional and district plans of land use and transport integration – namely promoting higher density employment and living spaces within walking distance of major public transport infrastructure.</p> <p>As outlined in Hill PDA's Economic Assessment (Appendix D) the site has existing use rights which is the 'highest and</p>

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Table 2: Consistency with the Central City District Plan	
Planning Priority	Comment
<p>Planning Priority C12 - Supporting growth of targeted industry sectors</p>	<p>best' use of the site. It is not viable to attract advance manufacturing and innovation on this particular site due to its existing use and improvements, location, site constraints, small site area and potential adverse impacts in the locality. Hence it is impossible to make a contribution towards meeting this objective. The important consideration is that the planning proposal will not undermine this objective as measured against the base case.</p> <p>The proposal is consistent with Planning Priority C12 as it will not result in the loss of industrial land. As previously outlined, the subject site is highly constrained and cannot facilitate industrial land use in line with the existing zoning based on its location, vehicular access, configuration and size. This was also the opinion of Council staff upon approval of DA249/00 as discussed above. Since 2000, the site has been used for a variety of office purposes with no restriction to those office uses being linked to industrial development. This proposal therefore does not result in 'loss of industrial land.'</p> <p>The proposal will provide for additional services and facilities that can support the growth of targeted industry sectors within the surrounding area. Based on the constraints of the site it cannot accommodate industrial land uses that will support the growth of targeted industry sectors and therefore the proposal is the most suitable way to contribute to the achievement of the planning priority within the area. Furthermore, the proposal will co-locate additional health services facilities in close proximity to existing health services facilities in an accessible location.</p>
<p>Planning Priority C13 - Protecting and improving the health and enjoyment of the District's waterways</p> <p>Planning Priority C14 - Creating a Parkland City urban structure and identity, with South Creek as a defining spatial element</p>	<p>The proposal is not inconsistent with the planning priorities as it will facilitate the future use of the site for the purposes of medical centre and office premises uses. The future uses of the site will be wholly accommodated within the existing disturbed site and will not impact on bushland, biodiversity or open space within the surrounding area.</p>

Planning Proposal – 25 South Parade, Auburn

Table 2: Consistency with the Central City District Plan	
Planning Priority	Comment
<p>Planning Priority C15 - Protecting and enhancing bushland, biodiversity and scenic and cultural landscapes</p> <p>Planning Priority C16 - Increasing urban tree canopy cover and delivering Green Grid connections</p> <p>Planning Priority C17 - Delivering high quality open space</p>	
<p>Planning Priority C18 - Better managing rural areas</p>	<p>The proposal is not inconsistent with this planning principle as it relates to an established urban area and will not impact on the management of existing rural areas.</p>
<p>Planning Priority C19 - Reducing carbon emissions and managing energy, water and waste efficiently</p> <p>Planning Priority C20 - Adapting to the impacts of urban and natural hazards and climate change</p>	<p>The proposal is not inconsistent with the planning objectives as it will utilise an existing site that ensures future development utilises existing infrastructure reducing carbon emissions, managing energy and waste efficiently.</p>
<p>Planning Priority C21 - Preparing local strategic planning statements informed by local strategic planning</p> <p>Planning Priority C22 - Monitoring and reporting on the delivery of the plan</p>	<p>The planning proposal is consistent with the Cumberland local strategic planning statement.</p>

QUESTION 4 – Is the planning proposal consistent with a Council LSPS that has been endorsed by the Planning Secretary or GSC, or another endorsed local strategy or strategic plan?

Cumberland Local Strategic Planning Statement (LSPS)

Cumberland 2030: Our Local Strategic Planning Statement is the Local Strategic Planning Statement that plans for the Cumberland area’s economic, social and environmental land use needs over the next 10 years, and is aligned to the 20 year vision for Cumberland. It sets clear planning priorities about what will be needed, such as jobs, homes, services and parks. Cumberland 2030 also sets out actions to deliver the priorities for the community’s future vision.

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The LSPS is structured around the following four key themes:

- Development and Infrastructure;
- Jobs and Investment;
- Environment and Open Spaces; and
- Traffic and Transport.

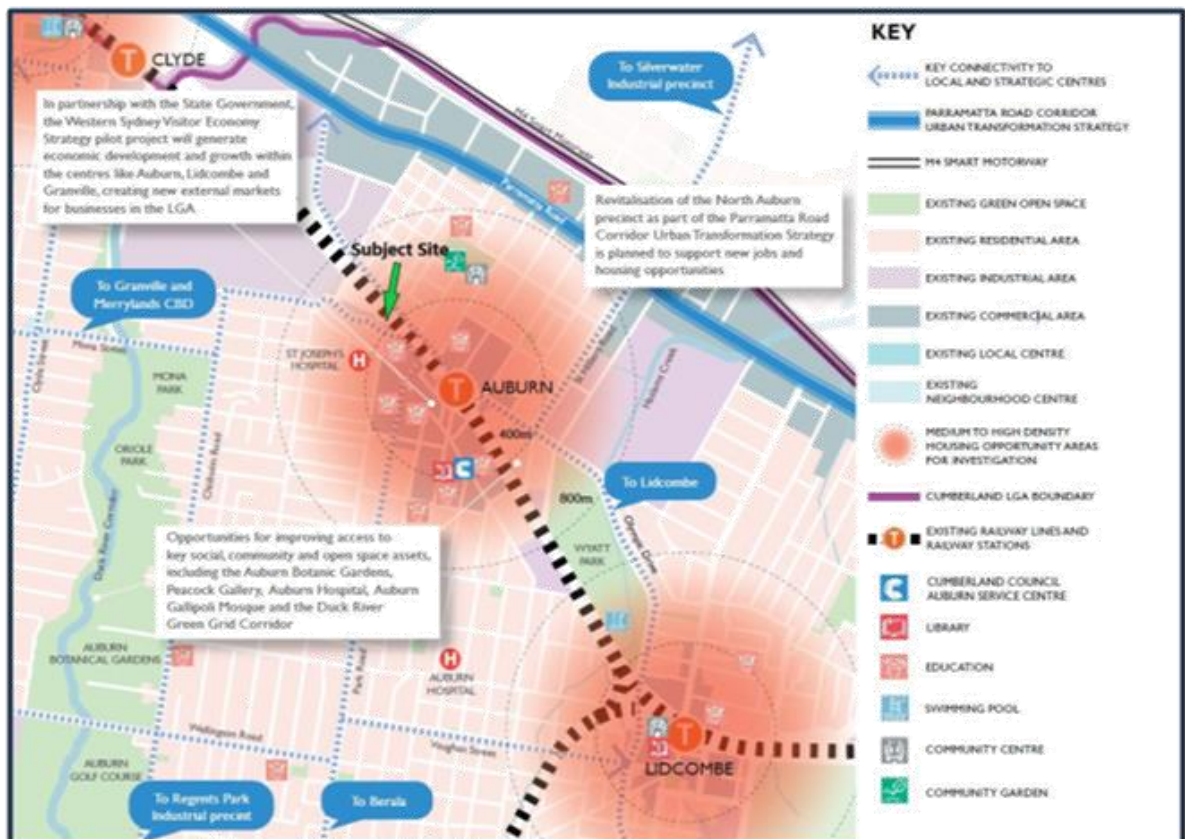


Figure 7: LSPS Auburn Town Centre Map with the site indicated by the green arrow (Source: Cumberland LSPS)

As detailed above the site is located within close proximity to the Auburn Town Centre. Whilst the above figure identifies the site as being located within a medium to high density residential investigation area the site cannot be used for medium or high-density housing given its current E4 zoning and the relevant constraints of the site. The proposed additional permitted uses will enable the revitalization of the site for uses which will cater for the existing and future needs of the community and will not impact on the economic viability of the existing Auburn Town Centre.

The planning proposal is consistent with the objectives and key themes of the statement. An assessment of the proposal against the key planning priorities of the LSPS is provided in the table below.

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Table 3: Consistency with the Cumberland Local Strategic Planning Statement	
Planning Priority	Comment
<p>1. Strengthening Cumberland's position in the district through collaboration</p> <p>2. Advocating for a range of transport options that connect our town centres and employment hubs, both locally and to Greater Sydney</p>	<p>The proposal is not inconsistent with the planning priorities as it will facilitate the use of an underutilized site to provide additional services and facilities in close proximity to existing and future residential areas, existing health services facilities and the Auburn Town Centre. The proposal represents a unique opportunity to provide additional social infrastructure in close proximity to residential development and employment opportunities within an accessible location achieving the key objective of a 30-minute city.</p>
<p>3. Aligning local infrastructure delivery with planned growth</p> <p>4. Improving accessibility within our town centres to accommodate the changing structure of families and households and enable ageing in place</p>	<p>The planning proposal is consistent with the planning priorities as it will utilize existing infrastructure within the surrounding area to accommodate additional permitted uses onsite that are consistent with the surrounding context and streetscape. The additional permitted uses will provide additional services and facilities to the workers and residents in the area. The proposal will not result in development that will adversely impact on the delivery of local, district or metropolitan infrastructure. Any future development application will need to demonstrate that adequate arrangements can be made to service the development.</p> <p>The proposal will facilitate the use of the site to provide additional services and facilities in close proximity to existing and future residential areas, existing health services facilities and the Auburn Town Centre. The proposal represents a unique opportunity to provide additional social infrastructure in close proximity to residential development and employment opportunities within an accessible location achieving the key objective of a 30-minute city. The provision of additional health services facilities in the area ensures a healthy and socially connected community can be fostered within the locality.</p> <p>The subject site forms a small part of the Clyde Marshalling Yards, which is of archaeological value under the CLEP 2021.</p>

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Table 3: Consistency with the Cumberland Local Strategic Planning Statement	
Planning Priority	Comment
	A Heritage Assessment has been prepared by Touring the Past in support of the proposal and is provided in Appendix H . The assessment states that the proposal is restricted to the provision of new permitted uses under the current zoning overlay at the place. No physical intervention, including sub-surface disruption, is proposed and concludes that the planning proposal is supportable from a heritage impact perspective.
<p>5. Delivering housing diversity to suit changing needs</p> <p>6. Delivering affordable housing suitable for the needs of all people at various stages of their lives</p>	The planning proposal is not inconsistent with the planning priorities as it will provide services and employment opportunities in close proximity to residential land and public transport.
<p>7. Design vibrant and attractive centres and encourage healthy living</p> <p>8. Celebrating our natural, built and cultural diversity</p> <p>9. Providing high quality, fit-for-purpose community and social infrastructure in line with growth and changing requirements</p>	The proposal is consistent with the planning priorities as it involves the use of an existing underutilized site providing activation of the site and providing services and facilities in proximity to residential development and the Auburn Town Centre. The proposal will provide additional ancillary services and facilities that will positively contribute to the vitality and viability of the Auburn Town Centre whilst providing for the existing and future needs of the community.
<p>10. Supporting a strong and diverse local economy across town centres and employment hubs</p> <p>11. Promoting access to local jobs, education opportunities and care services</p>	<p>The proposal is consistent with the planning priorities as it seeks to facilitate the future use of the site for the purposes of medical centre and office premises uses that are consistent with development in the surrounding area and the surrounding context based on the site’s proximity to the Auburn Town Centre.</p> <p>The site has not been utilised for industrial purposes for an extended period of time and has accommodated commercial uses consistent with the site’s location in proximity to the Auburn Town Centre. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre, representing a unique</p>

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Table 3: Consistency with the Cumberland Local Strategic Planning Statement	
Planning Priority	Comment
12. Facilitating the evolution of employment and innovation lands to meet future needs	<p>opportunity to facilitate further health services facilities and office premises in an accessible location. The proposal will promote access to local employment and health care opportunities in proximity to residential development.</p> <p>Cumberland Council is identified in the CCDP as 'review and manage' for industrial land. The value of industrial lands is not only based on the volume of jobs generated but the function of the industrial lands.</p> <p>The site is highly constrained for industrial land use and is currently used for commercial purposes thus not representing any existing value as industrial land.</p> <p>As outlined in Hill PDA's Economic Assessment (Appendix D) the site has existing use rights which is the 'highest and best' use of the site. It is not viable to deliver conforming industrial uses on the site due to its existing use and improvements, location, site constraints, site area (being only 1,612sqm) and potential adverse impacts in the locality. Therefore, when measured against the base case the planning proposal would not detract from the value and function of the industrial lands and limit opportunities for local jobs in this sector.</p> <p>The proposal will not result in the loss or encroachment of industrial land. As previously outlined, the subject site is highly constrained and cannot facilitate industrial land use in line with the existing zoning based on its location, vehicular access, configuration and size. Since 2000, the site has been used for a variety of office purposes with no restriction to those office uses being linked to industrial development. This proposal therefore does not result in 'loss of industrial land.'</p> <p>The proposal will provide for additional services and facilities that can support the evolution of employment and innovation lands within the surrounding area. Based on the constraints of the site it cannot accommodate industrial land uses that will support the support the evolution of</p>

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Table 3: Consistency with the Cumberland Local Strategic Planning Statement	
Planning Priority	Comment
	employment and innovation lands and therefore the proposal is the most suitable way to contribute to the achievement of the planning priority within the area.
<p>13. Protecting, enhancing and increasing natural and green spaces</p> <p>14. Improving access to and health of waterways</p> <p>15. Planning for a resilient city that can adapt to natural hazards and climate change</p> <p>16. Supporting urban cooling to minimise heat island effects</p>	The proposal is not inconsistent with the planning priorities as it will facilitate the future use of the site for the purposes of medical centre and office premises uses. The future uses of the site will be wholly accommodated within the existing disturbed site and will not impact on bushland, biodiversity or open space within the surrounding area.

Cumberland Employment and Innovation Lands Strategy

The Cumberland Employment and Innovation Lands Strategy presents a strategic and coordinated approach developed by Council in consultation with the community and industry to support future economic opportunities for Cumberland that will continue to make the area an attractive place for residents, workers and visitors.

The Strategy outlines the land use approach for employment and innovation land precinct across the Cumberland area as well as other actions and services which can be implemented by Council that complement land use development for these areas.

The Strategy aligns with the work of the Greater Sydney Commission and the Central City District Plan by maintaining existing employment and innovation lands in Cumberland, and providing a strategic framework that can support growth and maximise opportunities for the Cumberland area.

The subject site sits adjacent to and does not form part of the Clyburn ‘Services and Innovation’ Precinct as identified within the Cumberland Employment and Innovation Lands Strategy and Study (EILS), refer to **Figure 8** below.



Figure 8: Clyburn Precinct (indicated in purple) with the site identified by the green arrow (Source: Cumberland EILS)

Despite the site not being located within the Clyburn Services and Innovation Precinct the proposal does not impact on the precinct's ability to meet the following Planning Principles and Target Activities as identified in the EILS supporting study:

Planning Principles

Maintain functional industrial and logistic uses to support the important transport, freight and waste recycling function of the Precinct.

Support the evolution of the precinct to meet future employment and innovation needs for Cumberland

Target Activities

Target continued transport and logistics/freight industries.

Support employment uses and businesses that can co-exist within the transport and freight environment.

The subject site currently accommodates commercial office premises and does not contribute to industrial and logistic/freight uses within the precinct.

The proposal will not result in the loss or encroachment of industrial land. As previously outlined, the subject site is highly constrained and cannot facilitate industrial land use in line with the existing zoning based on its location, vehicular access, configuration and size. Since 2000, the site has been used for a

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variety of office purposes with no restriction to those office uses being linked to industrial development. This proposal therefore does not result in 'loss of industrial land.'

Based on the constraints of the site it cannot accommodate industrial land uses that will support the evolution of employment and innovation lands and therefore the proposal is the most suitable way to contribute to the achievement of the planning principles and target activities. Furthermore, the proposal will co-locate additional health services facilities in close proximity to existing health services facilities in an accessible location.

Any proposed future uses of the site will need to demonstrate that they can co-exist with the nearby freight and transport system under future development applications. This will ensure Council can appropriately manage any required buffer distances and facilitate development that is compatible with the surrounding context.

The planning proposal is considered to be consistent with the objectives of the plan and a number of planning priorities. The table below details the relevant planning priorities of the strategy and the proposal's consistency with those priorities.

Table 4: Consistency with the Cumberland Employment and Innovation Lands Strategy	
Planning Priority	Comment
1. Elevating the strategic importance of Cumberland's employment and innovation lands within the context of strategic planning for Greater Sydney and the Central City District and identify their role and function	The planning proposal is not inconsistent with the planning priority as it will provide for additional employment generating land uses in proximity to the Auburn Town Centre and established residential areas. The site is not of a sufficient size or configuration to accommodate industrial, or innovation lands and the planning proposal seeks to provide the highest and best use of the site with regards to its location and context. The proposal will provide land uses that complement the site's location providing ancillary uses to the Auburn Town Centre and nearby health services facilities.
2. Recognising the importance of the freight network in supporting the ongoing viability of employment and innovation lands to ensure the major freight routes and facilities are not unnecessarily constrained by residential growth in the vicinity	The planning proposal is not inconsistent with the planning priority as the proposed use of the site will not impede the operation or importance of the freight network within the area. The site is bound by the Main Suburban Railway to the north and represents a small portion of industrial zoned land surrounding by R3 Medium Density Residential and E1 Local Centre zoning reflected by its proximity to the Auburn Town Centre. The site is therefore constrained and cannot provide industrial land uses that will positively contribute

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Table 4: Consistency with the Cumberland Employment and Innovation Lands Strategy	
Planning Priority	Comment
	<p>to the freight network and it is therefore proposed to accommodate land uses that will provide services and facilities to cater to the needs of workers and residents in the area.</p> <p>The EILS Study states the following in relation to consideration of the Key Freight Transport Accessibility Map:</p> <p><i>Employment and innovation lands located near these key freight routes should be buffered from sensitive uses, nurtured and allowed to prosper.</i></p> <p><i>Council should be satisfied that any planning proposals in the areas surrounding the employment and innovation lands along key freight routes should not preclude the continued use of those routes for freight.</i></p> <p>The subject site currently accommodates commercial office premises and does not contribute to industrial and logistic/freight uses within the precinct.</p> <p>Based on the constraints of the site it cannot accommodate industrial land uses that will support freight industries and the existing commercial use of the site does not impact on the continued use of the key routes for freight.</p> <p>The proposal will provide additional services and facilities that can support the evolution of employment and innovation lands within the surrounding area.</p> <p>Any proposed future uses of the site will need to demonstrate that they can co-exist with the nearby freight and transport system under future development applications. This will ensure Council can appropriately manage any required buffer distances and facilitate development that is compatible with the surrounding context.</p>
3. Seeking new ways of facilitating the growth of innovative businesses	The planning proposal is consistent with the planning priority as it will enable the site to provide additional employment generating land uses that provide services and

Table 4: Consistency with the Cumberland Employment and Innovation Lands Strategy	
Planning Priority	Comment
<p>through the use of planning mechanisms and policies.</p> <p>4. Ensuring the land use planning framework for employment and innovation lands promotes innovation and target industries.</p>	<p>facilities that cater to the existing and future needs of workers and residents in the area. The proposal will allow for the co-location of health services facilities in close proximity to existing health services facilities in the area.</p> <p>This will ensure that workers and residents are provided with a range of services and facilities whilst also encouraging further employment generating uses, industries and investment in the area.</p> <p>The subject site sits adjacent to and does not form part of the Clyburn ‘Services and Innovation’ Precinct as identified within the EILS. Despite the site not being located within the Clyburn Services and Innovation Precinct the proposal does not impact on the precinct’s ability to meet the following Planning Principles and Target Activities as identified in the EILS supporting study:</p> <p><u>Planning Principles</u></p> <ul style="list-style-type: none"> • <i>Maintain functional industrial and logistic uses to support the important transport, freight and waste recycling function of the Precinct.</i> • <i>Support the evolution of the precinct to meet future employment and innovation needs for Cumberland</i> <p><u>Target Activities</u></p> <ul style="list-style-type: none"> • <i>Target continued transport and logistics/freight industries.</i> • <i>Support employment uses and businesses that can co-exist within the transport and freight environment.</i> <p>The subject site currently accommodates commercial office premises and does not contribute to industrial and logistic/freight uses within the precinct.</p> <p>The proposal will not result in the loss or encroachment of industrial land. As previously outlined, the subject site is</p>

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Table 4: Consistency with the Cumberland Employment and Innovation Lands Strategy	
Planning Priority	Comment
	<p>highly constrained and cannot facilitate industrial land use in line with the existing zoning based on its location, vehicular access, configuration and size. Since 2000, the site has been used for a variety of office purposes with no restriction to those office uses being linked to industrial development. This proposal therefore does not result in 'loss of industrial land.'</p> <p>Based on the constraints of the site it cannot accommodate industrial land uses that will support the evolution of employment and innovation lands and therefore the proposal is the most suitable way to contribute to the achievement of the planning principles and target activities. Furthermore, the proposal will co-locate additional health services facilities in close proximity to existing health services facilities in an accessible location.</p> <p>Any proposed future uses of the site will need to demonstrate that they can co-exist with the nearby freight and transport system under future development applications. This will ensure Council can appropriately manage any required buffer distances and facilitate development that is compatible with the surrounding context.</p>
<p>5. Promoting the health of employment and innovation lands in response to population growth, land use change and infrastructure provision.</p>	<p>The proposal is consistent with the planning priority as it will facilitate uses that provide employment opportunities in proximity to the Auburn Town Centre and residential zoned land. The proposal will encourage investment within the area and promote the health and viability of employment land in the area.</p> <p>The proposal will not result in the loss or encroachment of industrial land. As previously outlined, the subject site is highly constrained and cannot facilitate industrial land use in line with the existing zoning based on its location, vehicular access, configuration and size. Since 2000, the site has been used for a variety of office purposes with no restriction to those office uses being linked to industrial development.</p>

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Table 4: Consistency with the Cumberland Employment and Innovation Lands Strategy	
Planning Priority	Comment
	<p>Based on the constraints of the site it cannot accommodate industrial land uses that will support the evolution of employment and innovation lands and therefore the proposal is the most suitable way to contribute to the achievement of the planning principles and target activities.</p> <p>The proposal will provide additional services and facilities that can support the evolution of employment and innovation lands within the surrounding area.</p>

QUESTION 5 – Is the planning proposal consistent with any other applicable State and regional studies or strategies?

Future Transport 2026

The NSW Governments “*Future Transport 2056*” was released in 2018 and is an overarching strategy, supported by a suite of plans to achieve a 40-year vision for the NSW transport system. The strategy considers:

- the future road network throughout Sydney
- future light and heavy rail networks
- a future rapid bus and ferry network
- bicycle network, and
- freight network.

The proposal is considered to be generally consistent with the key objectives of the strategy as outlined in the Traffic and Parking Assessment prepared by ML Traffic (**Appendix E**) which makes the following conclusions:

- The site has excellent access to public transport options and there is available on-street parking on South Parade and a public car park located on Alice Street in proximity to the site;
- The two nearby intersections have good level of service with additional spare capacity;
- In order to provide pedestrian safety and to encourage public transport use associated with the proposed future uses of the site it is recommended that a pedestrian crossing on the western approach of South Parade is provided. This is an existing infrastructure deficiency that can be addressed under a future development application for the proposed uses onsite;
- The car parking requirements specified in the Cumberland Development Control Plan 2021 can be met onsite. The proposed car parking provisions are considered acceptable.

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- The proposed uses are expected to generate low numbers of additional trips in the AM and PM peak periods and the additional trips can be accommodated on the nearby intersections without significantly affecting the performance of any turn movements, approach arm or the overall operation of the intersection.

QUESTION 6 – Is the Planning Proposal consistent with applicable State Environmental Planning Policies?

The Planning Proposal is consistent with the relevant State Environmental Planning Policies (SEPPs) that apply to the site. A detailed list of the SEPPs and commentary is provided in the table below:

Table 5: Consistency with Relevant State Environmental Planning Policies (SEPPs)		
SEPP	Aim	Comment
SEPP (Resilience and Hazards) 2021	<p>Chapter 4 – Remediation of land</p> <p>Chapter 4 of this Policy provides a state-wide planning approach to remediation and aims to promote the remediation of any contaminated land for the purpose of reducing the risk of harm to human health and/or the environment.</p> <p>A planning authority is to consider whether the land is contaminated and if so whether it is, or can be made, suitable for the proposed land uses.</p>	<p>The subject site is not located within an investigation area and the proposal seeks the inclusion of additional permitted uses that are consistent with the existing use of the site. A Preliminary Site Investigation has been prepared by Dr Upsilon Environments Pty Ltd and is provided in Appendix I. The investigation concludes the site is considered suitable for the proposed additional permitted uses.</p>
SEPP (Industry and Employment) 2021	<p>Chapter 3 – Advertising and Signage</p> <p>The aim of this policy is to regulate signage, ensure it is of a high-quality design and finish, provides effective communication in suitable locations and is compatible with the desired visual character.</p>	<p>The planning proposal does not preclude future development on the site of complying with the SEPP. All future applications for signage and advertisement on the site will need to be consistent with the relevant provisions of this SEPP.</p>
SEPP (Transport and Infrastructure) 2021	<p>Chapter 2 – Infrastructure</p> <p>Chapter 2 of SEPP (Transport and Infrastructure) 2021 aims to identify matters to be considered in the assessment of development adjacent to types of infrastructure development</p>	<p>The Planning Proposal is consistent with Chapter 2 of the SEPP as it will not adversely impact on any existing or future infrastructure onsite or within the surrounding area. A Traffic and Parking</p>

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Table 5: Consistency with Relevant State Environmental Planning Policies (SEPPs)		
SEPP	Aim	Comment
		Assessment has been prepared by ML Traffic and is provided in Appendix F . The report concludes that the planning proposal is acceptable from a traffic and parking perspective and future development applications for the site will result in improved pedestrian infrastructure.
SEPP (Biodiversity and Conservation) 2021	Chapter 6 – Water Catchments Chapter 6 of SEPP (Biodiversity and Conservation) 2021 aims to ensure that the catchment, foreshores, waterways and islands of Sydney Harbour are recognised, protected, enhanced and maintained.	Any future development will include appropriate stormwater management systems that are designed to ensure there are no adverse on the Sydney Harbour catchment area. The proposal is therefore not inconsistent with Chapter 6 of the SEPP.
SEPP (Exempt and Complying Codes) 2008	The aims of this policy are to provide exempt and complying development codes that have State-wide application.	The Planning Proposal is not inconsistent with this SEPP which would apply to future development.

QUESTION 7 – Is the Planning Proposal consistent with applicable Ministerial Directions (s9.1 directions)?

The Planning Proposal is generally consistent with the applicable Section 9.1 directions issued by the Minister for Planning. A statement of the consistency of this Planning Proposal with the relevant directions to this planning proposal is provided in the table below:

Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
Focus Area 1 – Planning Systems		
1.1 Implementation	Planning proposals must be consistent with a Regional Plan released by the Minister for Planning.	The proposal is consistent with this direction as it is consistent with the

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Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
of Regional Plans		Greater Sydney Region Plan as detailed above.
1.4 Site Specific Provisions	<p>(1) A planning proposal that will amend another environmental planning instrument in order to allow particular development to be carried out must either:</p> <p>(a) allow that land use to be carried out in the zone the land is situated on, or</p> <p>(b) rezone the site to an existing zone already in the environmental planning instrument that allows that land use without imposing any development standards or requirements in addition to those already contained in that zone, or</p> <p>(c) allow that land use on the relevant land without imposing any development standards or requirements in addition to those already contained in the principal environmental planning instrument being amended.</p> <p>(2) A planning proposal must not contain or refer to drawings that show details of the proposed development.</p> <p>A planning proposal may be inconsistent with the terms of this direction only if the relevant planning authority can satisfy the Planning Secretary (or an officer of the Department nominated by the Secretary) that the provisions of the planning proposal that are inconsistent are of minor significance.</p>	<p>The planning proposal to amend the Cumberland Local Environmental Plan (LEP) 2021 to include additional permitted uses of medical centres and office premises. The planning proposal will provide a site-specific provision for the site allowing the additional permitted uses of medical centres and office premises whilst maintaining the industrial zoning of the site and is therefore inconsistent with this direction.</p>

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Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
		<p>The subject site is currently zoned E4 General Industrial under the provisions of the Cumberland LEP 2021. Medical centres and office premises are prohibited in the E4 General Industrial zone. The site is bound by the Main Suburban Railway to the north and represents a small portion of industrial zoned land surrounding by R3 Medium Density Residential and E1 local centre zoning reflected by its proximity to the Auburn Town Centre.</p> <p>The site has not been utilised for industrial purposes for an extended period of time and has accommodated commercial uses consistent with the site’s location in proximity to the Auburn Town Centre. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre representing a unique opportunity to facilitate further health services facilities and office premises in an accessible location.</p> <p>The site-specific provision relating to the site is of minor significance as the additional permitted uses are generally consistent with the existing use of the site as approved under DA249/00 and will provide additional services and facilities that positively contribute to the vitality and viability of the nearby Auburn Town Centre whilst not impeding on the operation of the adjacent industrial uses or freight network.</p>
Focus Area 4 – Resilience and Hazards		

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Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
4.4 Remediation of Contaminated Land	<p>(1) A planning proposal authority must not include in a particular zone (within the meaning of the local environmental plan) any land to which this direction applies if the inclusion of the land in that zone would permit a change of use of the land, unless:</p> <ul style="list-style-type: none"> (a) the planning proposal authority has considered whether the land is contaminated, and (b) if the land is contaminated, the planning proposal authority is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for all the purposes for which land in the zone concerned is permitted to be used, and (c) if the land requires remediation to be made suitable for any purpose for which land in that zone is permitted to be used, the planning proposal authority is satisfied that the land will be so remediated before the land is used for that purpose. <p>In order to satisfy itself as to paragraph 1(c), the planning proposal authority may need to include certain provisions in the local environmental plan.</p> <p>(2) Before including any land to which this direction applies in a particular zone, the planning proposal authority is to obtain and have regard to a report specifying the findings of a preliminary investigation of the land carried out in accordance with the contaminated land planning guidelines.</p>	<p>The subject site is not located within an investigation area and the proposal seeks the inclusion of additional permitted uses that are consistent with the existing use of the site. A Preliminary Site Investigation has been prepared by Dr Upsilon Environments Pty Ltd and is provided in Appendix I. The investigation concludes the site is considered suitable for the proposed additional permitted uses.</p>

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Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
Focus Area 5 – Transport and Infrastructure		
5.1 Integrating Land Use and Transport	<p>(1) A planning proposal must locate zones for urban purposes and include provisions that give effect to and are consistent with the aims, objectives and principles of:</p> <ul style="list-style-type: none"> (a) Improving Transport Choice – Guidelines for planning and development (DUAP 2001), and (b) The Right Place for Business and Services – Planning Policy (DUAP 2001). 	<p>The Planning Proposal is consistent with the direction as it will facilitate future employment generating land uses in an accessible location that will not adversely impact on the existing or future transport network.</p> <p>Ministerial Direction 5.1 states the following:</p> <p><u>Objectives</u></p> <p><i>The objective of this direction is to ensure that urban structures, building forms, land use locations, development designs, subdivision and street layouts achieve the following planning objectives:</i></p> <ul style="list-style-type: none"> <i>(a) improving access to housing, jobs and services by walking, cycling and public transport, and</i> <i>(b) increasing the choice of available transport and reducing dependence on cars, and</i> <i>(c) reducing travel demand including the number of trips generated by development and the distances travelled, especially by car, and</i> <i>(d) supporting the efficient and viable operation of public transport services, and</i> <i>(e) providing for the efficient movement of freight.</i> <p><u>Direction 5.1</u></p> <p><i>A planning proposal must locate zones for urban purposes and include</i></p>

Planning Proposal – 25 South Parade, Auburn

Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
		<p><i>provisions that give effect to and are consistent with the aims, objectives and principles of:</i></p> <p><i>(a) Improving Transport Choice – Guidelines for planning and development (DUAP 2001), and</i></p> <p><i>(b) The Right Place for Business and Services – Planning Policy (DUAP 2001).</i></p> <p>The EILS Study states the following in relation to consideration of the Key Freight Transport Accessibility Map:</p> <p><i>Employment and innovation lands located near these key freight routes should be buffered from sensitive uses, nurtured and allowed to prosper.</i></p> <p><i>Council should be satisfied that any planning proposals in the areas surrounding the employment and innovation lands along key freight routes should not preclude the continued use of those routes for freight.</i></p> <p>The subject site currently accommodates commercial office premises and does not contribute to industrial and logistic/freight uses within the precinct.</p> <p>Based on the constraints of the site it cannot accommodate industrial land uses that will support freight industries and the existing commercial use of the site does not impact on the continued use of the key routes for freight.</p> <p>The proposal will facilitate further employment generating land uses and services in close proximity to the Auburn Town Centre and existing residential</p>

Planning Proposal – 25 South Parade, Auburn

Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
		<p>areas without impacting on the street network thus achieving the objectives of Direction 5.1.</p> <p>The proposal is therefore consistent with the Direction as it will facilitate uses that minimise the impact on the surrounding transport network whilst providing employment and services within close proximity to existing residential areas and the Auburn Town Centre.</p> <p>A Traffic and Parking Assessment has been prepared by ML Traffic in support of the proposal and is provided in Appendix E. The report makes the following conclusions:</p> <ul style="list-style-type: none"> • The site has excellent access to public transport options and there is available on-street parking on South Parade and a public car park located on Alice Street in proximity to the site; • The two nearby intersections have good level of service with additional spare capacity; • In order to provide pedestrian safety and to encourage public transport use associated with the proposed future uses of the site it is recommended that a pedestrian crossing on the western approach of South Parade is provided. This is an existing infrastructure deficiency that can be addressed under a future development application for the proposed uses onsite; • The car parking requirements specified in the Cumberland

Planning Proposal – 25 South Parade, Auburn

Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
		<p>Development Control Plan 2021 can be met onsite. The proposed car parking provisions are considered acceptable.</p> <ul style="list-style-type: none"> The proposed uses are expected to generate low numbers of additional trips in the AM and PM peak periods and the additional trips can be accommodated on the nearby intersections without significantly affecting the performance of any turn movements, approach arm or the overall operation of the intersection.
Focus Area 7 – Industry and Employment		
7.1 – Business and Industrial Zones	<p>(1) A planning proposal must:</p> <p>a) give effect to the objectives of this direction,</p> <p>b) retain the areas and locations of existing business and industrial zones,</p> <p>c) not reduce the total potential floor space area for employment uses and related public services in business zones,</p> <p>d) not reduce the total potential floor space area for industrial uses in industrial zones, and</p>	<p>The planning proposal is consistent with this direction as follows:</p> <p>The proposal will encourage employment growth in a suitable area, protects employment land in business and industrial zones and supports the viability of nearby identified centres.</p> <p>The proposal will facilitate additional uses that are consistent with existing uses in the area.</p> <p>The proposal does not reduce the total potential floor space area for employment uses and related public services in business zones.</p> <p>The proposal does not reduce the total potential floor space area for industrial uses as the existing building has never been utilised for industrial purposes thus the proposal will not result in the loss or</p>

Planning Proposal – 25 South Parade, Auburn

Table 6: Consistency with Relevant Section 9.1 Ministerial Directions		
Direction	Requirement	Comment
	e) ensure that proposed new employment areas are in accordance with a strategy that is approved by the Planning Secretary.	<p>encroachment of existing or potential industrial floor space.</p> <p>The proposed use of the site is consistent with the relevant strategic planning framework applicable to the site and area as identified within this response and the documentation submitted with the proposal.</p> <p>The proposal will not result in the loss or encroachment of industrial land. As previously outlined, the subject site is highly constrained and cannot facilitate industrial land use in line with the existing zoning based on its location, vehicular access, configuration and size. Since 2000, the site has been used for a variety of office purposes with no restriction to those office uses being linked to industrial development. This proposal therefore does not result in 'loss of industrial land.'</p> <p>The proposal will allow for the continued use of the site to provide key services and facilities for workers and residents in the area without impacting on functioning industrial land or uses.</p>

C. ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT

QUESTION 8 – Is there any likelihood that critical habitat or threatened species, populations or ecological communities, or their habitats, will be adversely affected as a result of the proposal?

Ecological Impacts

The planning proposal seeks facilitate the future use of the site for the purposes of medical centre and office premises uses. The future uses of the site will be located on an existing disturbed site and will not

Planning Proposal – 25 South Parade, Auburn

require the removal of any existing vegetation in the area and therefore will not have any adverse ecological impacts on the site or surrounding area.

QUESTION 9 – Are there any other likely environmental effects as a result of the Planning Proposal and how are they proposed to be managed?

Built Form and Context

An Urban Design and Massing Design Study has been prepared by Architectus (**Appendix F**) in support of the proposal which undertakes an assessment of the urban design impacts of the proposal and potential massing scenarios to inform the best fit maximum building height for the site based on the relevant provisions of the Cumberland LEP and DCP applying to the site.

It is proposed that any development on the site be in keeping with the height and bulk of the majority existing and potential future developments on surrounding sites. It is noted that the current height control on the residential area to the southwest is 9 metres and that the existing medium density residential development immediately west of the site surpasses this by around 2 metres (4 storeys of 2.7 metres floor-to-floor). For the purposes of this urban design and massing study, 9 metres and 11 metres shall be considered the lower and upper bounds for a height control that produces development on the site that is in keeping with its immediate context.

Massing scenario 1 - 9 metre height control

The first massing scenario presented provides 1,600m² of Gross Floor Area (GFA) within a building envelope of 850m² GBA over two floors generally towards the eastern half of the site. The building is approximately 55.5 metres long and is 19.4 metres wide at its widest point, tapering to 13.8 metres at its western end (set out in line with the larger rail building to its rear) and 5.4 metres at its eastern end. The building height is at or below 9.0 metres over the natural ground plane at all points.

The building envelope complies with the 5 metre front setback zone, though providing nil setbacks to the rear and east side boundaries. A nominal roof plant area is accommodated over the eastern half of the building envelope. Both the main building envelope and the roof plant area are pushed towards the east so that as the ground slopes down towards the west, the building remains below a 9 metre height plane, most critically at the western elevation where the parapet height of RL+30.95 remains just within 9 metres above the RL+22.00 site contour. This is based on typical floor-to-ceiling and floor-to-floor allowances for the proposed additional uses.

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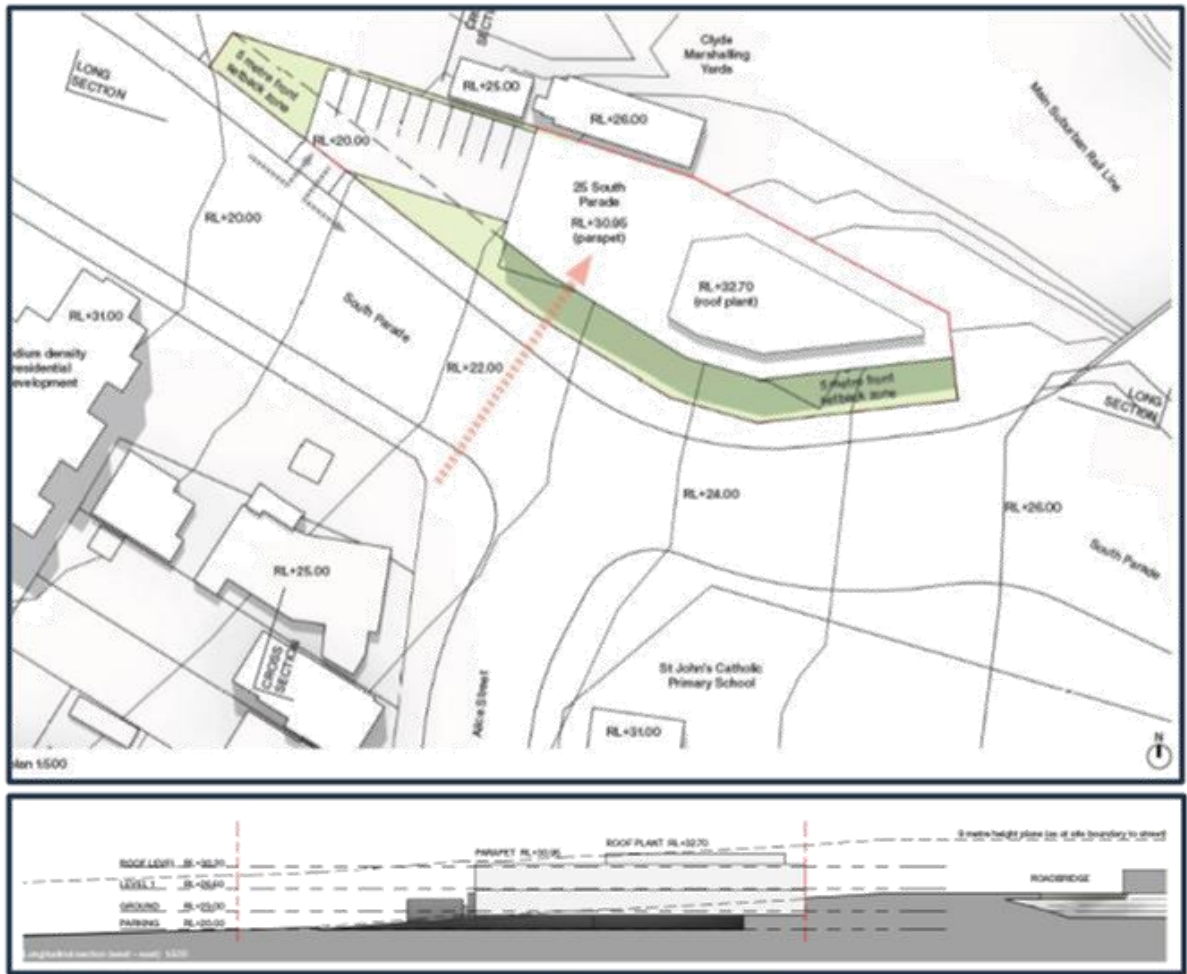


Figure 9: 9m massing scenario site plan and elevation (Source: Architectus)

Planning Proposal – 25 South Parade, Auburn

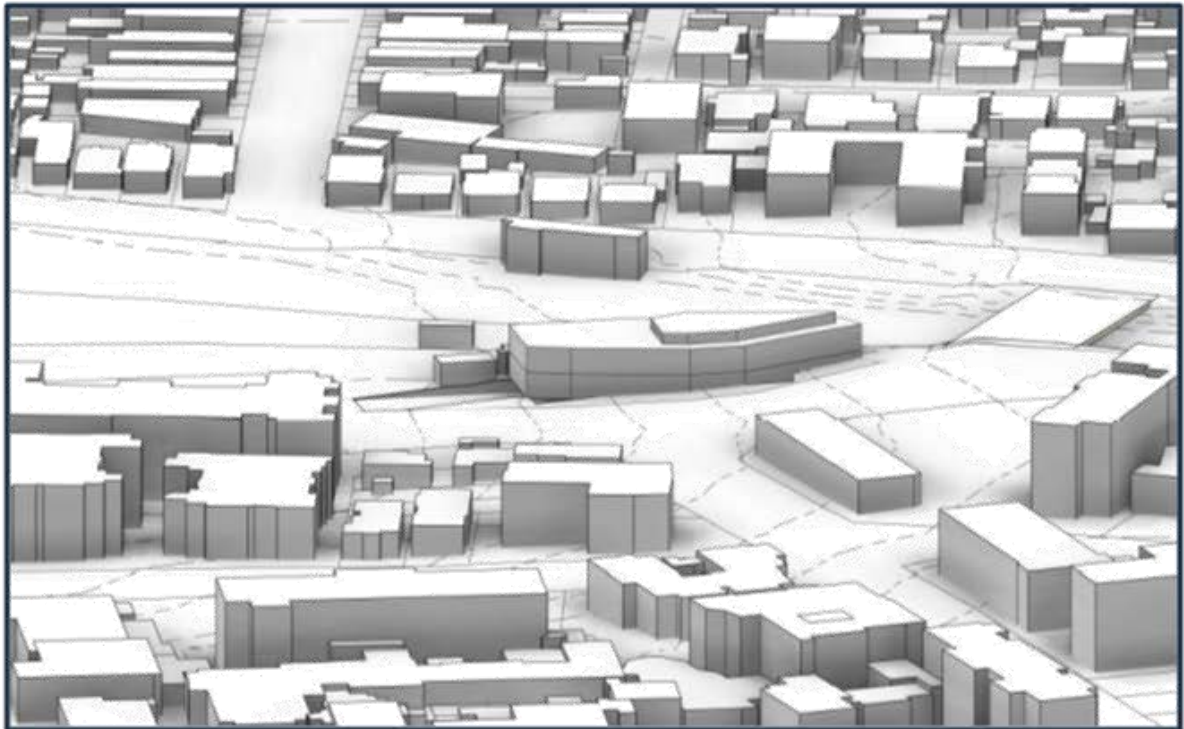


Figure 10: 9m massing scenario 3D view (Source: Architectus)

Massing scenario 2 - 11 metre height control

The first massing scenario presented above complied with all existing development controls and the lower bound of potential height controls under consideration. However, by providing nil setbacks to the rear and east side boundaries, it produces a compromised experience for occupants of the building and creates challenges for excavation and construction along these boundaries.

The second massing scenario here considers a slight relaxation of the height control to 11 metres. This allows the building footprint to expand westward even as the ground slopes down towards the west, thus allowing setbacks of 1.5 metres along the rear and east side boundaries. These setbacks afford daylighting and natural ventilation opportunities to the northern facade of the building as well as an allowance for screening and other devices to calibrate those opportunities.

This provides a much-improved experience for occupants at the cost of only negligible to minor impacts to the bulk of the building and on the precinct. Like the first scenario, this second scenario provides 1,600m² of GFA within a building envelope of 850m² GBA over two floors. The building is approximately 65.5 metres long and is 17.9 metres wide at its widest point, tapering to 8.3 metres at its western end (set out in line with the smaller rail building to its rear) and 4.6 metres at its eastern end. The building height is at or below 11.0 metres over the natural ground plane at all points. This is based on typical floor-to-ceiling and floor-to-floor allowances for the proposed additional uses. Levels of each structural floor are the same as in the first massing scenario.

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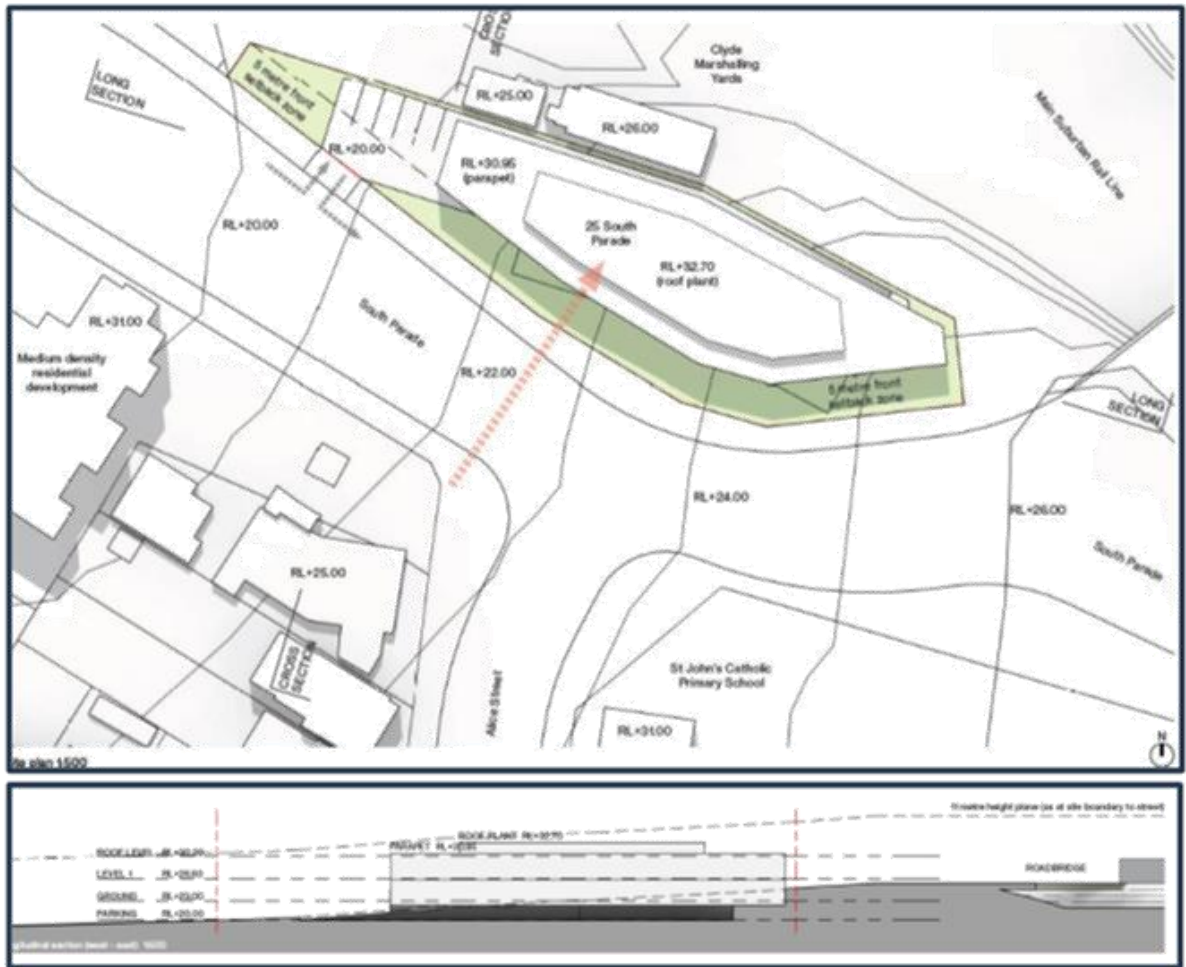


Figure 11: 11m massing scenario site plan and elevation (Source: Architectus)

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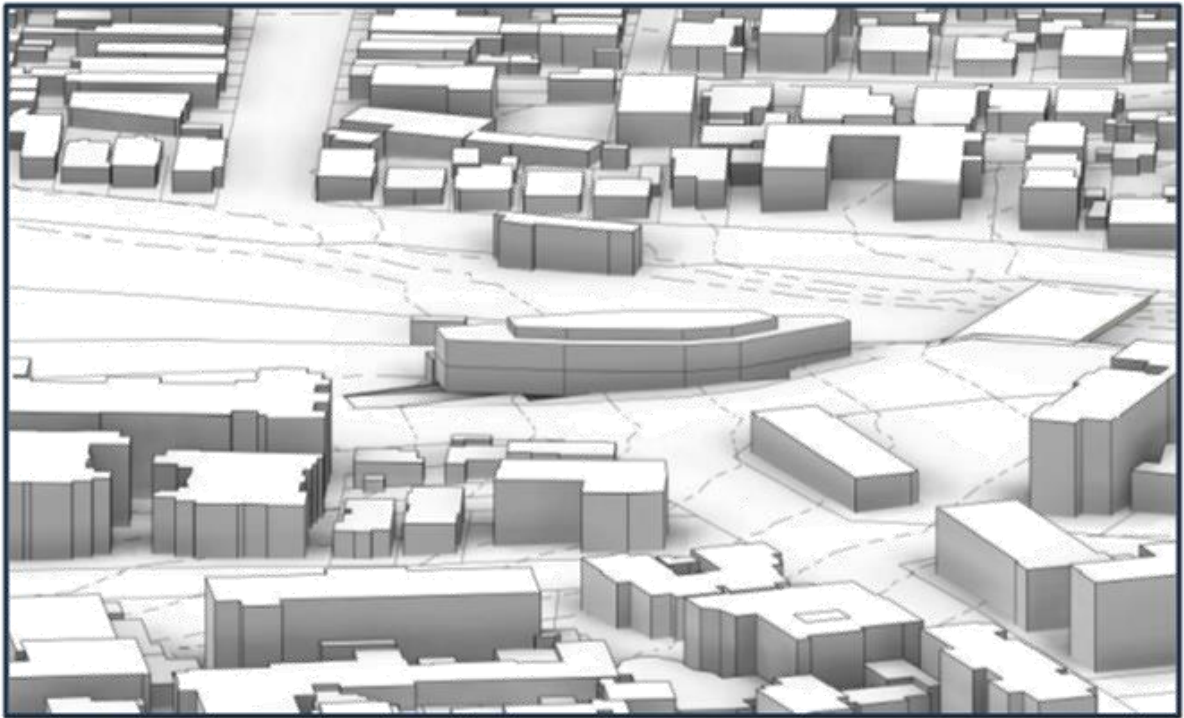


Figure 12: 11m massing scenario 3D view (Source: Architectus)

Summary

The massing scenarios presented above demonstrate that the proposed additional uses of medical centre and office premises may be accommodated on the site to the full floor space allowance of the LEP, and in compliance with existing LEP and Development Control Plan (DCP) controls. Despite challenges accommodating the minimum car parking requirements of the DCP for the proposed additional uses within the site's narrow, tapering geometry, a satisfactory urban design outcome can be achieved by providing deep soil soft landscaping over and above the minimum required by the DCP, within the front setback zone where it can be seen and enjoyed by surrounding occupants and passersby as well.

Consideration of building envelopes providing the floor space allowable under LEP and conforming to height controls of either 9 or 11 metres identifies that both height controls produce building envelopes with very similar and satisfactory outcomes for the precinct.

However, compared to the height control of 9 metres, the height control of 11 metres produces a building envelope with significantly superior architectural outcomes in terms of daylighting and natural ventilation, occupant experience, sustainability, constructability, and civil engineering impacts.

As a result, the proposal seeks to amend the Cumberland LEP to include a maximum building control of 11m for the site.

Acoustic Impacts

Planning Proposal – 25 South Parade, Auburn

An Acoustic Assessment has been prepared by Koikas Acoustics in support of the proposal and is provided in **Appendix C**. The assessment concludes that the proposal does not present an issue from an acoustical perspective and is likely to improve acoustic amenity for neighbouring land uses based on the following conclusions:

- Commercial building of this nature has substantially less potential for noise breakout compared to an industrial facility. Commercial activities associated with offices, medical centres and associated noise are typically well contained within the building's external envelope.

Furthermore, the majority of office premises are generally low noise environments. The only external noise generating source will be the mechanical plant and equipment required to service the building which is presumed to be largely existing. Comparatively speaking, industrial premises will typically offer several means for noise breakout such as from noisy works occurring in outdoor areas with semi-open workspaces, as well as from the mechanical plant and equipment required to service the building.

- Office premises will typically have more limited hours of operation and the building would rarely be used during early morning hours. This eliminates a major source of potential noise complaints, being early-morning noise generation.
- The subject site is located on a major railway corridor and main road. Due to the more stringent internal noise criteria associated with external noise intrusion for commercial spaces as opposed to industrial, the building may require additional noise attenuation measures to ensure compliance is achieved. This will be pending an additional noise intrusion assessment as the existing building may already be constructed to meet the relevant regulatory standards.

For the above reasons the Planning Proposal does not present an issue from an acoustical perspective and is likely to improve acoustic amenity for neighbouring land uses. The only foreseeable source of potential noise generation would be from the mechanical plant and equipment required to service the building, of which we would expect a suitable condition of consent to accompany any forthcoming Development Application (DA) for the proposed uses.

Traffic and Access

A Traffic and Parking Assessment has been prepared by ML Traffic in support of the proposal and is provided in **Appendix E**. The assessment includes a review of the following:

- Background and existing traffic and parking conditions of the site;
- Assessment of the public transport network within the vicinity of the site;
- Adequacy of car, bicycle and motorcycle parking provision;
- The projected traffic generation of the proposed use of the site;
- The transport impact of the proposed use of the site on the surrounding road network.

Public Transport and Pedestrian Network

Planning Proposal – 25 South Parade, Auburn

The nearest bus stop is located less than 150m from the site on Queen Street which is serviced by bus route 908. The bus route provides transport to the surrounding suburbs of Yagoona, Birrong, Berala, Auburn, Merrylands, Guilford and South Granville. Auburn Train Station and Bus Interchange is located approximately 350m from the site. Overall, the site has excellent access to public transport.

There are no existing pedestrian crossings on South Parade at the signalized intersection of South Parade and Alice Street directly outside of the subject site. Transport for NSW current policy on building new signalised intersections is to provide pedestrian crossings.

In order to provide pedestrian safety and to encourage public transport use associated with the proposed future uses of the site it is recommended that a pedestrian crossing on the western approach of South Parade is provided. The provision of a pedestrian crossing on South Parade can be assessed and undertaken as part of any future Development Application for the site once the Planning Proposal is determined.

Traffic Assessment

A Traffic Assessment was undertaken for the nearby intersections and surrounding road network. The assessment concluded that the existing intersections and surrounding road network in proximity to the site are currently operating at a good condition and has sufficient capacity to accommodate additional traffic associated with the proposed future uses onsite. The proposal will therefore have an acceptable impact on traffic volumes in the area.

Parking Assessment

The site currently has 22 at grade car parking spaces. Based on the proposed future uses and the existing floorspace of the building onsite the car parking requirements of the Cumberland Development Control Plan (DCP) 2021 can be met onsite under future development applications once the planning proposal is determined.

The planning proposal is therefore considered acceptable from a traffic and parking perspective. Future development applications on the site will result in improved pedestrian safety for the site and surrounding area.

Heritage

A Heritage Assessment has been prepared by Touring the Past in support of the proposal and is provided in **Appendix H**. The assessment states that the proposal is restricted to the provision of new permitted uses under the current zoning overlay at the place. No physical intervention, including sub-surface disruption, is proposed and concludes that the planning proposal is supportable from a heritage impact perspective.

QUESTION 10 – Has the Planning Proposal adequately addressed any social and economic effects?

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Economic Impacts

An Economic Impact Assessment has been prepared in support of the proposal by Hill PDA and is provided in **Appendix D**.

The planning proposal seeks facilitate the future use of the site for the purposes of medical centre and office premises uses. On 6 September 2000 development consent was issued by Council for the Construction of an office building and associated car parking area under **DA249/00**.

The building that was approved, and has since been constructed and occupied, is a two level commercial office building of around 860sqm GFA with around 22 outside car parking spaces. At the time of lodgement of the original DA in 2000 the land was zoned Special Uses (Railway) under the Auburn Planning Scheme.

The land was also affected by a draft Industrial 4(a) zone under a Draft LEP which would prohibit commercial office development.

Notwithstanding the draft industrial zone, Council's assessment report in 2000 noted some negative aspects to industrial use of the site namely:

The shallow depth of the land is not conducive to industrial development and could result in a proposal for a factory facing onto the street with parking at the western end of the site. Such a proposal would likely have industrial access points in reasonable proximity to the Alice Street traffic lights and road bridge over the railway lines.

Industrial development on the opposite side of the road to future residential flats is not desirable. The proposal for an office development is considered to be more compatible with the nearby residential uses.

The report also noted that the "site is within easy walking distance to Auburn Railway station and business area. Accordingly, the site is considered to be suitable for office development."

The site is on the fringe of the Auburn Town Centre immediately west of the E1 Local Centre zone on the other side of South Parade and around 350m from Auburn Station. The approved and existing use of the site for commercial offices compliments the general strategic principles under the regional and district plans of land use and transport integration – namely promoting higher density employment and living spaces within walking distance of major public transport infrastructure.

In terms of economic impacts in the locality the planning proposal will have no discernible impact. This is because the existing building is a commercial office building. It enjoys existing use rights and the planning proposal simply 'legitimises' these existing land uses.

The planning proposal seeks to include office premises and medical centres as permissible uses on the subject site within the industrial zone.

Planning Proposal – 25 South Parade, Auburn

The base case is not redevelopment or change of use to an alternative conforming use such as warehousing, manufacturing, wholesale business or industrial/urban services of some sort. This is because the existing building on the site, which is less than 20 years old, is already the highest and best use of the site. It is simply not financially viable to demolish or convert the building to a conforming use, at great capital expense, which would result in a lower level of net rental income. Office space in that location will pay a higher rent than industrial use and the existing building with existing use rights allows that realisation. At no point in the foreseeable future will it be viable to redevelop the site to some conforming industrial use.

Hence the base case is occupation of the existing building for commercial purposes which could also include medical services.

There are various sources of data to estimate jobs on site. City of Sydney Employment and Floor Space Survey 2017 shows an average of 16sqm (GLA) of office space per worker although the density can be higher at 10sqm for open plan offices. Medical services have a lower employment density of around 23sqm to 30sqm. Given these numbers we would expect around 30 to 40 workers on site. This number is expected under both the base case (do nothing) and under the planning proposal (amendment to the LEP).

Therefore, the proposal will not result in any adverse economic impacts on the area or nearby Auburn Town Centre and will facilitate the use of the site for purposes that recognise the highest and best use of the site.

The proposal will provide ancillary land uses that positively contribute to the Auburn Town Centre and existing health services facilities that are located in close proximity to the site.

Social Impacts

The planning proposal will result in a number of positive social impacts on the surrounding area through the activation of an underutilized site for land uses that positively contribute to the vitality and viability of the Auburn Town Centre and nearby health services facilities.

The site has not been utilised for industrial purposes for an extended period of time and has accommodated commercial uses consistent with the site's location in proximity to the Auburn Town Centre. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre representing a unique opportunity to facilitate further health services facilities and office premises in an accessible location providing services and facilities for both workers and residents in the area.

A Social Impact Comment has been prepared by Hill PDA in support of the proposal and is provided in **Appendix G**. The report makes the following conclusions:

- The Planning Proposal is likely to have very limited impacts on ways of life in terms of noise and traffic.
- The Planning Proposal is likely to benefit both community cohesion and development, by supporting local access to potential employment and services.

Planning Proposal – 25 South Parade, Auburn

- The Planning Proposal would likely improve access to jobs in the local area.
- The Planning Proposal is unlikely to impact local culture due to any heritage implications. Simultaneously, the site may make a positive cultural contribution to the area, and to Auburn town centre in particular by increasing the range of uses that would be permissible on the site
- The Planning Proposal is likely to have a positive impact in terms of health and wellbeing, helping to expand the potential provision of local health services while supporting convenient employment opportunities for local residents
- The Planning Proposal does not involve any changes to built form; it therefore does not risk impacting local character in this way. At the same time, the site may strengthen its surroundings by providing ancillary services that could benefit wider industrial lands, as well as Auburn town centre and nearby residents
- The Planning Proposal would support a greater range of potential development on the site than what is currently possible, thus presenting a possible benefit for livelihoods in the area.

Overall, the research presented in this document raises no significant concern of potential negative social impact to arise from the planning proposal. The planning proposal may result in positive social outcomes through increased provision of health services and employment opportunities.

D. INFRASTRUCTURE (LOCAL, STATE AND COMMONWEALTH)

QUESTION 11 - Is there adequate public infrastructure for the Planning Proposal?

The subject site is within an established urban area currently serviced by adequate water, sewer and electricity infrastructure which can be upgraded for future development. The site is close to a variety of public transport connections.

The Traffic, Transport and Parking Assessment, prepared by ML Traffic, confirms that the proposed increase in traffic is negligible and is not envisaged to affect the existing surrounding traffic network.

QUESTION 12 - What are the views of state and Commonwealth public authorities consulted in accordance with the Gateway determination?

Consultation with relevant State and Commonwealth public authorities will be undertaken as part of the exhibition of the Planning Proposal, as directed by the Gateway Determination. In this regard, consultation with the following public authorities is anticipated:

- Sydney Water
- Ausgrid
- Transport for NSW

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PART 4 – Mapping

As discussed in Part 2 of this report the Planning Proposal seeks to amend the Cumberland LEP 2021 as follows:

- Amending the Cumberland LEP 2021 Additional Permitted Uses Map for the subject site (Sheet APU_012) to identify the site for additional permitted uses referenced in Schedule 1 of the LEP.
- Amending Schedule 1 of the Cumberland LEP 2021 – to include a provision relating to the subject site that would permit development for the purposes of medical centre and office premises.
- Amending the Cumberland LEP 2021 Height of Buildings Map for the subject site (Sheet HOB_012) to identify a maximum building height of 11m.

Thumbnail mapping of the above intended outcomes is provided below.

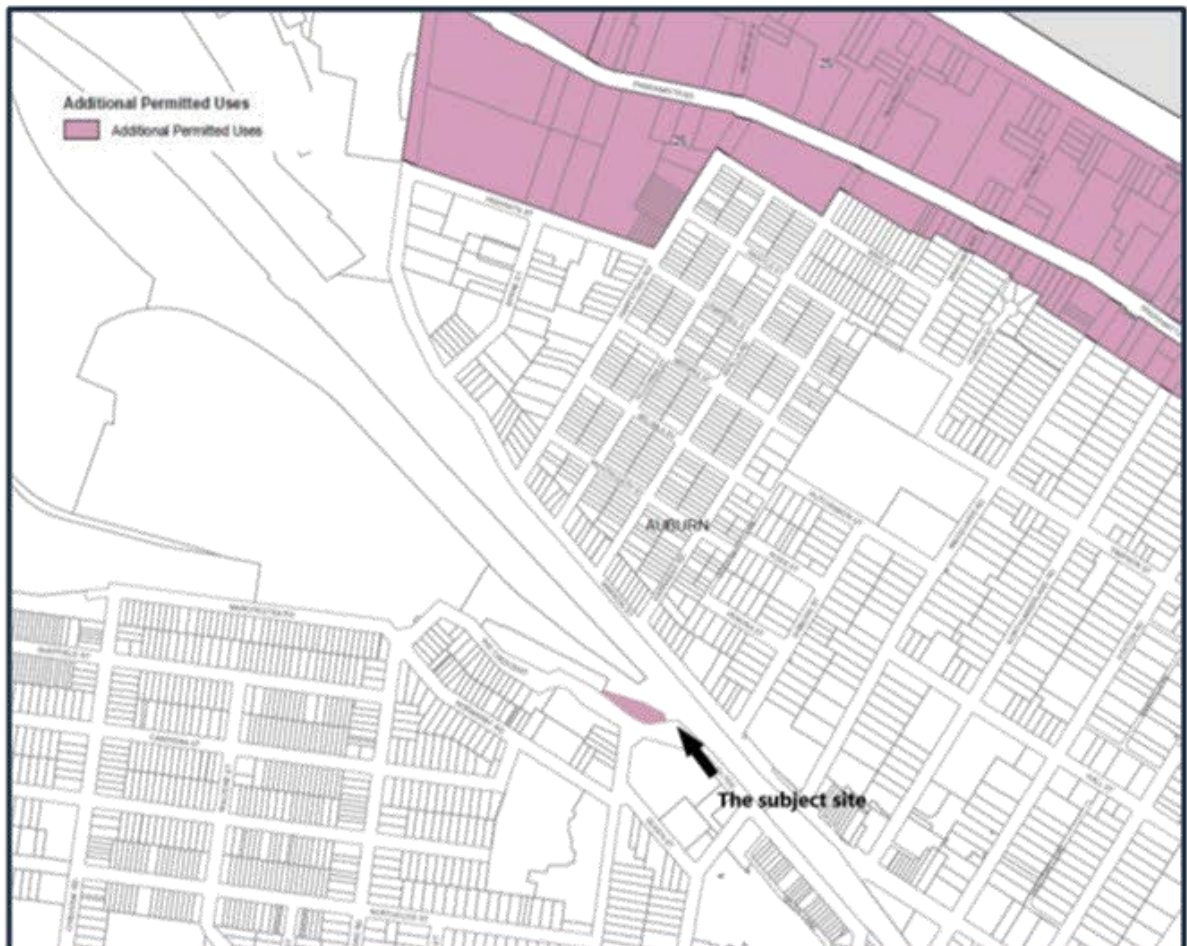


Figure 13: Proposed Additional Permitted Uses Map

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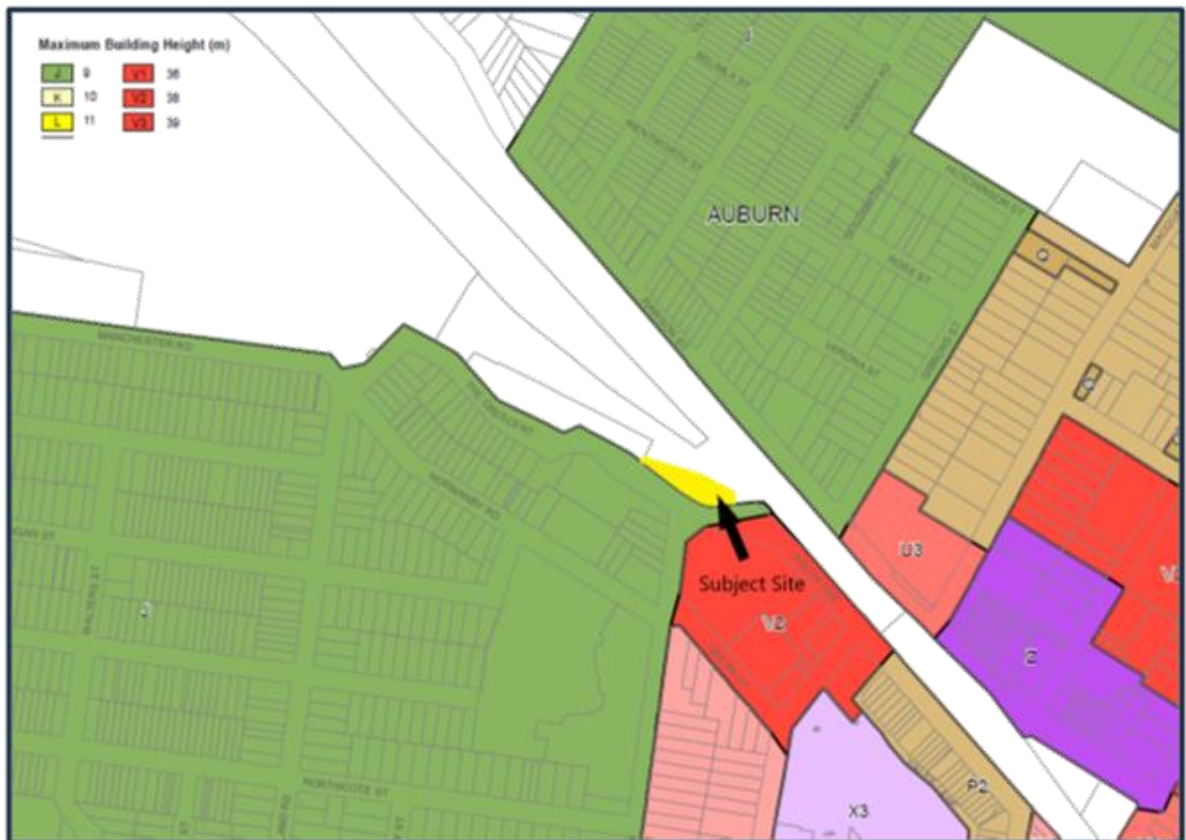


Figure 14: Proposed Maximum Building Height Map

The required mapping will be undertaken by Council once Gateway Determination has been issued for the proposal.

PART 5 – Community and Key Stakeholder Consultation

Community consultation would take place following a Gateway determination, in accordance with Section 3.34 and Schedule 1, Clause 4 of the *Environmental Planning and Assessment Act 1979*.

It is expected that direction as to the nature and extent of the public exhibition will be provided by Department of Planning and Environment as part of the Gateway Determination. It is anticipated that the Planning Proposal will be publicly exhibited for a period of 28 days.

PART 6 – Project Timeline

The Relevant Planning Authority (RPA) has discretion to determine the relevant project timeframe for the determination of this Planning Proposal. The information detailed within this Planning Proposal has been provided to outline any potential impacts and provide justification to support and assist the RPA's determination.

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Table 6: Anticipated Project Timeline	
Stage	Timeframe
Stage 1 – Pre-Lodgement	30 Days (complete)
Stage 2 – Lodgement of Planning Proposal & Assessment by Council	80 days (partially complete)
Stage 3 - Gateway determination	25 days
Stage 4 – Post-Gateway	20 days
Stage 5 – Public Exhibition and Assessment	70 days
Stage 6 - Finalisation	25 days
Total (end to end)	250 days



APPENDIX A

PRE-LODGEMENT CONSULTATION RESPONSE COMPLIANCE TABLE

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In accordance with the Department of Planning & Environment Guidelines for preparing Planning Proposals, a pre-lodgement meeting was held with Cumberland Council staff on the 23 February 2022 to discuss the intent of the Planning Proposal and confirm the relevant specialist studies to be prepared in support of the Planning Proposal.

A response to the key items raised by Council is detailed in the table below.

Pre-Lodgement Consultation Compliance Table 25 South Parade, Auburn		
Development Component	Pre-Lodgement Comment	Response
Strategic and Site-based Merit	<p>In determining the strategic and site-based merit of the proposal, consideration must be given to the suitability of the proposed new uses in the context of:</p> <p>The E4 zone objectives, which are to:</p> <ul style="list-style-type: none"> To provide a range of industrial, warehouse, logistics and related land uses. To ensure the efficient and viable use of land for industrial uses. To minimise any adverse effect of industry on other land uses. To encourage employment opportunities. To enable limited non-industrial land uses that provide facilities and services to meet the needs of businesses and workers. 	<p>The planning proposal seeks to include the additional permitted uses of medical centres and office premises on the site. The proposed additional permitted uses are consistent with the relevant objectives of the E4 General Industrial zone under the Cumberland LEP 2021 as follows:</p> <ul style="list-style-type: none"> Based on the location and characteristics of the site the uses will not impede on the ability for adjoining industrial land to be accommodate a wide range of industrial, warehouse and logistics land uses; The proposed uses ensure the efficient and viable use of the site; The proposed uses will provide a range of employment opportunities for the community; Based on the location and characteristics of the site the uses proposed will not adversely impact on surrounding land uses; and The proposed uses will facilities or services to meet the day to day needs of workers and residents in the area.

Pre-Lodgement Consultation Compliance Table – 25 South Parade, Auburn

	<p>The location of the site – We note that the site’s location presents certain challenges that would need to be addressed as part of any planning proposal. In particular, we note that the site is located on the outskirts of the Auburn Town Centre, on a busy corner with poor pedestrian and vehicular access. We also note that it may be necessary to limit the gross floor area for the proposed additional permitted uses, particularly the proposed office premises and business premises.</p>	<p>The rationale for the planning proposal is to facilitate the future use of the site for the purposes of a medical centre and office premises that are consistent with development in the surrounding area and the surrounding context based on the site’s proximity to the Auburn Town Centre.</p> <p>The site has not been utilised for industrial purposes for an extended period of time and has accommodated commercial uses consistent with the site’s location in proximity to the Auburn Town Centre. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre representing a unique opportunity to facilitate further medical centre and office premises in an accessible location.</p> <p>A Traffic and Parking Assessment has been prepared by ML Traffic in support of the proposal and is provided in Appendix E. The assessment includes a review of the following:</p> <ul style="list-style-type: none"> • Background and existing traffic and parking conditions of the site; • Assessment of the public transport network within the vicinity of the site; • Adequacy of car, bicycle and motorcycle parking provision; • The projected traffic generation of the proposed use of the site; • The transport impact of the proposed use of the site on the surrounding road network. <p>The report makes the following conclusions:</p>
--	---	---

Pre-Lodgement Consultation Compliance Table – 25 South Parade, Auburn

		<ul style="list-style-type: none"> • The site has excellent access to public transport options and there is available on-street parking on South Parade and a public car park located on Alice Street in proximity to the site; • The two nearby intersections have good level of service with additional spare capacity; • In order to provide pedestrian safety and to encourage public transport use associated with the proposed future uses of the site it is recommended that a pedestrian crossing on the western approach of South Parade is provided. This is an existing infrastructure deficiency that can be addressed under a future development application for the proposed uses onsite; • The car parking requirements specified in the Cumberland Development Control Plan 2021 can be met onsite. The proposed car parking provisions are considered acceptable. • The proposed uses are expected to generate low numbers of additional trips in the AM and PM peak periods and the additional trips can be accommodated on the nearby intersections without significantly affecting the performance of any turn movements, approach arm or the overall operation of the intersection. <p>The planning proposal is therefore considered acceptable from a traffic and parking perspective. Future development applications on the site will result in improved pedestrian safety for the site and surrounding area.</p>
<p>Justification</p>	<p>Any planning proposal lodged for the site will need to adequately justify the proposal, including answers to the following questions:</p> <ul style="list-style-type: none"> • Is there a need for the proposal, or can the site be reasonably developed under existing controls? 	<p>The project objective and intended outcome for the planning proposal is to facilitate the future use of the site for the purposes of medical centres and office premises through the amendment of the Cumberland LEP 2021 to include additional permitted uses that are consistent with development in the surrounding area and the</p>

Pre-Lodgement Consultation Compliance Table – 25 South Parade, Auburn

	<ul style="list-style-type: none"> • Is the proposal responding to a change in circumstances, such as the investment in new infrastructure or changing demographic trends that have not been recognised by existing planning controls? • Is the proposal the best way of achieving the intended outcomes, or are there other more suitable ways? 	<p>surrounding context based on the site’s proximity to the Auburn Town Centre.</p> <p>The subject site is currently zoned E4 General Industrial under the provisions of the Cumberland LEP 2021. Medical Centres and office premises are prohibited in the E4 General Industrial zone. The site is bound by the Main Suburban Railway to the north and represents a small portion of industrial zoned land surrounding by R3 Medium Density Residential and E1 Local Centre zoning reflected by its proximity to the Auburn Town Centre.</p> <p>The site has not been utilised for industrial purposes for an extended period of time and has accommodated commercial uses consistent with the site’s location in proximity to the Auburn Town Centre. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre representing a unique opportunity to facilitate further medical centre and office premises in an accessible location.</p> <p>The Planning Proposal is not a result of any specific strategic study or report however a number of specialist studies have been undertaken in support of the proposal that demonstrate the suitability of the site for the additional permitted uses of medical centre and office premises. The specialist studies are provided as Appendices to this report.</p> <p>In addition, a comprehensive assessment of the proposal has been undertaken against the strategic planning strategies and policies relevant to the site which is provided in the following sections of this report. The assessment has found that the Planning Proposal is generally consistent with the relevant objectives and actions of the</p>
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Pre-Lodgement Consultation Compliance Table – 25 South Parade, Auburn

		<p>key planning strategies and policies relevant to the site which are as follows:</p> <ul style="list-style-type: none"> • Greater Sydney Region Plan; • Central City District Plan; • Cumberland Local Strategic Planning Statement; and • Cumberland Employment and Innovation Lands Strategy. <p>There are three options that could apply to the site regarding its potential development. These are as follows:</p> <p>Option 1: Do Nothing</p> <p>This option does not promote the social and economic potential of the site which currently contains a commercial building on a site that has not been used for industrial purposes for an extended period of time. The site is located in close proximity to existing health services facilities, schools and the Auburn Town Centre representing a unique opportunity to facilitate further health services facilities and office premises in an accessible location.</p> <p>Option 2 – Lodge a Development Application</p> <p>A Development Application is not viable as the current zoning does not allow for the development envisaged and no other alternate pathway under current legislation would facilitate the intended outcomes. Therefore, the planning proposal is the most efficient and time effective approach to delivering the outcomes envisaged for the site.</p>
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Pre-Lodgement Consultation Compliance Table – 25 South Parade, Auburn

		<p>Option 3 – Planning Proposal</p> <p>The planning proposal is the best means to achieve the intended outcomes of the site and is the most efficient and time effective way of doing so.</p>
<p>Consistency with the strategic planning framework and policy context</p>	<p>Any planning proposal lodged for the site will need to demonstrate consistency with:</p> <ul style="list-style-type: none"> • Greater Sydney Region Plan and Central City District Plan • Cumberland Local Strategic Planning Statement • Cumberland Employment and Innovation Lands Strategy • New Ministerial Directions released 1 March 2022 • New consolidated SEPPs released 1 March 2022 	<p>A full assessment of the planning proposal’s consistency with the relevant strategic planning framework and policy context is provided in Part 3 of the planning proposal report.</p>
<p>Traffic and transport</p>	<p>If you wish to lodge a planning proposal application to the NSW Planning Portal, the following would be required at a minimum.</p> <ul style="list-style-type: none"> • Draft Planning Proposal – The form and content must be consistent with the Department of Planning and Environment’s new LEP-making Guideline • Urban Design Analysis 	<p>A Draft Planning Proposal has been prepared in accordance with the Department of Planning and Environment’s new LEP-making Guideline.</p> <p>An Urban Design and Massing Design Study has been prepared by Architectus (Appendix F) in support of the proposal which undertakes an assessment of the urban design impacts of the proposal and potential massing scenarios to inform the best fit maximum building height for the site based on the relevant provisions of the Cumberland LEP and DCP applying to the site. As a result, the proposal seeks to amend the Cumberland LEP to include a maximum building control of 11m for the site.</p>

Pre-Lodgement Consultation Compliance Table – 25 South Parade, Auburn

	<ul style="list-style-type: none"> • Economic Impact Assessment • Transport and Access Study • Heritage Impact Assessment/European Archaeology Assessment • Noise/vibration Assessment. 	<p>An Economic Impact Assessment has been prepared in support of the proposal by Hill PDA and is provided in Appendix D. The assessment concludes that the planning proposal will have no discernible economic impact on the locality.</p> <p>A Traffic Report has been prepared in support of the proposal by ML Traffic and is provided in Appendix E. The report concludes that the planning proposal is acceptable from a traffic and parking perspective.</p> <p>A Heritage Assessment has been prepared by Touring the Past in support of the proposal and is provided in Appendix H. The assessment states that the proposal is restricted to the provision of new permitted uses under the current zoning overlay at the place. No physical intervention, including sub-surface disruption, is proposed and concludes that the planning proposal is supportable from a heritage impact perspective.</p> <p>An Acoustic Letter has been prepared by Koikas Acoustics in support of the proposal and is provided in Appendix C. The assessment concludes that the proposal does not present an issue from an acoustical perspective and is likely to improve acoustic amenity for neighbouring land uses.</p>
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DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404

Attachment 2
Urban Design and Massing Study
Report

Prepared for: Dr Elias Kehdi
Date: July 26, 2023

architectus

25 SOUTH PARADE AUBURN

Urban design and
massing study report

PLANNING
PROPOSAL

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Project and report

Date July 17 2023

Client Dr Elias Kehdi

Document no. K:\230361.00\Docs\C_Client\C05_REPT\25 South Parade Auburn.indd

Version and date issued
 Issue A (Draft to client) - 17/07/23 Approved by: Tim Moore, Principal
 Issue B (Final to client) - 26/07/23 Approved by: Tim Moore, Principal

Report contact Kerwin Datu, Associate
 NSW architect no. 10146

This report is considered a draft unless signed by a Director or Principal

Approved by:


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We pay our respects to Elders, past and present.

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Introduction

This design report documents an urban design analysis and massing study for land located at 25 South Parade, Auburn NSW (Lot 2, DP 806999; hereafter the site). It has been produced to support a planning proposal currently under assessment by Cumberland Council to include additional permitted uses of medical centre and office premises on this site.

Cumberland Council have requested an urban design study to inform the planning proposal, analysing the site and illustrating potential built form scenarios under the proposed additional permitted uses.

The site and surrounding areas are the Lands of the Wangal and Wategora Peoples of the Eora Nation and now sit within the Gandangara Local Aboriginal Land Council.



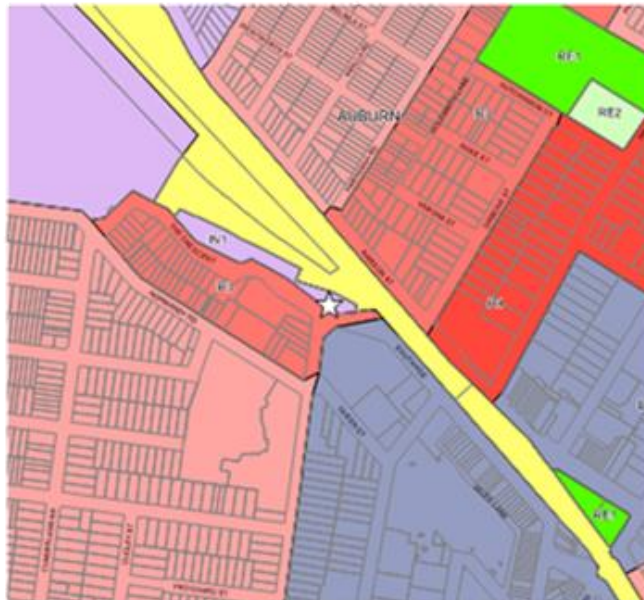
Image at right: Aerial photo of the site in the context of the Auburn town centre, the Main Suburban rail corridor, and the Clyde Marshalling Yards. For further labelling see page 6.

25 South Parade Auburn

Planning controls

Local Environmental Plan

The site is governed by Cumberland Local Environmental Plan 2021, from which the map extracts on this page are taken.



Land zoning

The site is zoned E4 – General Industrial (formerly indicated by IN1 as in the land zoning map above). It is bound to the north by the Clyde Marshalling Yards (SP2 – Infrastructure), to the southeast by the Auburn town centre (E1 – Local Centre, formerly indicated as B4 – Mixed Use), and to the southwest by residential development (R3 - Medium Density Residential). It is not proposed to change the zoning of the site; instead it is proposed to include additional permitted uses on the site: medical centre and office premises.



Floor space ratio

The floor space ratio applicable to the site is 1.0:1 (indicated by N in the floor space ratio map above). It is not proposed to amend this ratio.

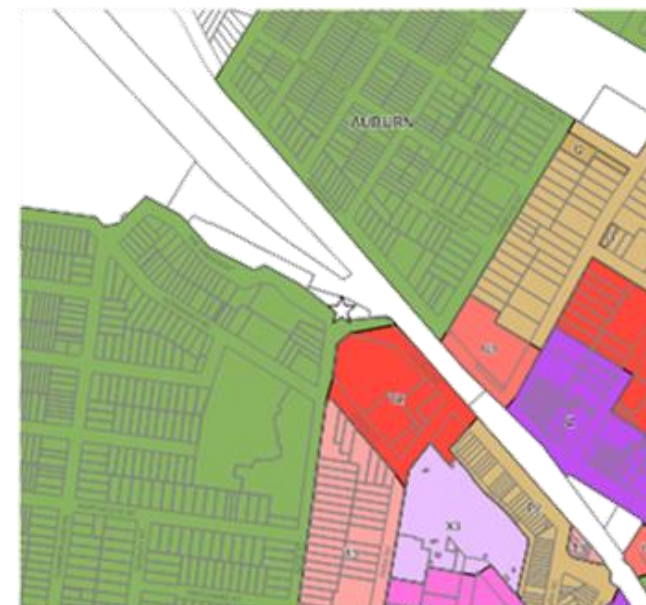
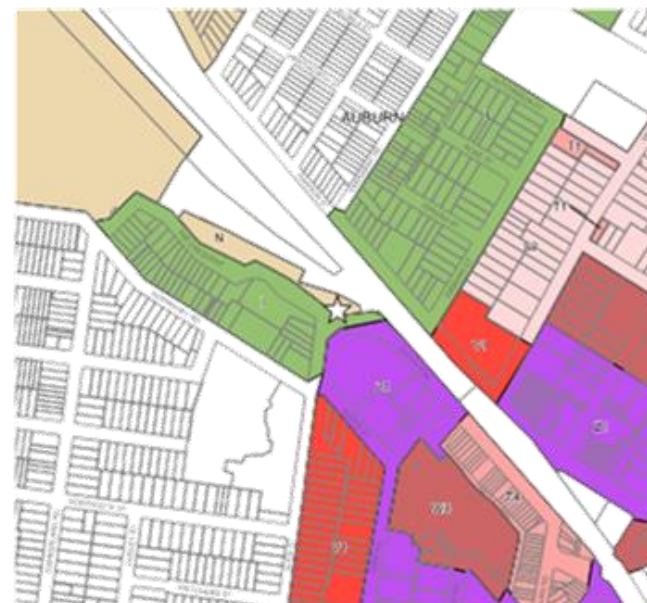
Height of buildings

There is no building height control currently applicable to the site (indicated by the white area in the height of buildings map below). The residential areas immediately to the north and southwest of the site have a height control of 9 metres (area in green), while the area zoned E1 – Local Centre to the southeast has a height control of 38 metres (area in red).

It is proposed to apply a new height control to the site as part of this planning proposal, based

Lot size

The minimum lot size applicable to the lot is 1,500m² (indicated by U2 in the lot size map above). The site area is 1,598m², which complies. It is not proposed to subdivide the site nor to anticipate its future subdivision in this urban design and massing study.



on the outcomes and recommendation of this urban design and massing study, as discussed in the relevant sections of this report.

Heritage

It is noted that the site is included in the heritage inventory item for the Clyde Marshalling Yards. The Clyde Marshalling Yards is a very large area, within which the site comprises a very small part. Heritage advice analysing the heritage components of the Clyde Marshalling Yards indicate that the heritage components do not



fall within the site itself. The nearest component to the site is the Auburn Railway Signal Box on Rawson Street on the northern side of the rail corridor.

The built form scenarios put forward in this report comply with the existing LEP controls shown here.

Site context

The site is a narrow parcel of industrial land measuring 1,598m² on the corner of the Clyde Marshalling Yards near the Auburn town centre. The lot is irregularly shaped, approximately 97 metres long with width tapering from 24 metres across its middle down to 10 metres at its eastern end and 5 metres at its western end. The site comprises a significant slope, with an RL of approximately 20.00 at its western end, rising to an RL of approximately 26.00 at its eastern end where it meets the roadbridge over the rail corridor. To its rear, within the marshalling yards, are a vegetated embankment and two small, recently constructed windowless rail infrastructure buildings (presumed to be rail systems electrical services facilities), but no rail trackways close enough to impact upon built form within the site. The site is isolated from surrounding residential and town centre development by South Parade, with no protected pedestrian crossing points across this street for hundreds of metres in either direction.

The residential development to its southwest (and on the north side of the rail corridor) comprises predominantly free-standing dwellings of a mix of eras from Federation brick and weatherboard cottages to postwar and late 20th-century bungalows. Immediately to the west of the site, a late 20th-century medium-rise apartment building of modest quality has been built.

Farther to the southwest is St Joseph's Hospital, which has stood on its location since 1892 but is soon expected to close. To the southeast is St John's Catholic Primary School, a facility that began within the hospital in 1893 before moving to its current location in the early 20th century. From behind this school towards Auburn Station farther to the southeast, an old town centre has been rapidly built out into high-density residential development of up to 12 storeys over the past two decades.





The site viewed from the west, looking east along South Parade. Apartment towers in the Auburn town centre are seen towards the southeast (right).



The site viewed from the south, looking north along Alice Street. The entrance to the existing building is on the west side of the building, in line with the western footpath of Alice Street, suggesting that a controlled pedestrian crossing could be made here to facilitate crossing of South Parade.



The site viewed from the east, looking west along South Parade. An indication of the traffic intensity approaching the roadbridge and the intersection with Rawson Street.



The site viewed from the north, looking south from Rawson Street over the rail corridor. Apartment towers in the Auburn town centre are seen towards the southwest (left).



Site access

Active transport access

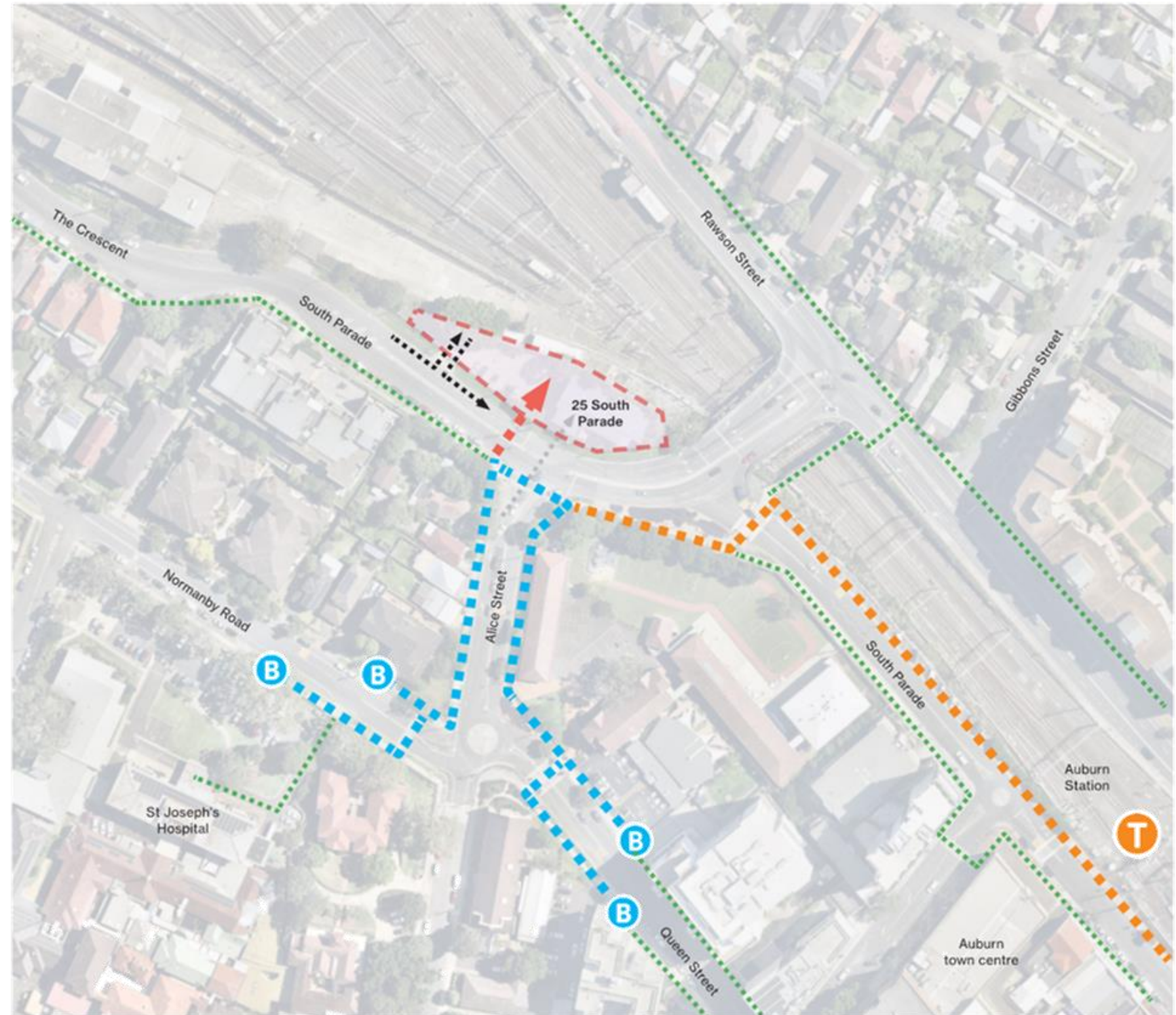
Currently pedestrian access to the site is impeded by the lack of any controlled pedestrian crossing within several hundred metres of the site in any direction. There are no crossings to the north side of South Parade in front of the site, whether at the traffic lights at Alice Street or elsewhere, nor to the north side of The Crescent to its west. There are no footpaths on either side of the roadbridge over the rail corridor, though there is a separate footbridge just south of the roadbridge. As a result, pedestrian access takes the form of an uncontrolled crossing of South Parade (indicated by the red arrow). This would best be rectified by the addition of a controlled pedestrian crossing as part of the traffic light system at the intersection of South Parade and Alice Street, most likely on the west side of Alice Street as shown. There is not currently any dedicated cycling infrastructure in the vicinity of the site.

Public transport access

The main public transport infrastructure for accessing the site is Auburn Station, a Sydney Trains station on the T1, T2 and T7 lines. From the station, pedestrians will walk northwest up South Parade, cross South Parade where necessary to the south side of the street, then cross again where possible (path indicated in orange). Buses stop at Auburn Station, from where pedestrians may follow the same route as above, or they stop near the intersection of Normanby Road, Alice Street and Queen Street, from where pedestrians will walk north along Alice Street before crossing South Parade where possible to access the site (paths indicated in blue).

Vehicular access

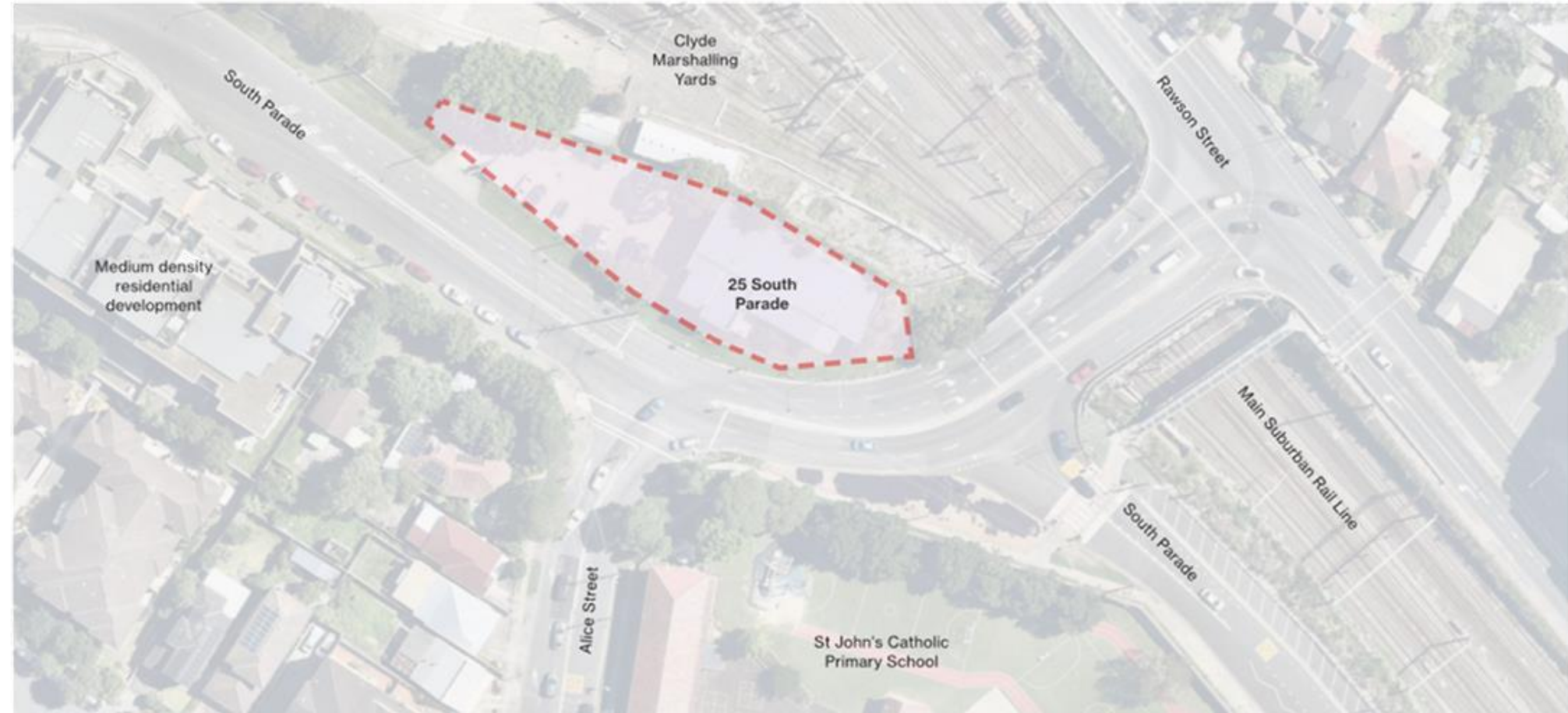
Cars and other vehicles may access the site only by approaching from the west along South Parade, as there is a median island preventing access from the east along South Parade. A roundabout a few hundred metres to the west at the end of The Crescent allows vehicles approaching from the east to u-turn to access the site. It is envisaged that vehicular access to the site could also be created by reconfiguring the intersection of South Parade and Alice Street as a four-way intersection, with a driveway into the site leading from the north of this intersection (indicated by a grey arrow), however this opportunity has not been found to be compatible with the massing scenarios likely to be built on the site.



Site interfaces

Under current conditions, the site is somewhat isolated and visually screened off from neighbouring development. To the southeast, the site is met by a solid brick wall and screening trees (of around 8 metres in height) of St John's Catholic Primary School, behind which playing fields intervene before classroom buildings are found set back several metres from the street. Any development on the site complying with FSR, setback, landscaping and proposed height controls is highly unlikely to have significant impact on the school in its current form. Given that the height control applicable to the school grounds is 38 metres, future development on the school grounds closer to South Parade is likely to be taller than any development on the site complying with existing and proposed controls, which will in turn have undoubtedly less impact on the precinct than any such school building.

To the southwest, the site faces one freestanding dwelling, which is side-on to the site. The dwelling faces Alice Street, and presents South Parade with a solid timber fence and further screening trees (also of about 8 metres in height). Any development on the site complying with existing and proposed controls is highly unlikely to have significant impact on this dwelling in its current form, and would be likely to have only negligible to minor impacts on any new residential development on this corner should such development be reoriented to address South Parade front-on. In any case these impacts can very easily be anticipated and mitigated through appropriate architectural and landscaping design in the front setback of the site.



To the west, the site directly faces a four-storey apartment building of modest quality and with no screening vegetation of its own. Any development on the site is likely to be directly visible from all apartments facing South Parade. However, any development on the site complying with existing and proposed controls is likely to be of smaller height and bulk to the apartment building. In any case these impacts can be mitigated by pulling any development on the site towards the east away from the apartment building where possible, and through appropriate architectural and landscaping design in the front setback of the site and on the western end of the site.

To the north, the site faces a vegetated embankment and small, windowless rail infrastructure buildings (presumed to be rail systems electrical services facilities). Any development on the site will have negligible impact on those uses. Across the rail corridor to the north, any development on the site complying with existing and proposed controls will be visible to the freestanding dwellings and medium-rise apartment buildings on the north side of Rawson Street but, at over 75 metres distance to the nearest residential building on that side, is likely to have no impact on them, and in any case vastly less impact than that of the rail infrastructure itself.



Looking west along South Parade from the intersection of Alice Street, showing the timber fencing and vegetation screen of the houses on the south side of South Parade. The medium density residential development on the south side of South Parade is seen in the distance.



Looking west along South Parade from the driveway of 25 South Parade, showing medium density residential development along the south side of South Parade.



Looking east along South Parade from the driveway of 25 South Parade, showing the timber fencing and vegetation screen of the houses on the south side of South Parade. Apartment towers in the Auburn town centre are seen in the distance.



Looking east along South Parade from the intersection of Alice Street, showing the brick wall enclosing the playing fields of St John's Catholic Primary School. Apartment towers on the north side of Auburn are seen in the distance.

Development controls

The massing scenarios presented on the following pages take into account the development controls contained in the Cumberland Development Control Plan (DCP) 2021 applicable to the site in particular and to lands zoned E4 – General Industrial overall.

Relevant controls directly affecting the outcomes of the massing study are identified on this page. Note that controls not cited here may be applicable but have been judged not to significantly affect the outcome of the study.

Part D – Development in Industrial Zones

2.1 Setbacks and streetscape character

- Front setbacks are to be 5m. Where the prevailing building setbacks within the street are significantly different, consideration will be given to an alternative setback (Control C7). [It is noted that adjacent industrial development which is on a similarly shallow lot is set back 4m.]
- Landscape all front setbacks to provide a high quality streetscape (control C1.).
- Front setback areas shall not be used for storage or display of goods or excessive signage, loading/unloading or large areas of car parking (control C2).
- Ensure landscaping setbacks comprise soft landscaping and deep soil zones only (control C3).
- Buildings may be built on a nil side or rear setback (control C8).

2.7 Public domain improvements

- A minimum of 15% of the site shall be provided and maintained as soft landscaping, with lawns, trees, shrubs for aesthetic purposes and the enjoyment of workers of the site (control C5).

Part G – Miscellaneous Development Controls

3 Parking rates

- Commercial - Business and Office general rates: 1 space / 40m² GFA [therefore 40 cars for 1,600 m² GFA]

4.3 Basement parking

- Basement garages and driveways shall be permitted in accordance with the relevant Australian Standards (control C1).
- Basement parking shall be located within the building footprint (control C2).
- Basement parking shall not unreasonably increase the bulk and scale of development (control C3).
- Basement parking manoeuvring shall ensure that vehicles can enter and exit in a forward direction (control C6).

4.5 Development in industrial zones

- On-site parking is to be designed so that large expanses of bland concrete paving in the car parking and driveway areas are avoided (control C2).
- Car parking areas, particularly large areas shall be landscaped so as to break up large expanses of paving. Landscaping shall be required around the perimeter and within large carparks (control C3).
- In open parking areas, 1 shade tree per 10 spaces shall be planted within the parking area (control C4).

4.6 Loading requirements for commercial and industrial development

- Business and office premises: 1 space / 4,000m² GFA. Other [medical centres]: 1 space / 2,000m² [GFA] (control C1).

Design inputs

Site information – Disclaimer

Information provided to Architectus for the purposes of this urban design and massing study comprised architectural drawings of the existing condition of the site but not a site survey. Site context model has been extracted from publicly available topographic models for the Sydney region, including nominal building height data that are computerised estimates only. These models cannot be relied upon for accuracy. All relative levels and other height data shown in this urban design and massing study report are estimates only. However, nominal floor levels proposed in the massing scenarios presented here have been compared to the existing condition of the site described within the architectural drawings provided to Architectus. A site survey must be undertaken before any further development of the massing scenarios provided here towards concept or schematic design of architectural outcomes.

Design assumptions

In addition to the LEP and DCP controls applicable to the site, the massing study is guided by the following design assumptions.

- Building envelopes target a nominal GBA of 1,700m² to achieve a GFA of 1,600m².
- Typical floor-to-ceiling heights for the proposed additional uses of medical centre and office premises are 2,700 mm, typical floor-to-floor heights 3,600 mm.
- Typical floor-to-ceiling heights for car parking are minimum 2,400 mm, typical floor-to-floor heights 3,000 mm.
- Typical roof buildup over the roof level is 750 mm, typical roof plant 2,400 mm over the roof level. Roof plant is generally accommodated within the same height controls as the given scenario.
- Where the building envelope tapers, its ends must accommodate an enclosed medical consulting room of at least 4.5m in depth.
- Car parking generally complies with AS 2890.1 requirements for short-term parking at medical centre facilities.
- Multiple levels of basement car parking is an option but should be minimised, both because it is likely to be very expensive compared to the scale of any development, and because the site is within the vicinity of embankments rising to a road bridge over the rail corridor. Any basement excavation should seek to be pulled away from this roadbridge to avoid civil engineering complications.

Massing strategy

Site strategy

The main challenge for the site strategy is the DCP requirement to accommodate a minimum of 40 car parking spaces. Because of the narrow, tapering shape of the site, it is impossible to incorporate all 40 spaces behind the 5 metre front setback, and it is necessary to encroach within in at certain points. An indicative parking strategy is shown below (not taking into account vertical connections to accommodation floors). At the western, lower end of the site, a driveway enters at an angle across the 5 metre setback. At the centre and at the eastern end, the corners of the parking area encroach within the 5 metre setback but do so below ground level, enabling landscaping to be built overhead facing the street. The below ground parking area is pulled

away from the approaches to the roadbridge at the eastern end of the site.

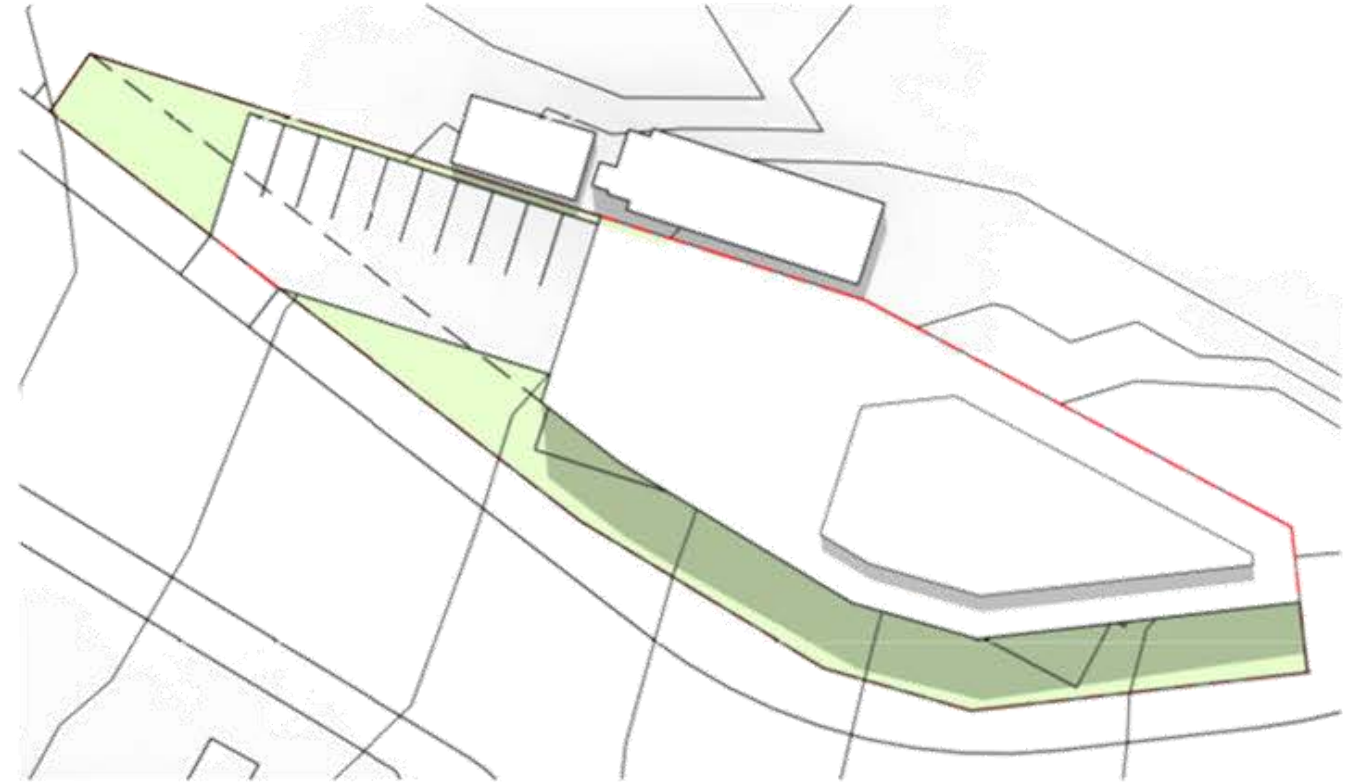
Despite these encroachments into the front setback, the majority of the front setback is still available for deep soil planting, as is the western end of the site. This readily achieves soft landscaping across at least 25% of the site, well above the 15% minimum required by the DCP, positively offsetting the impact of the parking spaces.

Height strategy

It is proposed that any development on the site be in keeping with the height and bulk of the majority existing and potential future developments on surrounding sites. It is noted



Indicative parking strategy for the site showing areas at-grade (surrounded by landscaping areas shown in green) and areas below ground (surrounded by earth shown in grey). The 5 metre front setback is shown by a black dashed line.



Indicative complying building footprint strategy for the site showing a building envelope within the 5 metre front setback (black dashed line) and nil side and rear setbacks. Areas available for soft landscaping are shown in green.

that the current height control on the residential area to the southwest is 9 metres and that the existing medium density residential development immediately west of the site surpasses this by around 2 metres (4 storeys of 2.7 metres floor-to-floor). For the purposes of this urban design and massing study, 9 metres and 11 metres shall be considered the lower and upper bounds for a height control that produces development on the site that is in keeping with its immediate context.

Building footprint strategy

Considering the lower bound of this study as a first step, it has been found that there is effectively only one building envelope that (a) provides the 1,600m² GFA allowed by the LEP, (b) complies with the setbacks required by the DCP, and (c) complies with a height limit of 9 metres. This is to provide two floors of

accommodation generally across the eastern half of the site, within the 5 metre front setback and with nil setbacks to the rear and east side boundaries. Since the site falls away to the west, continuing the building envelope any farther west brings the height of the western elevation above 9 metres. This is the first massing scenario described on the following pages.

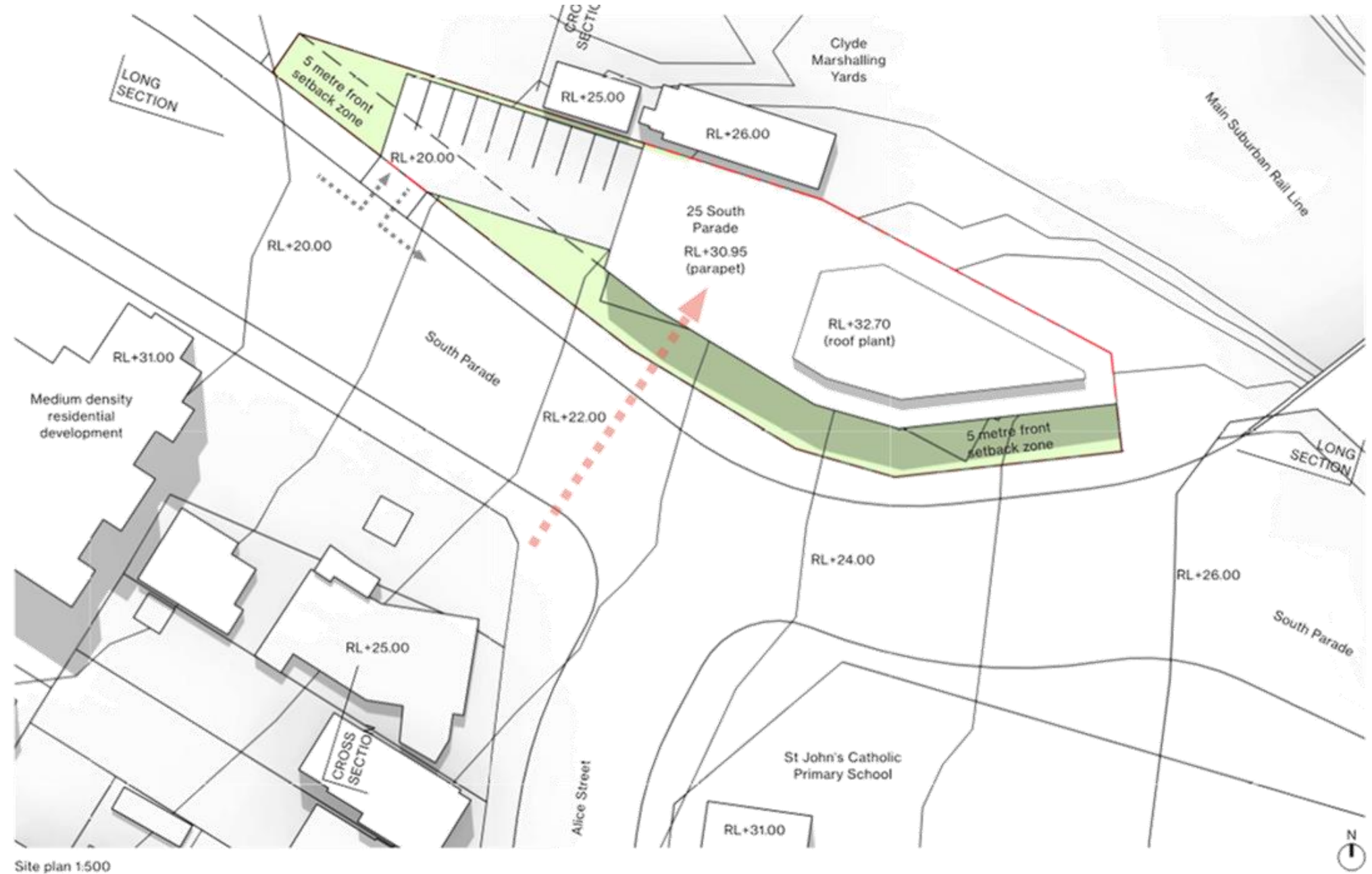
However, nil setbacks provide a compromised experience for building occupants and are also challenging to excavate and construct. Relaxing the height control to 11 metres allows the building envelope to be extended to the west along with achieving 1.5 metre setbacks to the rear and east side boundaries. This is the second massing scenario described on the following pages.

Massing scenario 1

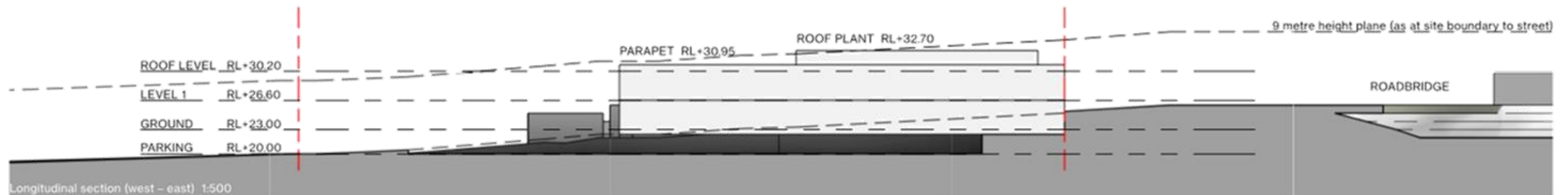
9 metre height control

The first massing scenario presented here provides 1,600m² of GFA within a building envelope of 850m² GBA over two floors generally towards the eastern half of the site. The building is approximately 55.5 metres long and is 19.4 metres wide at its widest point, tapering to 13.8 metres at its western end (set out in line with the larger rail building to its rear) and 5.4 metres at its eastern end. The building height is at or below 9.0 metres over the natural ground plane at all points.

The building envelope complies with the 5 metre front setback zone, though providing nil setbacks to the rear and east side boundaries. A nominal roof plant area is accommodated over the eastern half of the building envelope. Both the main building envelope and the roof plant area are pushed towards the east so that as the ground slopes down towards the west, the building remains below a 9 metre height plane, most critically at the western elevation where the parapet height of RL+30.95 remains just within 9 metres above the RL+22.00 site contour. This is based on typical floor-to-ceiling and floor-to-floor allowances for the proposed additional uses.



Site plan 1:500



Longitudinal section (west - east) 1:500

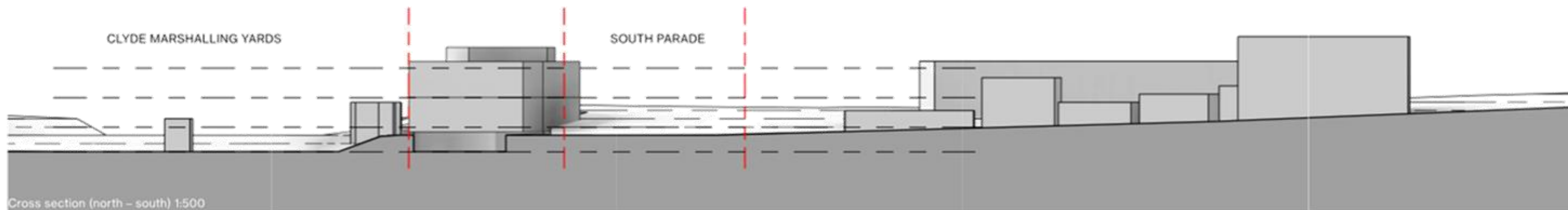


Axonometric view over precinct from south

Parking is provided at-grade at RL+20.00 accessed from South Parade at the western (lower) end of the site. This parking area continues horizontally under the building into a below-ground basement area excavated out of the embankment rising towards the roadbridge. Pedestrian access is anticipated via a potential new controlled crossing of South Parade on the west side of the intersection with Alice Street.

The at-grade parking area encroaches within the 5 metre front setback zone. However this impact is mitigated by the achievement of at least 25% deep soil soft landscaping across the site (where the minimum required by the DCP is 15%), distributed throughout the rest of the 5 metre front setback zone and the undevelopable western end of the site. This reasonably continuous band of soft landscaping enables the development to include significant trees and shrubs along the length of South Parade.

The height and scale of the building is well in keeping with those of surrounding developments, including the classroom buildings of St John's Catholic Primary School to the southeast and the (slightly taller) medium-rise residential development to the west. It is an order of magnitude below the development in the Auburn town centre a block farther to the southeast.



Cross section (north - south) 1:500

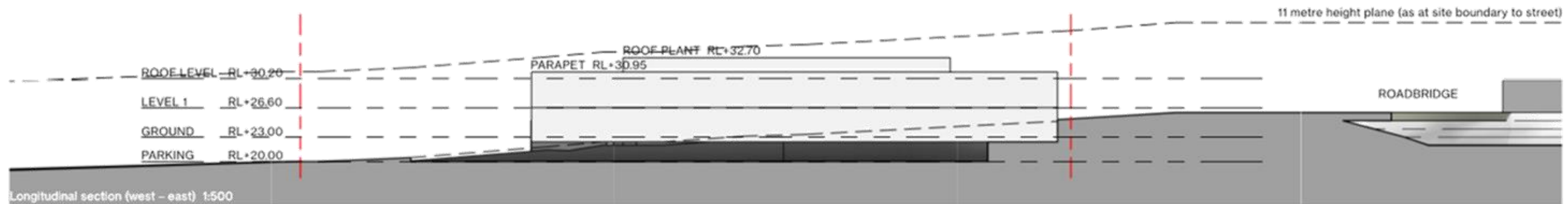
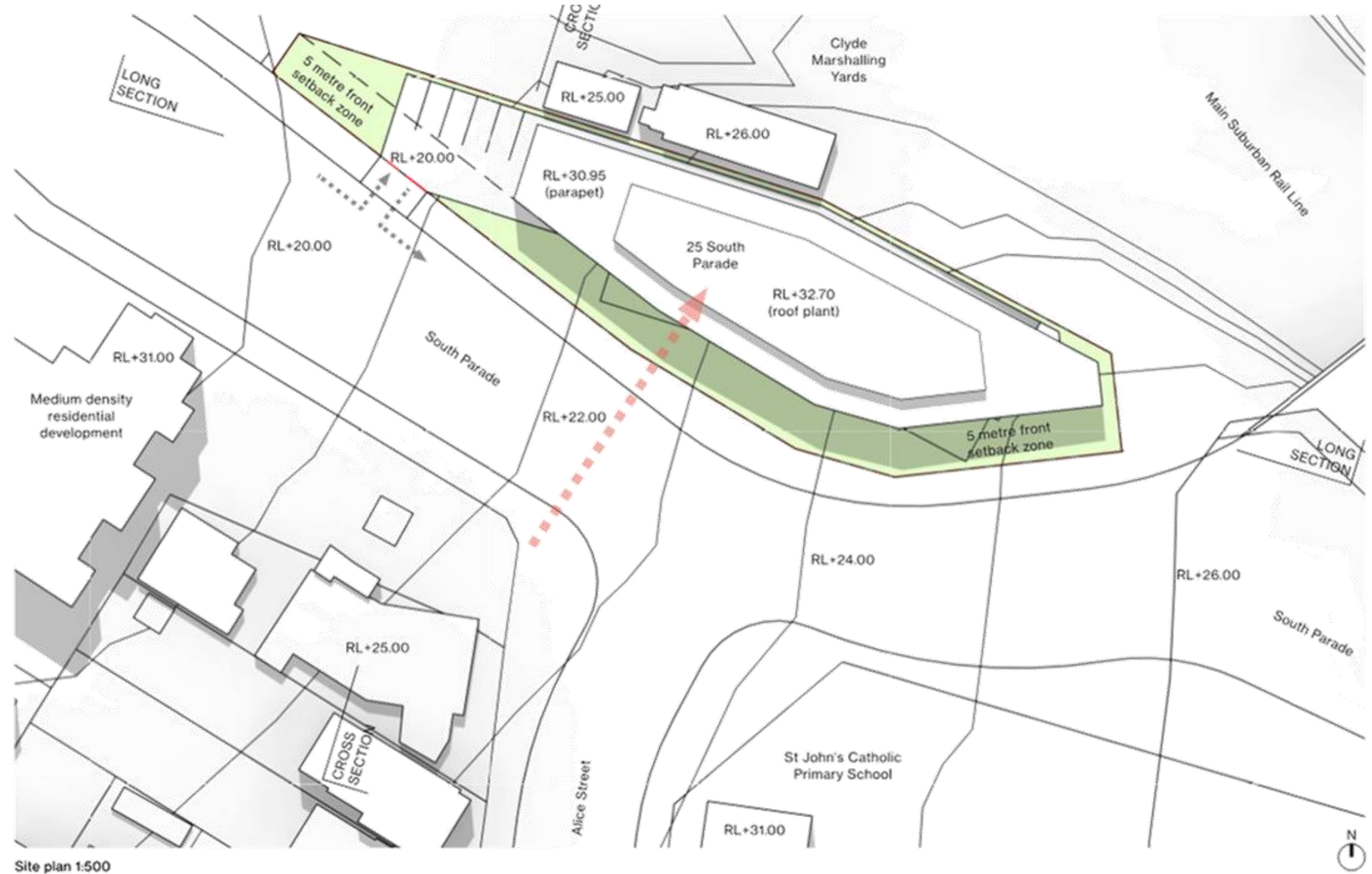
Massing scenario 2

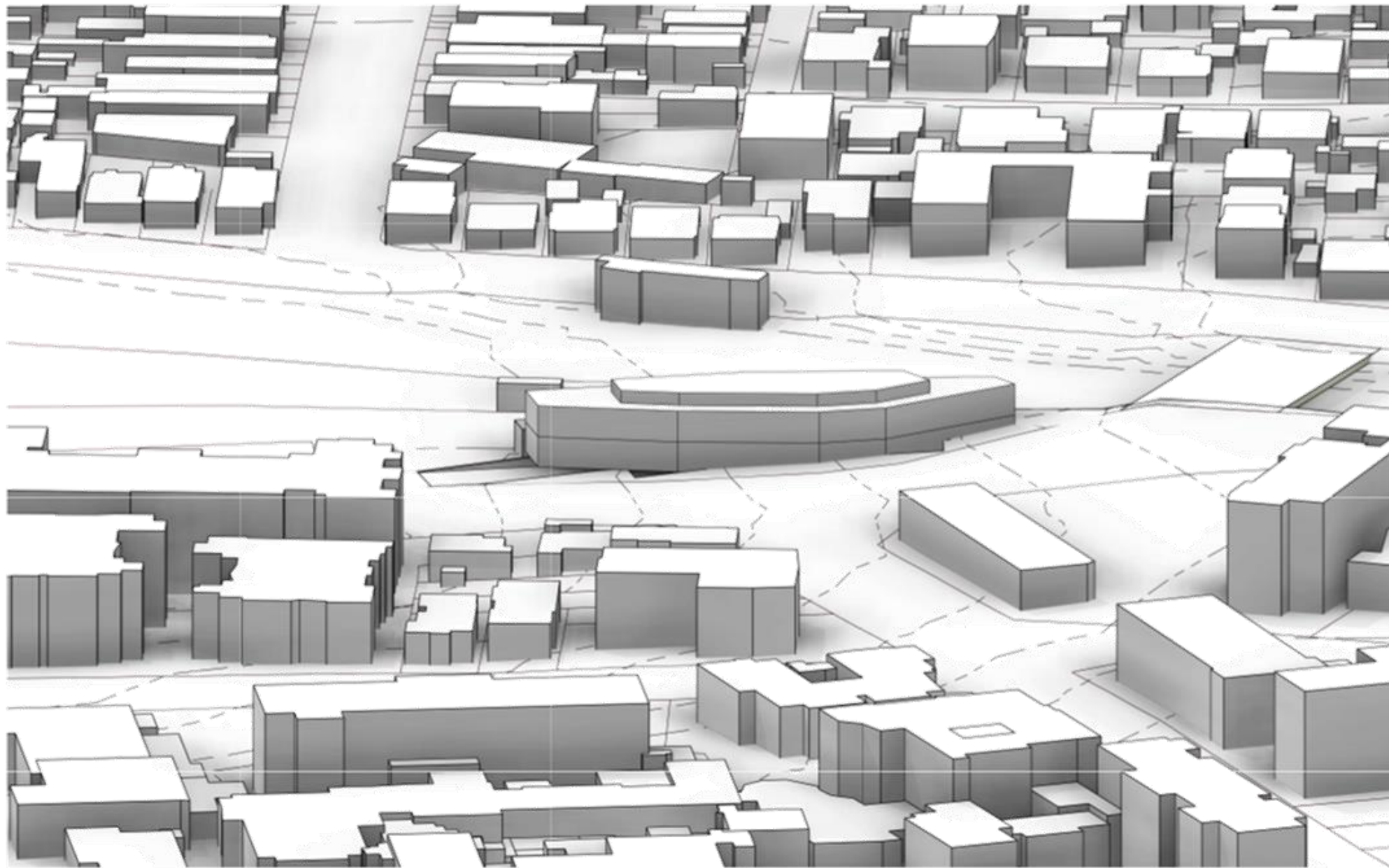
11 metre height control

The first massing scenario presented above complied with all existing development controls and the lower bound of potential height controls under consideration. However, by providing nil setbacks to the rear and east side boundaries, it produces a compromised experience for occupants of the building and creates challenges for excavation and construction along these boundaries.

The second massing scenario here considers a slight relaxation of the height control to 11 metres. This allows the building footprint to expand westward even as the ground slopes down towards the west, thus allowing setbacks of 1.5 metres along the rear and east side boundaries. These setbacks afford daylighting and natural ventilation opportunities to the northern facade of the building as well as an allowance for screening and other devices to calibrate those opportunities. This provides a much improved experience for occupants at the cost of only negligible to minor impacts to the bulk of the building and on the precinct.

Like the first scenario, this second scenario provides 1,600m² of GFA within a building



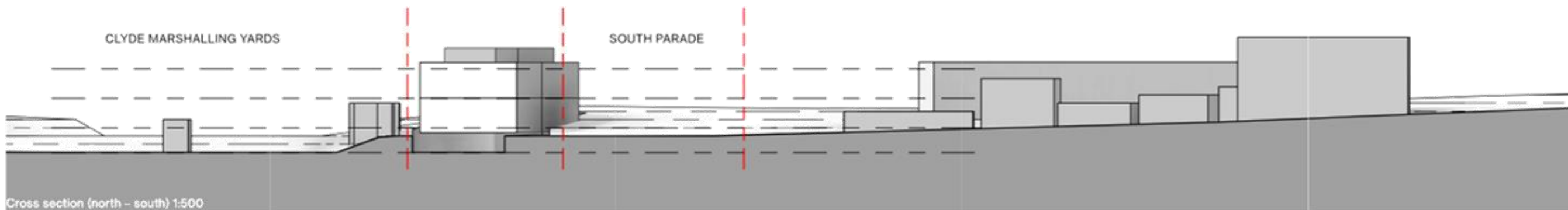


Axonometric view over precinct from south

envelope of 850m² GBA over two floors. The building is approximately 65.5 metres long and is 17.9 metres wide at its widest point, tapering to 8.3 metres at its western end (set out in line with the smaller rail building to its rear) and 4.6 metres at its eastern end. The building height is at or below 11.0 metres over the natural ground plane at all points. This is based on typical floor-to-ceiling and floor-to-floor allowances for the proposed additional uses. Levels of each structural floor are the same as in the first massing scenario.

Parking provision is generally the same as in the first massing scenario, with at-grade parking accessed from South Parade at the western end of the site, and continuing horizontally under the building into a below-ground basement. The at-grade parking area encroaches within the 5 metre front setback zone, but as in the first scenario this is mitigated by the achievement of at least 25% deep soil soft landscaping across the site.

Even with the slightly elevated height control, the height and scale of the building remains well in keeping with those of surrounding developments, including the classroom buildings of St John's Catholic Primary School to the southeast and the medium-rise residential development to the west. It remains an order of magnitude below the development in the Auburn town centre a block farther to the southeast.



Cross section (north - south) 1:500

Discussion

Precinct outcomes

Both massing scenarios presented in this report comprise building envelopes that are well in keeping with those of surrounding developments, including the classroom buildings of St John's Catholic Primary School to the southeast and the (slightly taller) medium-rise residential development to the west. They are both an order of magnitude below the development in the Auburn town centre a block farther to the southeast.

Both massing scenarios comprise at-grade parking areas that encroach within the 5 metre front setback zone. However, in both scenarios, this impact is mitigated by the achievement of at least 25% deep soil soft landscaping across the site (where the minimum required by the DCP is 15%), distributed throughout the

rest of the 5 metre front setback zone and the undevelopable western end of the site. This reasonably continuous band of soft landscaping enables the development to include significant trees and shrubs along the length of South Parade.

Overall, both massing scenarios are highly unlikely to have significant impacts on surrounding developments and both produce satisfactory precinct outcomes.

Architectural outcomes

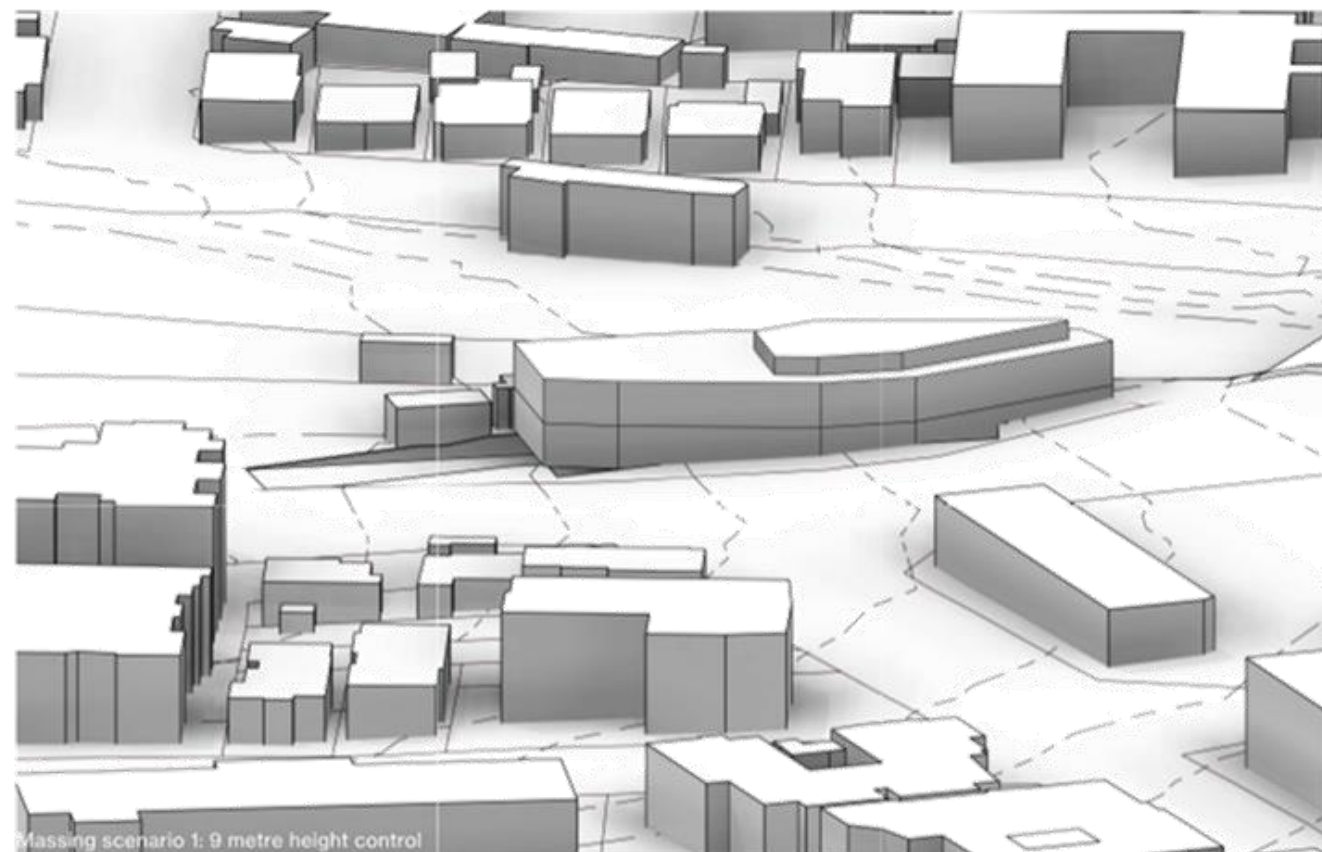
While the two massing scenarios produce generally similar precinct outcomes, they produce reasonably different architectural outcomes.

The first scenario comprising a 9 metre height control creates a building envelope that is restricted to the central and eastern portions of the site. Achieving the full floor space allowed under the LEP engenders a floor plate with nil setbacks to the rear and east side boundaries. As no fenestration can be provided to these boundaries, as a result this scenario produces a compromised experience for building occupants as well as poorer sustainability performance for the building. Nil setbacks also make the works more difficult to excavate and construct, and cause the building to have greater impacts to ground works and civil infrastructure immediately to the north and east of the site.

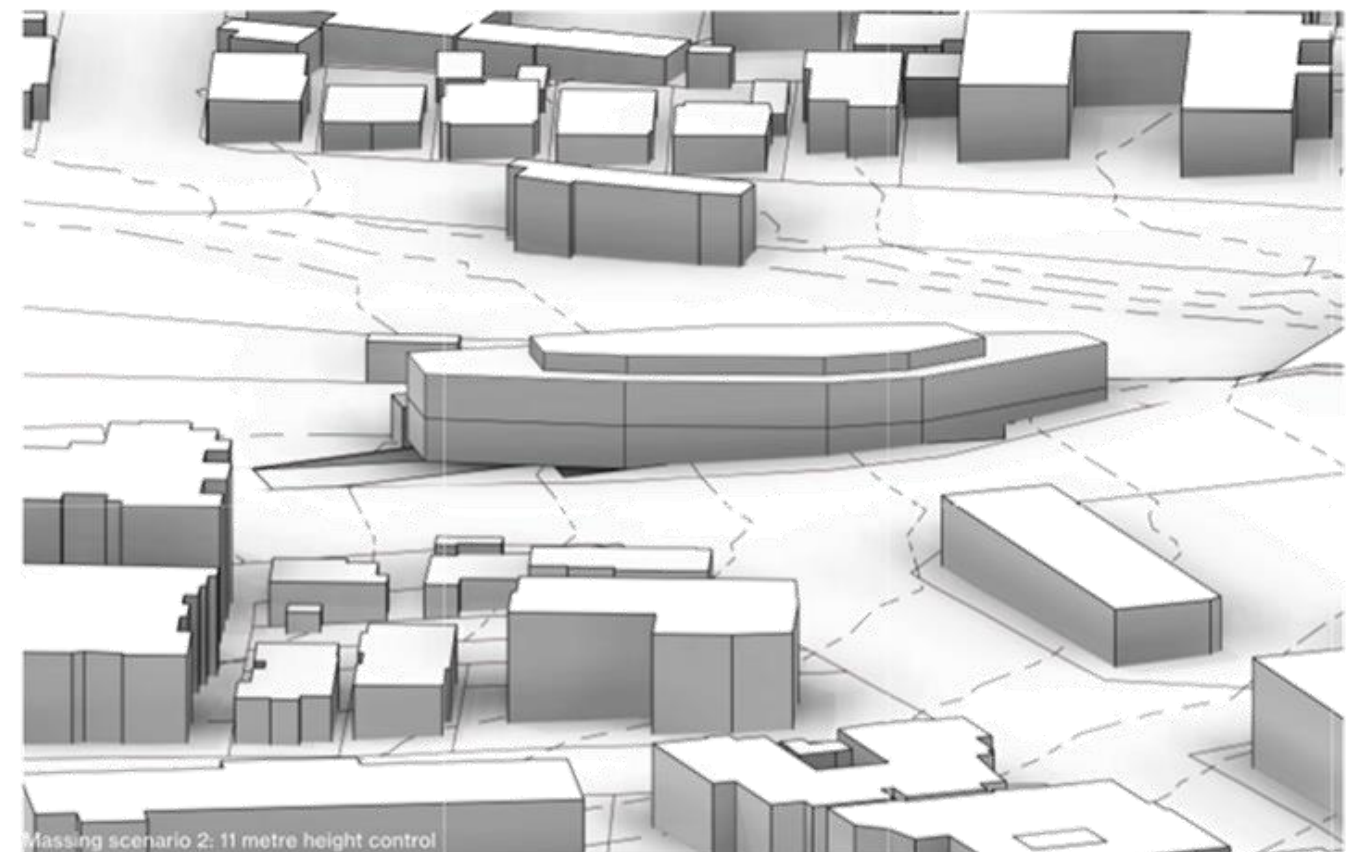
The second scenario comprising an 11 metre height control creates a building envelope that can comfortably extend farther into the west of

the site. The full floor space allowed under the LEP can be achieved with a relatively relaxed floor plate that allows setbacks to the rear and east side boundaries. Consequently fenestration can be provided to all four sides of the building, improving opportunities for daylighting and natural ventilation, for facade elements that can calibrate the provision of both, and thus improved experiences for building occupants and greater sustainability performance for the building. The works can be more easily excavated and constructed and can more easily avoid impacts to ground works and civil infrastructure around the site.

Overall, the second massing scenario comprising an 11 metre height control provides a superior architectural outcome for the development and its occupants.



Massing scenario 1: 9 metre height control



Massing scenario 2: 11 metre height control

Conclusion

The massing scenarios presented above demonstrate that the proposed additional uses of medical centre and office premises may be accommodated on the site to the full floor space allowance of the LEP, and in compliance with existing LEP and DCP controls. Despite challenges accommodating the minimum car parking requirements of the DCP for the proposed additional uses within the site's narrow, tapering geometry, a satisfactory urban design outcome can be achieved by providing deep soil soft landscaping over and above the minimum required by the DCP, within the front setback zone where it can be seen and enjoyed by surrounding occupants and passersby as well.

Consideration of building envelopes providing the floor space allowable under LEP and conforming to height controls of either 9 or 11 metres identifies that both height controls produce building envelopes with very similar and satisfactory outcomes for the precinct.

However, compared to the height control of 9 metres, the height control of 11 metres produces a building envelope with significantly superior architectural outcomes in terms of daylighting and natural ventilation, occupant experience, sustainability, constructability, and civil engineering impacts.

Consequently, we recommend that the planning proposal put forward a height control of 11 metres for the site.

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**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 3
Traffic and Parking Impact
Assessment**

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TRAFFIC AND PARKING IMPACT ASSESSMENT

Proposed Re-zoning application to Medical centre with office

25 South Parade, Auburn NSW

Prepared for: Elias Kehdo

A221755N (Version 2q)

July 2023

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1. INTRODUCTION

Motion Traffic Engineers was commissioned by Elias Kehdo to undertake a traffic and parking impact assessment of a re-zoning application to Proposed Medical centre with office at 25 South Parade in Auburn.

The site is currently as an eye doctor surgery with one doctor working servicing patients.

This traffic report presents an assessment of the anticipated transport implications of the Proposed Medical centre with office, with the following considerations:

- Background and existing traffic and parking conditions of the Medical centre with office site
- Assessment of the public transport network within the vicinity of the site
- Adequacy of car, bicycle and motorcycle parking provision
- The projected traffic generation of the Proposed Medical centre with office and;
- The transport impact of the Proposed Medical centre with office on the surrounding road network.

In the course of preparing this assessment, the Medical centre with office site and its environs have been inspected, plans of the development are examined, all relevant traffic and parking data have been collected and analysed.

2. BACKGROUND AND EXISTING CONDITIONS OF THE PROPOSED SITE

2.1. Location and Land Use

The Proposed Medical centre with office site is located at 25 South Parade in Auburn. The site is located within walking distance to Auburn train station and is at the periphery to Auburn town centre. There is a nearby school (St John's Catholic School) and the St Joseph's Hospital and the Medical centre with office would be an "allied" activity in support of a "medical hub". The site is located in *General Industrial(INI)* zone. *The report is part of a re-zoning submission.*

Figures 1 and 2 show the location of the Proposed Medical centre with office site from aerial and street map perspective respectively. Figure 2 also shows the location of the surveyed intersections in relation to the site.

Figure 3 shows a photography of the site frontage taken from South Parade.



Figure 1: Location of the Proposed Medical centre with office site on Aerial

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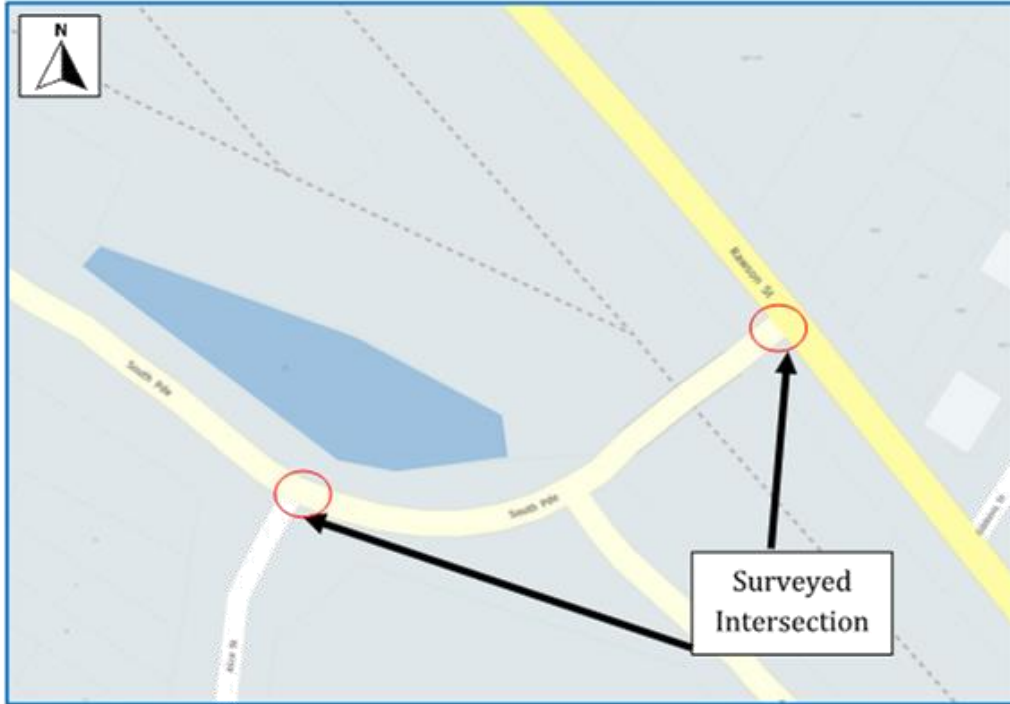


Figure 2: Location of the Proposed Medical centre with office site on Street Map



Figure 3: Photograph of the Site from South Parade

2.2. Pedestrian Crossings on South Parade

There are no pedestrian crossings on South Parade at the signalised intersection of South Parade with Alice Street as shown in Figure 3A. Currently it is not TfNSW policy of building new signalised intersections without pedestrian crossings.

In order to provide pedestrian safety and to encourage public transport use of any activity at the site, it is highly recommended that a pedestrian crossing on the western approach. The western approach of South Parade has lower traffic volumes than the eastern approach and would have better pedestrian safety,



Figure 3A: Photograph of the South Parade at the signalised intersection

2.3. Road Network

This section discusses the road network adjacent to the site.

South Parade is a major collector road with one lane each way at the midblock as expands to two lanes one way and three lanes other way between intersections with Alice Street and Rawson Street. The default speed limit is 50 km/hr. Time restricted on street parking of a various time limit is permitted on both side of the road during business hour. Figure 4a, 4b and 4c shows a photograph of South Parade.

Alice Street is local a collector road with two lanes towards South Parade, one lane away from South Parade. The default speed limit of 50 km/hr, school zone is located on the road thus during school

Traffic Impact Assessment for a Re-Zoning Application for Medical Centre with Office

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days on selected hours speed limit is 40 km/hr. Time restricted on street parking of one hour is permitted on both side of the road during business hour near the proposed Medical centre with office. Figure 4d shows a photograph of Alice Street.

Rawson Street is a sub-arterial road with two lanes of traffic on each way at the midblock and extra one right turn bay towards South Parade. The sign posted speed limit of 50 km/hr. On street parking is permitted on selective sections of this road. Figure 4e and 4f shows a photograph of Rawson Street.



**Figure 4a: South Parade Looking West
From intersection with Alice Street**



**Figure 4b: South Parade Looking towards
intersection with Rawson Street**



**Figure 4c: South Parade towards Auburn
Station from West**



**Figure 4d: Alice Street from intersection with
South Parade towards South**



Figure 4e: Rawson Street towards Auburn Station from West



Figure 4f: Rawson Street from East to West

2.4. Public Transport

The nearest bus stop is located less than 150 metres at Queen Street from the Proposed Medical centre with office on South Parade which is serviced by bus route 908. This bus route provide transport to suburbs including Yagoona, Birrong, Berala, Auburn, Merrylands, Guilford and South Granville. Figure 5a shows the bus route 908.

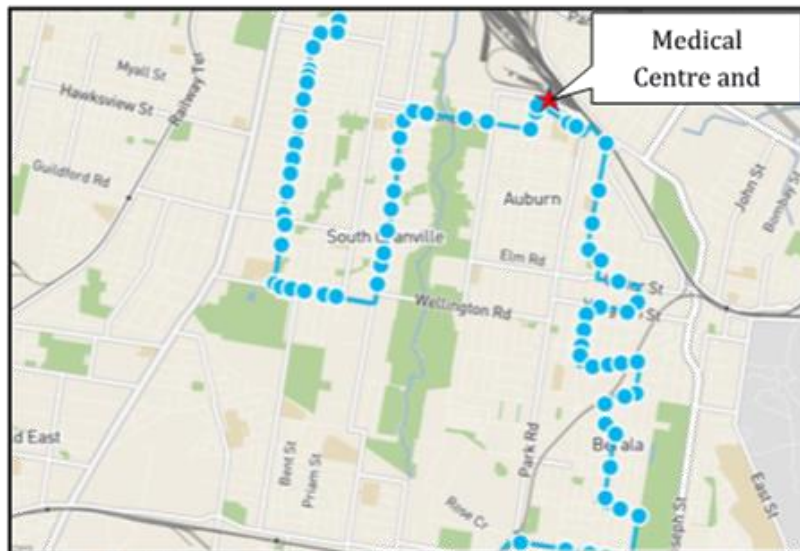


Figure 5a: Location of the Proposed Medical centre with office site in Relation to the bus route 908

Auburn Train Station and Bus Interchange is about 350 meters away from site at South Parade. From here, T1 North Shore & Western Line and T2 Inner West & Leppington Line operates to Northern and Western suburbs and Sydney City areas. Figure 5b shows the T2 Train Line map. Overall, the site has excellent access to public transport.

*Traffic Impact Assessment for a Re-Zoning Application for Medical Centre with Office
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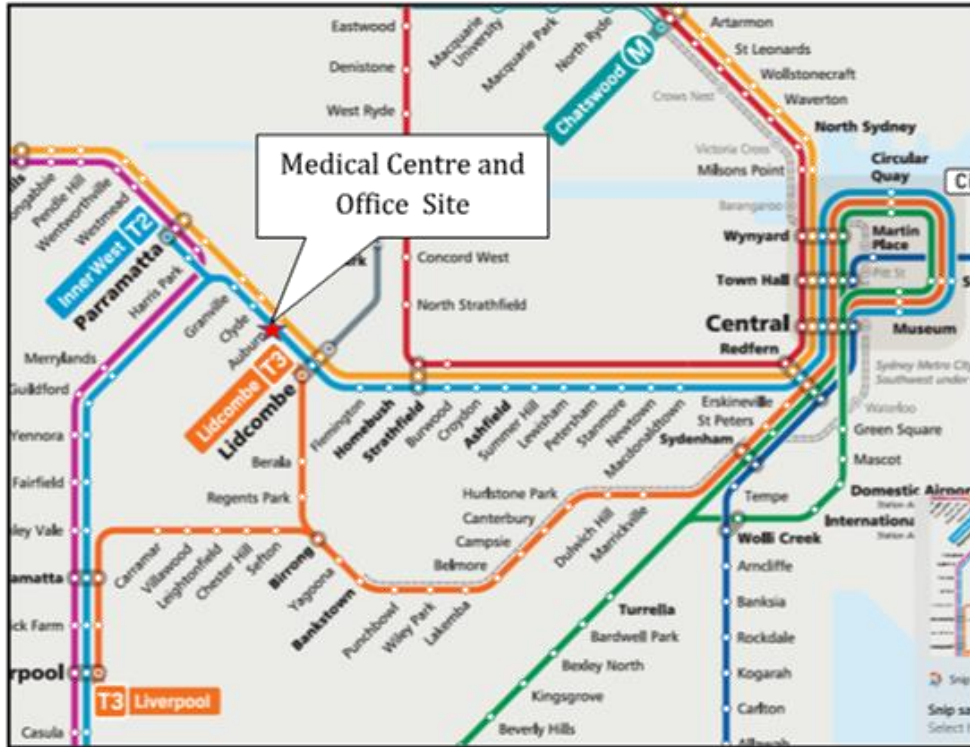


Figure 5a: Location of the Proposed Medical centre with office site in Relation to the Train network

2.5. Public Parking

On-street parking is available on South Parade west of Alice Street. There is more parking supply on the southern side of South Parade than on the northern side. The site visit showed a small number of vacant on-street car spaces near the proposed Medical centre with office.

2.6. Intersection Description

As part of the traffic impact assessment, the performance of the two nearby intersection was surveyed and assessed:

- Signalised intersection of South Parade with Alice Street
- Signalised intersection of Rawson Street with South Parade

External traffic travelling to and from the development is likely to travel through the intersection mentioned above.

The two intersections are “network” intersections in SIDRA.

The signalised intersection of South Parade with Alice Street is a three-leg intersection with all turn movements permitted. Except the right turn movement from South Parade into Alice Street.

*Traffic Impact Assessment for a Re-Zoning Application for Medical Centre with Office
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pedestrians crossing is only provided on the south leg of the intersection. Figure 6a presents the layout of this intersection using SIDRA 9 – an industry standard intersection assessment software and Figure 6b represents the ariel view of the intersection.

The signalised intersection of Rawson Street with South Parade is a three-leg intersection with all turn movements permitted, Pedestrian crossings are provided only on the eastern leg of the intersection. Figure 6c presents the layout of this intersection using SIDRA 9 and Figure 6d represents the ariel view of the intersection. The numbers on the lanes represent the length of short lanes in metres. The red lane represents the bus lane, and the green dashes lane represent the short right lane with parking.

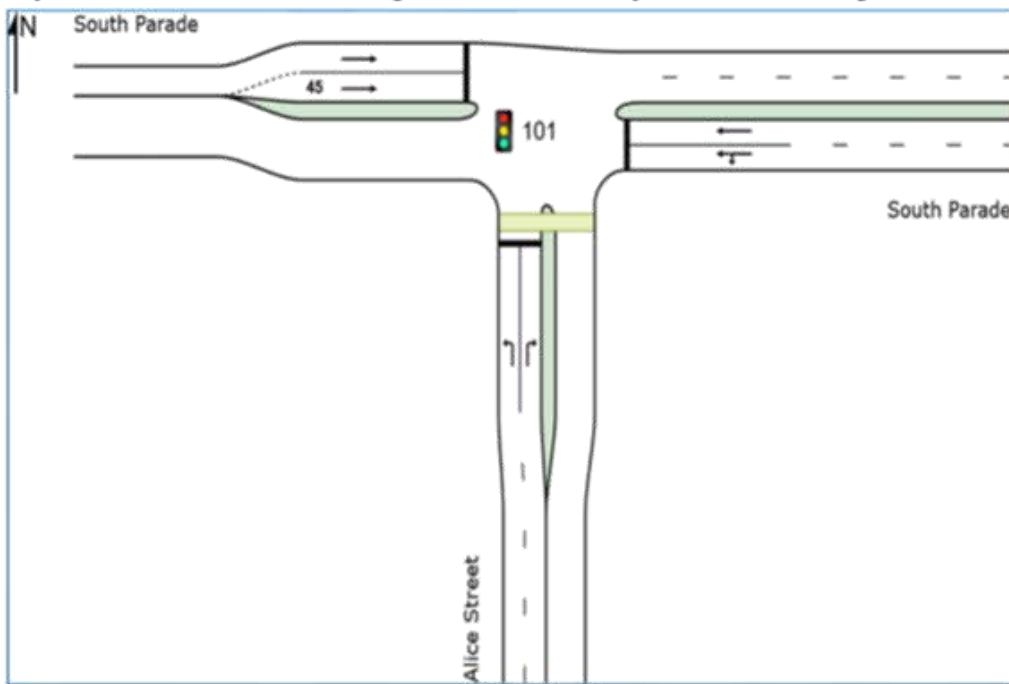


Figure 6a: Signalised intersection of South Parade with Alice Street (SIDRA)

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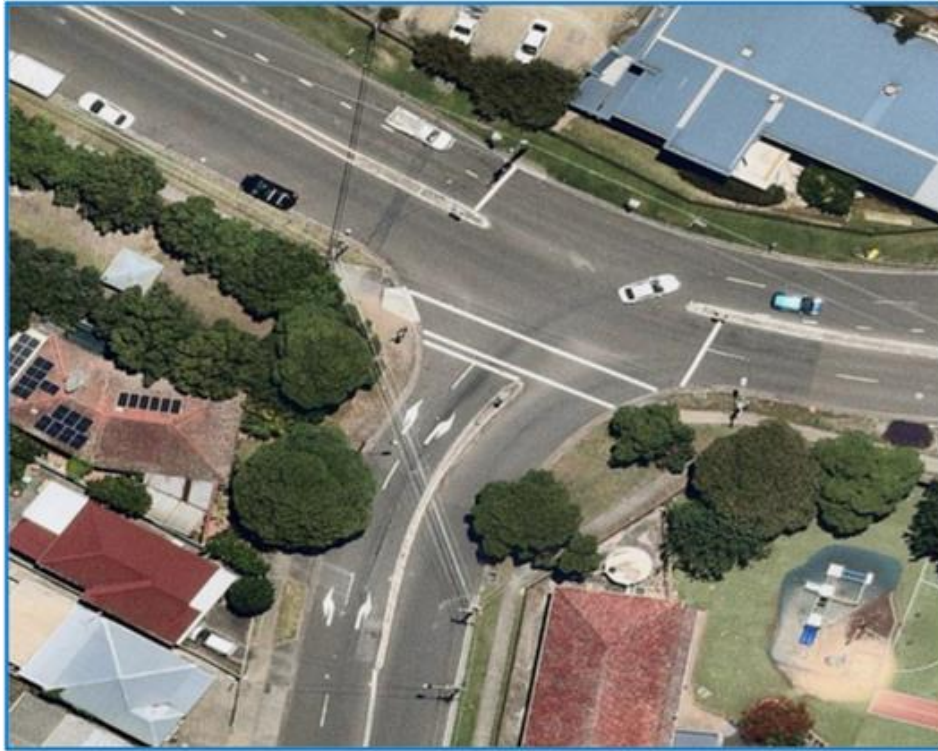


Figure 6b: Signalised intersection of South Parade with Alice Street Aerial View

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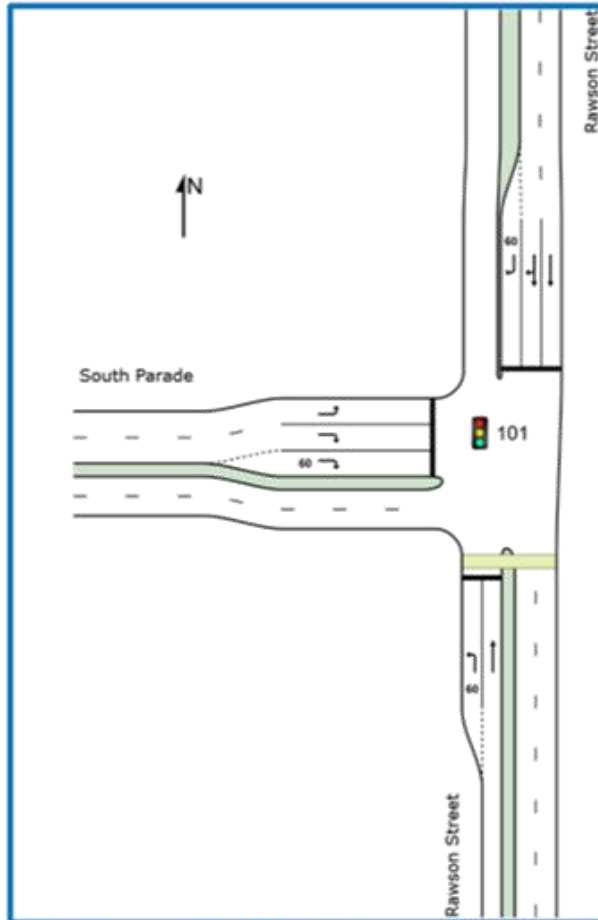


Figure 6c: Signalised intersection of Rawson Street with South Parade (SIDRA)



Figure 6d: Signalised intersection of Rawson Street with South Parade Aerial View
*Traffic Impact Assessment for a Re-Zoning Application for Medical Centre with Office
25 South Parade, Auburn NSW [A221755N Report2a]*



2.7. Existing Traffic Volume

As part of the traffic assessment, traffic counts have been undertaken at the above-mentioned intersections and the AM peak hours are identified accordingly. The AM peak hour is 8:00AM to 9AM and the PM peak hour is 5pm to 6pm. The traffic survey were undertaken on a weekday in April 2022. The following Figures present the traffic volumes in vehicles for the weekday peak hours. The bracketed numbers are trucks or buses. The un-bracketed numbers are cars.

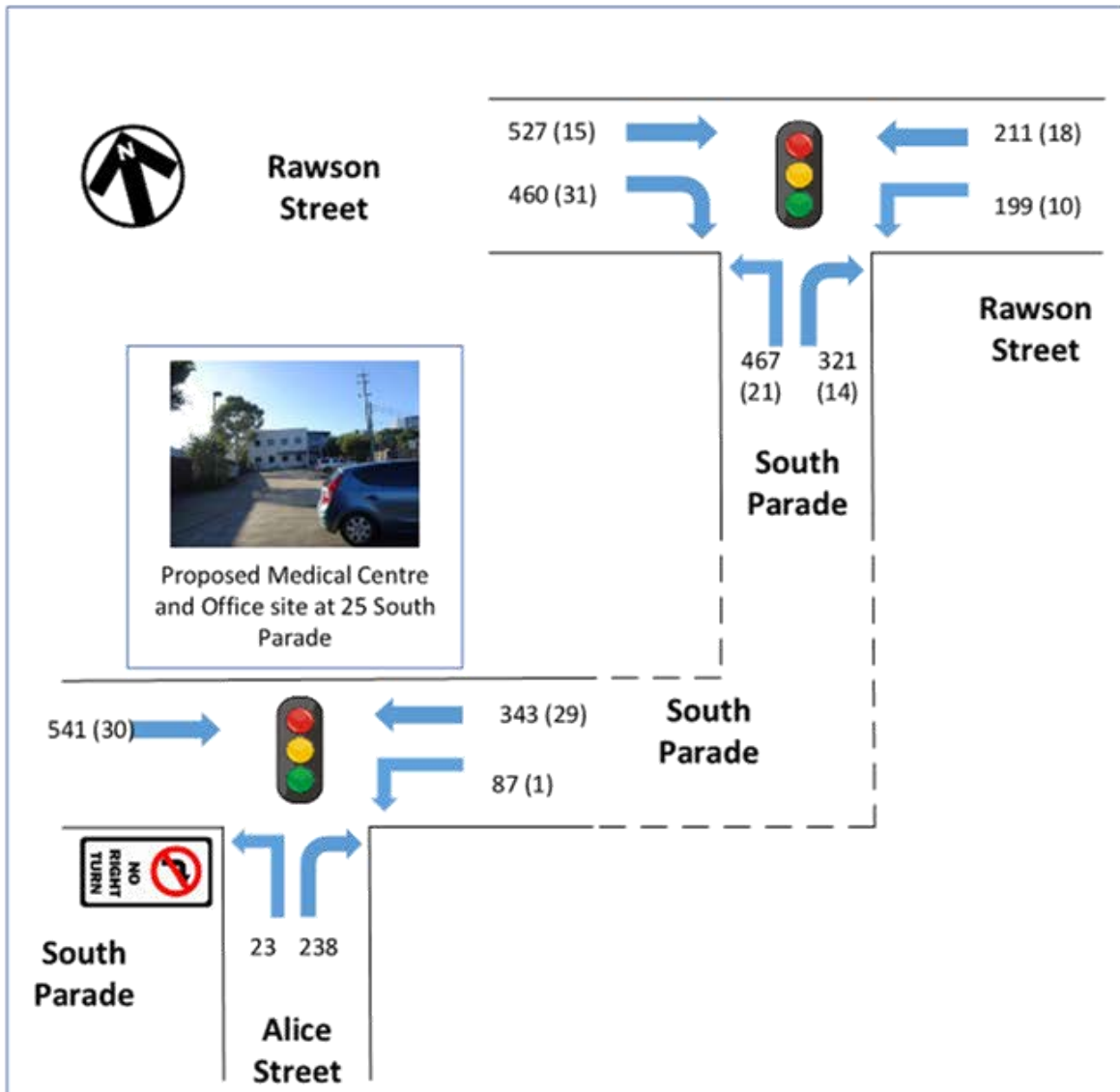


Figure 8a: Existing Weekday Traffic Volumes AM Peak Hour

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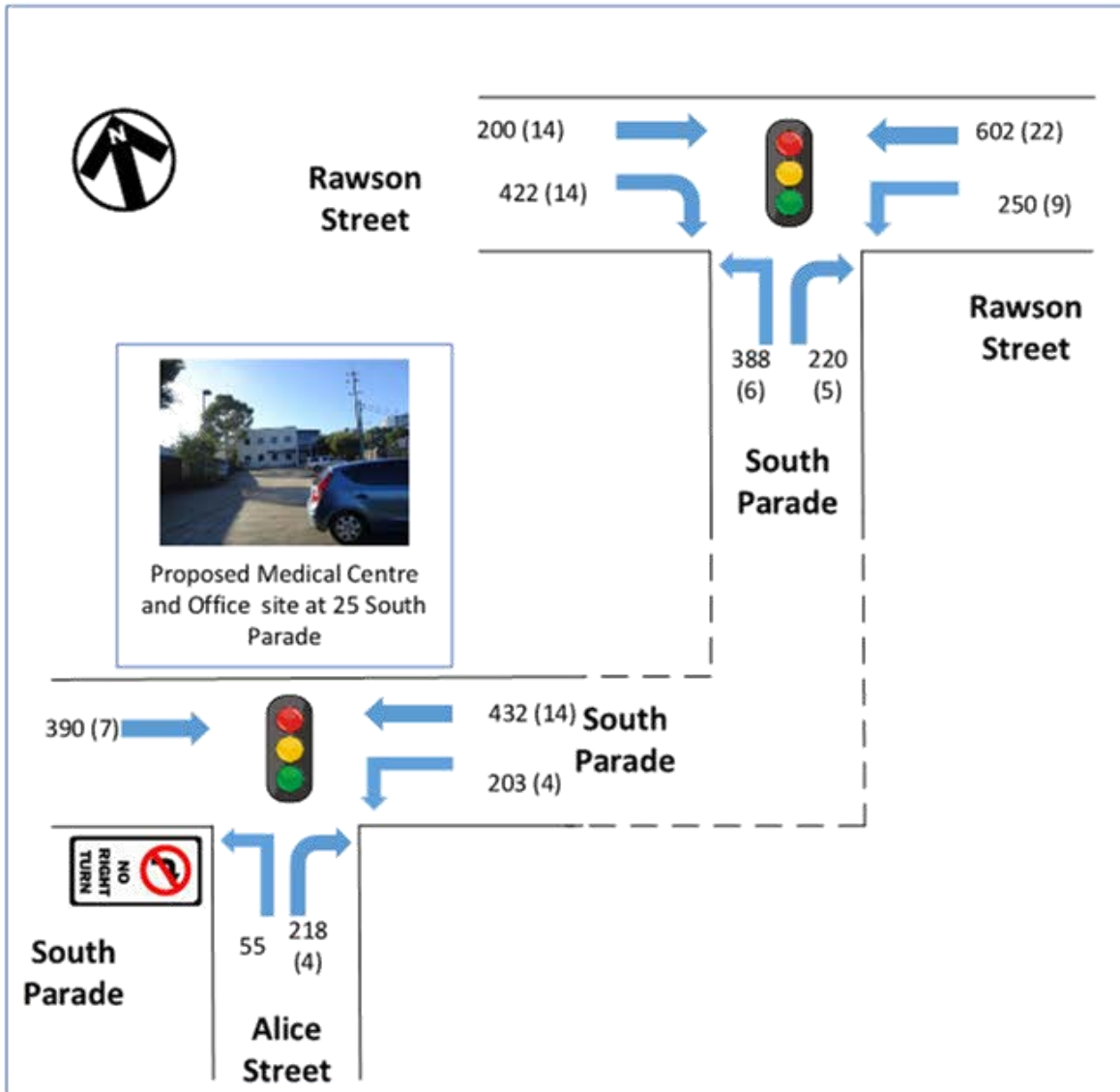


Figure 8b: Existing Weekday Traffic Volumes PM Peak Hour

2.8. Intersection Assessment with Existing Traffic

An intersection assessment has been undertaken for the:

- Signalised intersection of South Parade with Alice Street
- Signalised intersection of Rawson Street with South Parade

The existing intersection operating performance was assessed using the SIDRA software package (version 9) to determine the Degree of Saturation (DS), Average Delay (AVD in seconds) and Level of Service (LoS) at each intersection. The SIDRA program provides Level of Service Criteria Tables for various intersection types. The key indicator of intersection performance is Level of Service, where results are placed on a continuum from 'A' to 'F', as shown in Table 2.

*Traffic Impact Assessment for a Re-Zoning Application for Medical Centre with Office
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LoS	Traffic Signal / Roundabout	Give Way / Stop Sign / T-Junction control
A	Good operation	Good operation
B	Good with acceptable delays and spare capacity	Acceptable delays and spare capacity
C	Satisfactory	Satisfactory, but accident study required
D	Operating near capacity	Near capacity & accident study required
E	At capacity, at signals incidents will cause excessive delays.	At capacity, requires other control mode
F	Unsatisfactory and requires additional capacity, Roundabouts require other control mode	At capacity, requires other control mode

Table 2: Intersection Level of Service

The Average Vehicle Delay (AVD) provides a measure of the operational performance of an intersection as indicated below, which relates AVD to LOS. The AVD's should be taken as a guide only as longer delays could be tolerated in some locations (i.e. inner city conditions) and on some roads (i.e. minor side street intersecting with a major arterial route). For traffic signals, the average delay over all movements should be taken. For roundabouts and priority control intersections (sign control) the critical movement for level of service assessment should be that movement with the highest average delay.

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LoS	Average Delay per Vehicles (seconds/vehicle)
A	Less than 14
B	15 to 28
C	29 to 42
D	43 to 56
E	57 to 70
F	>70

Table 3: Intersection Average Delay (AVD)

The degree of saturation (DS) is another measure of the operational performance of individual intersections. For intersections controlled by traffic signals both queue length and delay increase rapidly as DS approaches 1. It is usual to attempt to keep DS to less than 0.9. Degrees of Saturation in the order of 0.7 generally represent satisfactory intersection operation. When DS exceed 0.9 queues can be anticipated.

The intersection has been assessed as a single network and the results of the intersection analysis are as follows:

Intersection/ Performance criteria	AM Peak Hour Existing	PM Peak Hour Existing
South Parade /Alice Street		
<i>LoS</i>	A	B
<i>AVD</i>	5.8	10.1
<i>DS</i>	0.43	0.44
Rawson Street / South Parade		
<i>LoS</i>	B	C
<i>AVD</i>	20.4	23.4
<i>DS</i>	0.67	0.95

Table 4: Existing Intersection Performances

As presented in Table 4, the above mentioned intersection is currently operating at a good condition Overall, there is spare capacity to accommodate the additional traffic.

The full intersection results are presented in Appendix A.

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2.9. Conclusion of existing conditions

The Proposed Medical centre with office is located in an area where there are a reasonable number of vacant car spaces on a weekday along South Parade and Alice Street.

The nearby intersection performs well with spare capacity to accommodate additional traffic.

The site has excellent access to public transport.

It is recommended that a pedestrian crossing is constructed on the western approach of the signalised intersection of South Parade with Alice Street to provide pedestrian access and safety.

In order to provide pedestrian safety and to encourage public transport use of any activity at the site, it is highly recommended that a pedestrian crossing on the western approach be constructed at the signalised intersection of South Parade with Alice Street. This is an existing infrastructure deficiency.

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3. PROPOSED MEDICAL CENTRE WITH OFFICE

A description of the re-zoning application for which approval is now sought features the following:

- Change zoning to allow for a medical premise and offices
- The total number of the consulting room is three rooms
- The total GFA of the office is approximately 520 m²
- The expected operating hours for both offices and medical premise on weekday are 8:00AM–5:00PM and on Saturday from 8am to 12pm. Closed on Saturday and Sunday Public holidays.

If the re-zoning is approved, a separate Development Application with a detailed design will be submitted with compliance with Council's Local Environment Plan and Development Control Plan for all designing, planning and engineering.

3.1. Car Parking

An existing car park is located on the on the ground level. Access and egress to the ground level is via a two-way driveway runs off South Parade.

- 22 car spaces including one accessible parking space

4. PARKING REQUIREMENTS

4.1. Car Parking

The *Cumberland Development Control Plan 2021* stipulates minimum car parking rates for a medical premise and offices as follows:

- 3 spaces per consultant room for medical premise
- 1 space per 40m² GFA for offices

Table 4a below presents the minimum car parking requirement for the proposed medical premise and offices based on the car parking rates listed above

Use	Number Consulting rooms	Car parking rate	Car Spaces Required	Car Spaces Provided
Consultant room	3	3 spaces per consultant room	9	22
Offices	520	1 space per 40 m ²	13	
Total			22	

Table 4: Summary of DCP Car Parking Requirements for a medical premise

As presented in Table 4 above, the proposed medical premise and offices complies with the minimum car parking requirement as required by the *Cumberland Development Control Plan 2021*.

Moreover, since the proposed medical premise is located within walking distance of Auburn train station it is estimated that the use of public transport will reduce the car parking requirements.

4.2. Accessible parking

The *Cumberland Development Control Plan 2021* does not outline the requirements of accessible parking area for a Medical centre with office/Medical premise. However, one accessible parking is provided.

4.3. Bicycle parking

Cumberland Development Control Plan 2021 states the following businesses and office bicycle rates as follows:

- 1 spaces per ten staff for staff bicycle spaces
- 1 space per 750m for visitors for areas more than 1,000m²

There is sufficient area at the ground level car park area to provide bicycle parking for staff and visitors for business premises.

5. TRAFFIC GENERATION AND IMPACT

Proposed Traffic Generation for Medical centre with office

The *NSW RTA Guide to Traffic Generating Developments 2002* outlines the trip generation rates for a medical premise/ Offices premise as follows

Medical premise

- 10.4 trips per 100m² for AM peak hour
- 8.8 trips per 100m² for PM peak hour
- The estimated consultant room size is 18m² per room and the total number of the consulting room is three rooms

Offices premise

- 2 trips per 100m² for AM and PM peak hour

Application of the above-mentioned trip rates to the proposed Medical centre with office results the peak hour trip generation presented in Table 5a and 5b below:

Peak Hour	Use	GFA(m2)	Trip Generation Rate (per 100m2)	Trip Generated
AM	Medical centre	54	10.4	6
PM			8.8	5

Table 5a: Trips generated by the proposed medical premise in weekday peak hours

Peak Hour	Use	GFA(m2)	Trip Generation Rate (per 100m2)	Trip Generated
AM	Office	520	2	10
PM			2	10

Table 5b: Trips generated by the proposed offices in weekday peak hours

5.1. Trip Distribution

The proposed Medical centre with office is a low trip generator in both AM and PM peak hours.

Table 6a shows the trip calculation from the proposed medical premise trips and distributed to the road network assuming 50 percent arrivals and 50 percent departure for the AM peak hour. The PM peak hour assumes 50 percent arrival and 50 percent departure

Table 6b shows the trip calculation from the proposed offices trips and distributed to the road network assuming and 80 percent departure for the offices and 20 percent arrivals. The PM peak hour assumes 20 percent arrival and 80 percent departure

Table 6c shows the total net trip calculation from the proposed Medical centre with office trips and distributed to the road network



	Peak Hour	Origin	Destination	Net Trips
Medical centre	AM	3	3	6
	PM	2	2	5

Table 6a: Summary of the proposed medical premise trip distribution

	Peak Hour	Origin	Destination	Net Trips
Office	AM	2	8	10
	PM	8	2	10

Table 6a: Summary of the proposed offices trip distribution

	Peak Hour	Origin	Destination	Net Trips
Medical centre with office	AM	5	11	16
	PM	11	4	15

Table 6a: Summary of the total trip distribution for the proposed Medical centre with office

5.2. Existing Traffic Volume with Medical centre with office traffic

The additional development trips are assigned onto the local traffic network. The following figures present the traffic volume with the development trips (in red for origin trips and blue for destination trips) for the weekday AM and PM peak hours.

The additional development trips represent a small proportion of the existing traffic volumes.

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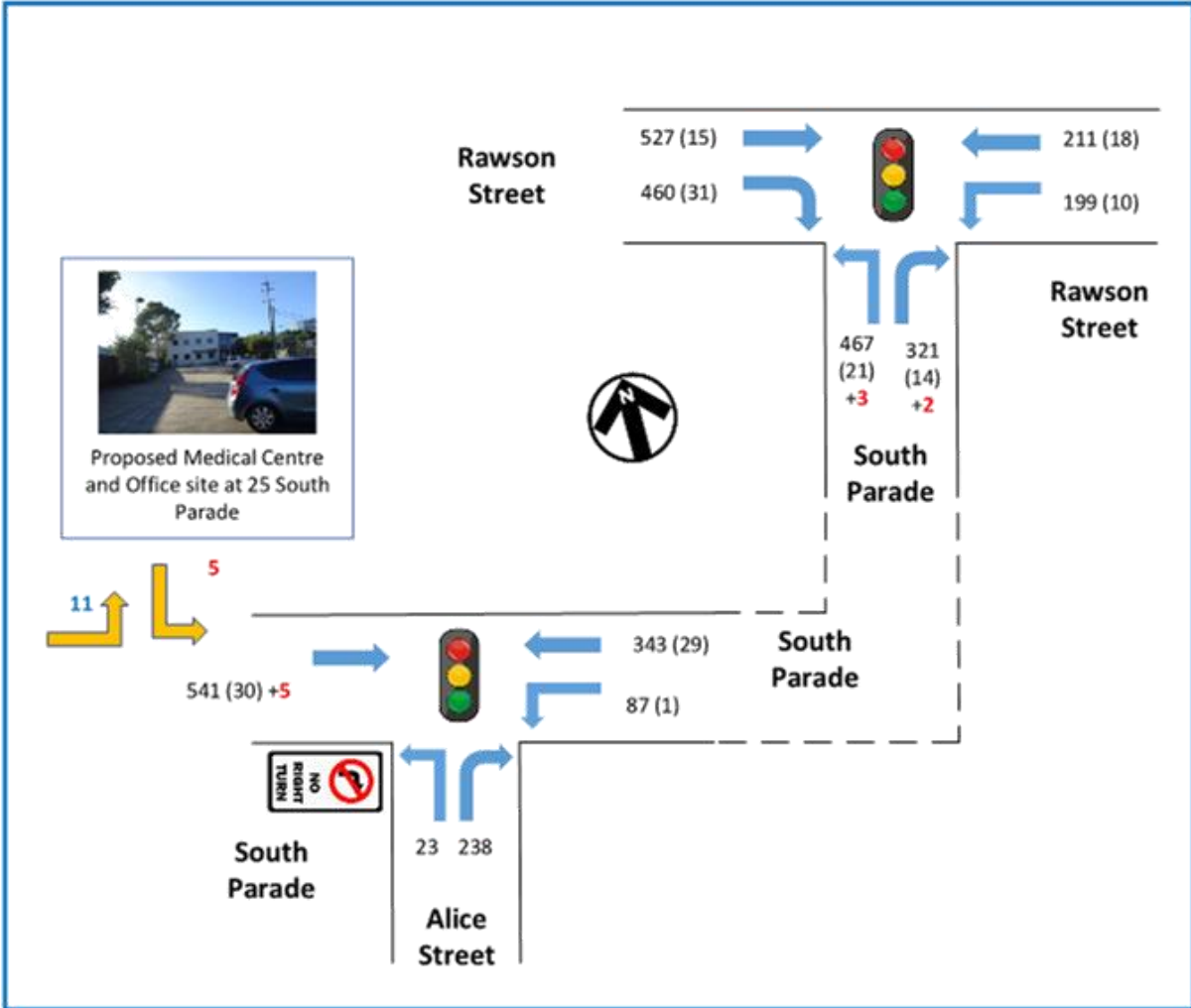


Figure 9a: Existing Weekday Traffic Volumes with Medical centre with office traffic AM Peak Hour

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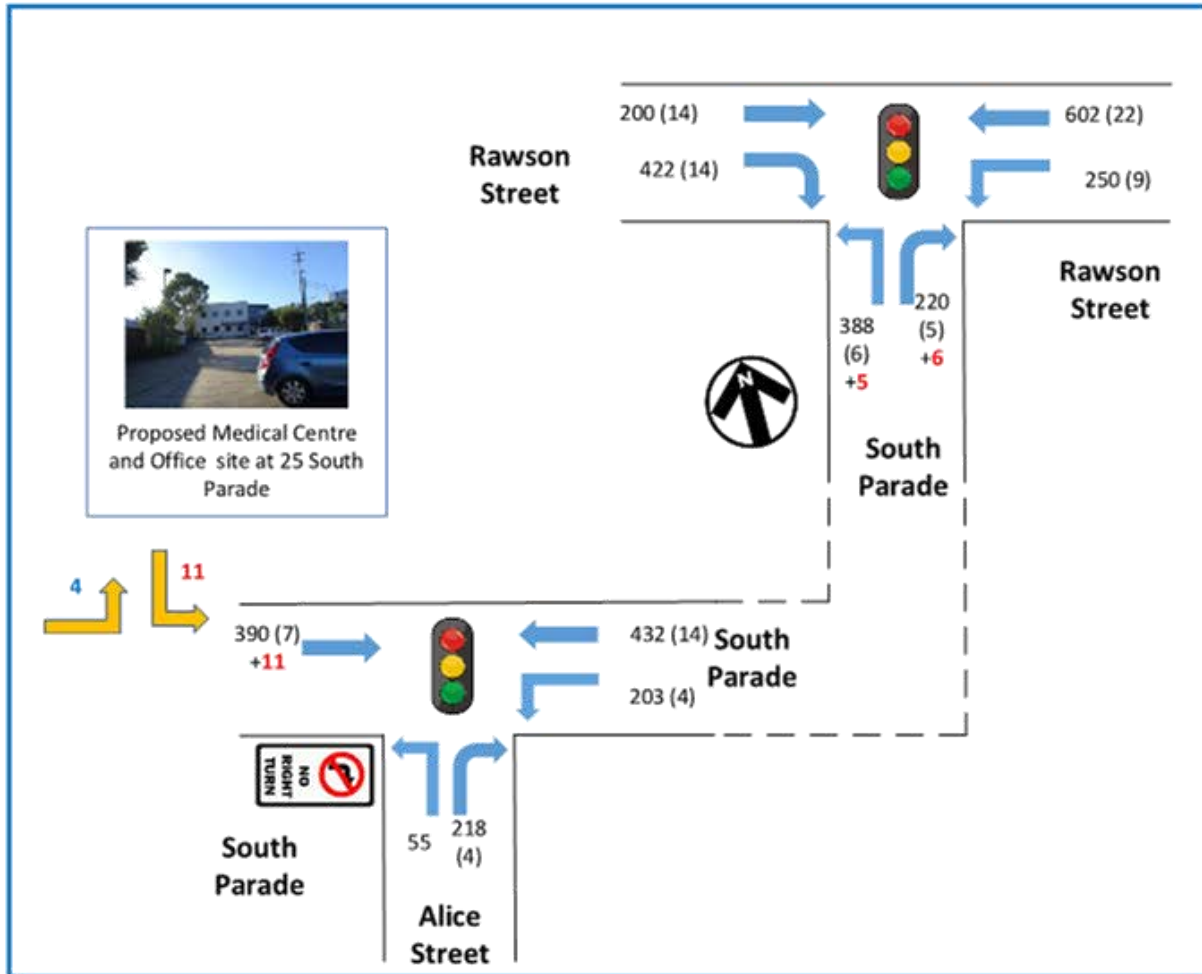


Figure 9b: Existing Weekday Traffic Volumes with Medical centre with office traffic PM Peak Hour



5.3. Traffic Impact

This section assesses the following intersections for the existing traffic with the Medical centre with office traffic. The intersections are assessed as a single network. The results of the intersection assessment are as follows:

Intersection/ Performance criteria	Performance with Existing Traffic		Projected Performance with Existing and Medical centre with office traffic	
	AM Peak Hour Existing	PM Peak Hour Existing	AM Peak Hour Projected	PM Peak Hour Projected
South Parade / Alice Street				
LoS	A	B	A	B
AVD	5.8	10.1	5.8	10.1
DS	0.43	0.44	0.43	0.44
Rawson Street / South Parade				
LoS	B	C	B	C
AVD	20.4	23.4	20.4	23.8
DS	0.67	0.95	0.68	0.95

Table 7: Projected intersection performance with d Medical centre with office traffic

As presented in Table 7 above, the additional trips generated by the proposed Medical centre with office have minimum impact on the intersection performances in both AM and PM peak hours. The LoS, AVD and DS of each intersection are not significantly affected by the addition of Medical centre with office traffic.

The traffic impacts of the proposed Medical centre with office are therefore considered acceptable.

The full SIDRA results are presented in Appendix B for the intersection assessment with the Medical centre with office traffic.

ML

6. CONCLUSIONS

This traffic impact assessment reports relates to a proposed Medical centre with office for a re-zoning application at *25 South Parade in Auburn*. Based on the analysis and discussions presented in this report, the following conclusions are made:

- The Medical centre with office is located in a *General Industrial (INI) zone* with excellent access to local public transport service. Vacant on-street parking spaces and a public car park can be located along South Parade and Alice Street.
- The two nearby intersections have good level of service with additional spare capacity
- In order to provide pedestrian safety and to encourage public transport use of any activity at the site, it is highly recommended that a pedestrian crossing on the western approach be constructed at the signalised intersection of South Parade with Alice Street. This is an existing infrastructure deficiency.
- The car parking requirements specified in the *Cumberland Development Control Plan 2021* can be met. The proposed car parking provisions are considered acceptable.
- The proposed Medical centre with office is expected to generate low number of additional trips in both AM and PM peak hours for a medical facility and offices.
- According to the intersection assessment, the additional trips can be accommodated in the nearby intersections without significantly affecting the performance of any turn movement, approach arm or the overall intersection. The traffic impacts of the proposed Medical centre with office are therefore considered acceptable.

There are no traffic engineering reasons why a re-zoning application for the proposed Medical centre with office at 25 South Parade, Auburn NSW should be refused.



APPENDIX A

INTERSECTION ASSESSMENT FOR EXISTING TRAFFIC

Vehicle Movement Performance																
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	Aver. Back Of Queue		Prop. Que	Stop Rate	Eff. Rate	Aver. No. of Cycles	Aver. Speed
			[Total	HV]	[Total	HV]				[Veh.	Dist]					
			veh/h	%	veh/h	%	v/c	sec		veh	m					km/h
South: Alice Street																
1	L2	All MCs	24	0.0	24	0.0	0.042	19.9	LOS B	0.3	2.1	0.72	0.67	0.72	30.6	
3	R2	All MCs	251	0.0	251	0.0	* 0.433	22.5	LOS B	3.7	25.6	0.84	0.78	0.84	12.0	
Approach			275	0.0	275	0.0	0.433	22.3	LOS B	3.7	25.6	0.83	0.77	0.83	14.9	
East: South Parade																
4	L2	All MCs	93	1.1	93	1.1	0.086	4.3	LOS A	0.5	3.2	0.37	0.55	0.37	29.3	
5	T1	All MCs	392	7.8	392	7.8	* 0.430	15.8	LOS B	5.8	43.2	0.88	0.65	0.88	34.6	
Approach			484	6.5	484	6.5	0.430	13.6	LOS A	5.8	43.2	0.78	0.63	0.78	34.1	
West: South Parade																
11	T1	All MCs	601	5.3	601	5.3	0.326	10.3	LOS A	3.3	24.4	0.65	0.56	0.65	36.8	
Approach			601	5.3	601	5.3	0.326	10.3	LOS A	3.3	24.4	0.65	0.56	0.65	36.8	
All Vehicles			1360	4.6	1360	4.6	0.433	13.9	LOS A	5.8	43.2	0.73	0.63	0.73	32.1	

Table A1: Weekday Signalised Network Intersection Performance of South Parade with Alice Street for the AM Peak Hour

Vehicle Movement Performance																
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	Aver. Back Of Queue		Prop. Que	Stop Rate	Eff. Rate	Aver. No. of Cycles	Aver. Speed
			[Total	HV]	[Total	HV]				[Veh.	Dist]					
			veh/h	%	veh/h	%	v/c	sec		veh	m					km/h
South: Rawson Street																
1	L2	All MCs	220	4.8	220	4.8	0.619	29.8	LOS C	3.8	28.0	0.96	0.83	1.00	21.3	
2	T1	All MCs	241	7.9	241	7.9	* 0.660	25.7	LOS B	4.3	32.0	0.97	0.85	1.04	34.7	
Approach			461	6.4	461	6.4	0.660	27.7	LOS B	4.3	32.0	0.97	0.84	1.02	29.9	
North: Rawson Street																
8	T1	All MCs	571	2.8	571	2.8	0.583	10.9	LOS A	7.2	51.3	0.74	0.66	0.74	42.1	
9	R2	All MCs	517	6.3	517	6.3	* 0.678	29.9	LOS C	4.6	34.0	0.97	0.87	1.06	27.9	
Approach			1087	4.5	1087	4.5	0.678	19.9	LOS B	7.2	51.3	0.85	0.76	0.89	35.5	
West: South Parade																
10	L2	All MCs	514	4.3	514	4.3	0.458	14.7	LOS B	6.5	47.5	0.76	0.68	0.76	36.2	
12	R2	All MCs	353	4.2	353	4.2	* 0.333	20.4	LOS B	2.3	16.5	0.74	0.74	0.74	28.2	
Approach			866	4.3	866	4.3	0.458	17.0	LOS B	6.5	47.5	0.75	0.70	0.75	33.2	
All Vehicles			2415	4.8	2415	4.8	0.678	20.4	LOS B	7.2	51.3	0.84	0.75	0.87	33.6	

Table A2: Weekday signalised Network Intersection Performance of Rawson Street with South Parade for the AM Peak Hour

*Traffic Impact Assessment for a Re-Zoning Application for Medical Centre with Office
25 South Parade, Auburn NSW [A221755N Report2a]*



Vehicle Movement Performance																
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	Aver. Back Of Queue		Prop. Que	Stop Rate	Eff. Rate	Aver. No. of Cycles	Aver. Speed
			[Total	HV]	[Total	HV]				[Veh.	Dist]					
			veh/h	%	veh/h	%	v/c	sec		veh	m					km/h
South: Alice Street																
1	L2	All MCs	58	0.0	58	0.0	0.106	29.1	LOS C	1.1	7.9	0.76	0.71	0.76	26.3	
3	R2	All MCs	234	1.8	234	1.8	* 0.432	32.1	LOS C	5.1	36.4	0.85	0.79	0.85	9.1	
Approach			292	1.4	292	1.4	0.432	31.5	LOS C	5.1	36.4	0.83	0.77	0.83	14.1	
East: South Parade																
4	L2	All MCs	218	1.9	218	1.9	0.139	3.5	LOS A	0.1	0.5	0.02	0.46	0.02	31.4	
5	T1	All MCs	469	3.1	469	3.1	* 0.440	19.4	LOS B	10.1	72.6	0.86	0.58	0.86	32.2	
Approach			687	2.8	687	2.8	0.440	14.3	LOS A	10.1	72.6	0.60	0.54	0.60	32.1	
West: South Parade																
11	T1	All MCs	418	1.8	418	1.8	0.207	10.2	LOS A	3.0	21.2	0.52	0.44	0.52	36.9	
Approach			418	1.8	418	1.8	0.207	10.2	LOS A	3.0	21.2	0.52	0.44	0.52	36.9	
All Vehicles			1397	2.2	1397	2.2	0.440	16.7	LOS B	10.1	72.6	0.62	0.56	0.62	29.5	

Table A3: Weekday Signalised Network Intersection Performance of South Parade with Alice Street for the PM Peak Hour

Vehicle Movement Performance																
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	Aver. Back Of Queue		Prop. Que	Stop Rate	Eff. Rate	Aver. No. of Cycles	Aver. Speed
			[Total	HV]	[Total	HV]				[Veh.	Dist]					
			veh/h	%	veh/h	%	v/c	sec		veh	m					km/h
South: Rawson Street																
1	L2	All MCs	273	3.5	273	3.5	0.342	32.0	LOS C	4.8	34.6	0.70	0.75	0.70	24.9	
2	T1	All MCs	657	3.5	657	3.5	* 0.949	62.6	LOS E	23.8	171.8	1.00	1.24	1.39	26.3	
Approach			929	3.5	929	3.5	0.949	53.6	LOS D	23.8	171.8	0.91	1.10	1.19	26.1	
North: Rawson Street																
8	T1	All MCs	225	6.5	225	6.5	0.180	5.6	LOS A	2.2	16.2	0.39	0.33	0.39	45.6	
9	R2	All MCs	459	3.2	459	3.2	* 0.901	58.8	LOS E	8.7	62.4	1.00	1.10	1.44	19.5	
Approach			684	4.3	684	4.3	0.901	41.3	LOS C	8.7	62.4	0.80	0.85	1.09	25.9	
West: South Parade																
10	L2	All MCs	415	1.5	415	1.5	0.516	27.6	LOS B	8.8	62.4	0.84	0.82	0.84	29.8	
12	R2	All MCs	237	2.2	237	2.2	* 0.331	27.5	LOS B	2.1	14.9	0.67	0.71	0.67	24.7	
Approach			652	1.8	652	1.8	0.516	27.6	LOS B	8.8	62.4	0.78	0.78	0.78	28.2	
All Vehicles			2265	3.3	2265	3.3	0.949	42.4	LOS C	23.8	171.8	0.84	0.93	1.04	26.5	

Table A4: Weekday signalised Network Intersection Performance of Rawson Street with South Parade for the PM Peak Hour



APPENDIX B

INTERSECTION ASSESSMENT WITH MEDICAL CENTRE WITH OFFICE TRAFFIC

Vehicle Movement Performance																
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	Aver. Back Of Queue		Prop. Que	Stop Rate	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[Total	HV]	[Total	HV]				[Veh.	Dist]					
			veh/h	%	veh/h	%	v/c	sec		veh	m					km/h
South: Alice Street																
1	L2	All MCs	24	0.0	24	0.0	0.042	19.9	LOS B	0.3	2.1	0.72	0.67	0.72	30.6	
3	R2	All MCs	251	0.0	251	0.0	* 0.433	22.5	LOS B	3.7	25.6	0.84	0.78	0.84	12.0	
Approach			275	0.0	275	0.0	0.433	22.3	LOS B	3.7	25.6	0.83	0.77	0.83	14.9	
East: South Parade																
4	L2	All MCs	93	1.1	93	1.1	0.086	4.3	LOS A	0.5	3.2	0.37	0.55	0.37	29.3	
5	T1	All MCs	392	7.8	392	7.8	* 0.430	15.8	LOS B	5.8	43.2	0.88	0.65	0.88	34.6	
Approach			484	6.5	484	6.5	0.430	13.6	LOS A	5.8	43.2	0.78	0.63	0.78	34.1	
West: South Parade																
11	T1	All MCs	606	5.2	606	5.2	0.329	10.3	LOS A	3.4	24.6	0.65	0.56	0.65	36.7	
Approach			606	5.2	606	5.2	0.329	10.3	LOS A	3.4	24.6	0.65	0.56	0.65	36.7	
All Vehicles			1365	4.6	1365	4.6	0.433	13.9	LOS A	5.8	43.2	0.73	0.63	0.73	32.1	

Table B1: Weekday Signalised Network Intersection Performance of South Parade with Alice Street for the AM Peak Hour with Medical centre with office Traffic

Vehicle Movement Performance																
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	Aver. Back Of Queue		Prop. Que	Stop Rate	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[Total	HV]	[Total	HV]				[Veh.	Dist]					
			veh/h	%	veh/h	%	v/c	sec		veh	m					km/h
South: Rawson Street																
1	L2	All MCs	220	4.8	220	4.8	0.619	29.8	LOS C	3.8	28.0	0.96	0.83	1.00	21.3	
2	T1	All MCs	241	7.9	241	7.9	* 0.660	25.7	LOS B	4.3	32.0	0.97	0.85	1.04	34.7	
Approach			461	6.4	461	6.4	0.660	27.7	LOS B	4.3	32.0	0.97	0.84	1.02	29.9	
North: Rawson Street																
8	T1	All MCs	571	2.8	571	2.8	0.583	10.9	LOS A	7.2	51.3	0.74	0.66	0.74	42.1	
9	R2	All MCs	517	6.3	517	6.3	* 0.678	29.9	LOS C	4.6	34.0	0.97	0.87	1.06	27.9	
Approach			1087	4.5	1087	4.5	0.678	19.9	LOS B	7.2	51.3	0.85	0.76	0.89	35.5	
West: South Parade																
10	L2	All MCs	517	4.3	517	4.3	0.461	14.8	LOS B	6.6	47.9	0.76	0.68	0.76	36.2	
12	R2	All MCs	356	4.1	356	4.1	* 0.336	20.4	LOS B	2.3	16.7	0.74	0.74	0.74	28.1	
Approach			873	4.2	873	4.2	0.461	17.1	LOS B	6.6	47.9	0.75	0.70	0.75	33.2	
All Vehicles			2421	4.7	2421	4.7	0.678	20.4	LOS B	7.2	51.3	0.84	0.75	0.87	33.6	

Table B2: Weekday signalised Network Intersection Performance of Rawson Street with South Parade for the AM Peak Hour with Medical centre with office Traffic'

Traffic Impact Assessment for a Re-Zoning Application for Medical Centre with Office
25 South Parade, Auburn NSW [A221755N Report2a]



Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	Aver. Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[Total	HV]	[Total	HV]				[Veh.	Dist]				
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Alice Street															
1	L2	All MCs	58	0.0	58	0.0	0.106	29.1	LOS C	1.1	7.9	0.76	0.71	0.76	26.3
3	R2	All MCs	234	1.8	234	1.8	* 0.432	32.1	LOS C	5.1	36.4	0.85	0.79	0.85	9.1
Approach			292	1.4	292	1.4	0.432	31.5	LOS C	5.1	36.4	0.83	0.77	0.83	14.1
East: South Parade															
4	L2	All MCs	218	1.9	218	1.9	0.139	3.5	LOS A	0.1	0.5	0.02	0.46	0.02	31.4
5	T1	All MCs	469	3.1	469	3.1	* 0.440	19.4	LOS B	10.1	72.6	0.86	0.58	0.86	32.2
Approach			687	2.8	687	2.8	0.440	14.3	LOS A	10.1	72.6	0.60	0.54	0.60	32.1
West: South Parade															
11	T1	All MCs	429	1.7	429	1.7	0.215	10.2	LOS A	3.1	22.1	0.52	0.44	0.52	36.8
Approach			429	1.7	429	1.7	0.215	10.2	LOS A	3.1	22.1	0.52	0.44	0.52	36.8
All Vehicles			1408	2.2	1408	2.2	0.440	16.7	LOS B	10.1	72.6	0.62	0.56	0.62	29.5

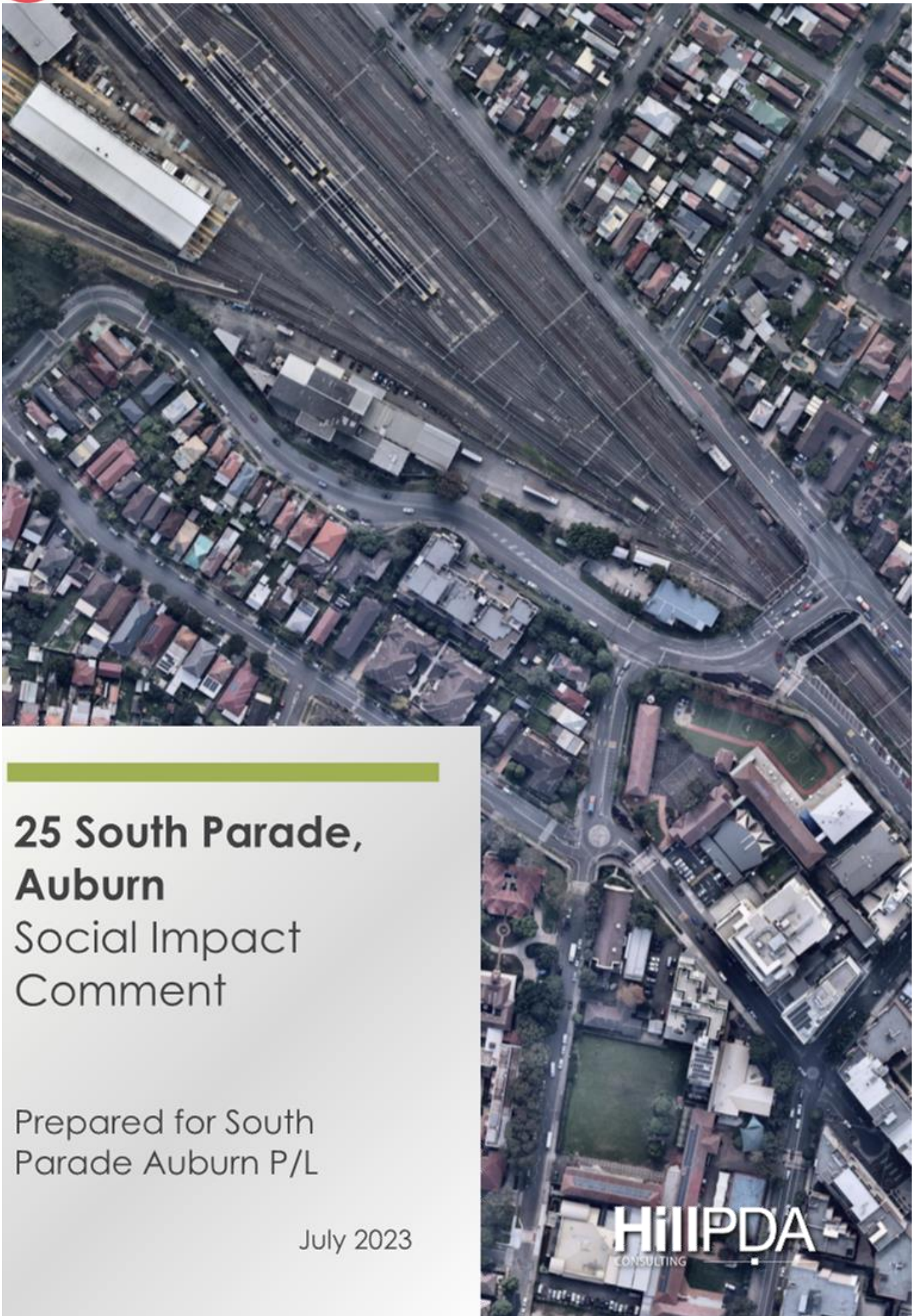
Table B3: Weekday Signalised Network Intersection Performance of South Parade with Alice Street for the PM Peak Hour with Medical centre with office Traffic

Vehicle Movement Performance															
Mov ID	Turn	Mov Class	Demand Flows		Arrival Flows		Deg. Satn	Aver. Delay	Level of Service	Aver. Back Of Queue		Prop. Que	Eff. Stop Rate	Aver. No. of Cycles	Aver. Speed
			[Total	HV]	[Total	HV]				[Veh.	Dist]				
			veh/h	%	veh/h	%	v/c	sec		veh	m				km/h
South: Rawson Street															
1	L2	All MCs	273	3.5	273	3.5	0.342	32.0	LOS C	4.8	34.6	0.70	0.75	0.70	24.9
2	T1	All MCs	657	3.5	657	3.5	* 0.949	62.6	LOS E	23.8	171.8	1.00	1.24	1.39	26.3
Approach			929	3.5	929	3.5	0.949	53.6	LOS D	23.8	171.8	0.91	1.10	1.19	26.1
North: Rawson Street															
8	T1	All MCs	225	6.5	225	6.5	0.180	5.6	LOS A	2.2	16.2	0.39	0.33	0.39	45.6
9	R2	All MCs	459	3.2	459	3.2	* 0.901	58.8	LOS E	8.7	62.4	1.00	1.10	1.44	19.5
Approach			684	4.3	684	4.3	0.901	41.3	LOS C	8.7	62.4	0.80	0.85	1.09	25.9
West: South Parade															
10	L2	All MCs	420	1.5	420	1.5	0.522	27.8	LOS B	9.0	63.6	0.85	0.82	0.85	29.7
12	R2	All MCs	243	2.2	243	2.2	* 0.340	27.9	LOS B	2.2	15.5	0.68	0.71	0.68	24.5
Approach			663	1.7	663	1.7	0.522	27.9	LOS B	9.0	63.6	0.79	0.78	0.79	28.1
All Vehicles			2277	3.2	2277	3.2	0.949	42.4	LOS C	23.8	171.8	0.84	0.93	1.04	26.5

Table B4: Weekday signalised Network Intersection Performance of Rawson Street with South Parade for the PM Peak Hour with Medical centre with office Traffic

**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 4
Social Impact Comment**



25 South Parade, Auburn

Social Impact Comment

Prepared for South
Parade Auburn P/L

July 2023

HiIPDA
CONSULTING

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Quality control

This document is for discussion purposes only unless signed and dated by a HillPDA project director.

Reviewer

Signature



Dated

13 July 2023

Report details

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File name	P23001 - 25 South Parade, Auburn SIC
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1.0 INTRODUCTION

This social impact comment (SIC) has been prepared by HillPDA for South Parade Auburn P/L to accompany a Planning Proposal to Cumberland City Council. The planning proposal seeks to amend the Cumberland Local Environmental Plan (Cumberland LEP) 2021 to allow additional permitted uses at 25 South Parade, Auburn (the site).

The site is zoned E4 General Industrial under the Cumberland LEP, enabling a range of industrial and warehouse land uses and providing for employment opportunities, whilst prohibiting other land uses including medical centre and office premises. Nonetheless, development consent was granted under DA249/00 in September 2000 allowing the construction of an office premises development on the site. Subsequently, the site has been in use as office premises.

The proponent is preparing a Planning Proposal to provide for additional permitted uses at the site whilst retaining the current zoning. The additional permitted uses proposed are medical centre and office premises.

This SIC has been prepared to accompany the Planning Proposal to address the need to identify social impacts of the proposed change.

1.1 The Planning Proposal

The planning proposal seeks to amend the Cumberland LEP to:

- Include a clause identifying Lot 2, DP 806999 under *Schedule 1 Additional permitted uses* of the LEP; and add it to the *Additional Permitted Uses Map*; and
- Include a clause that permits (with consent) development for the purposes of medical centre and office premises at Lot 2, DP 806999.

This report considers the potential social impacts to arise from the proposed amendments to the Cumberland LEP. Social matters relating to previous approvals at the site, including the construction of the current two storey office building, do not form part of the assessment.

1.2 The site

The site is located at 25 South Parade, Auburn, legally identified as Lot 2, DP 806999. The site is located approximately 16 kilometres west of the Sydney CBD and four kilometres southeast of the Parramatta CBD. The site is adjacent to the Auburn town centre, approximately 300m northwest of Auburn Railway Station. The location of the site is indicated in Figure 1.

The site has a total area of approximately 1,600 square metres, with approximately 100 metres of frontage to South Parade. South Parade bounds the site to the south, and it is bound to the northeast by the NSW Main Suburban rail line, and to the northwest by Lot 2, DP 827624. The site currently hosts a two-storey office building and at-grade car parking. The site is located within the Cumberland Local Government Area (LGA) and is zoned E4 General Industrial under the Cumberland LEP 2021.

Figure 1: The site



Source: HillPDA, Google satellite imagery (2022)

1.3 The surrounds

The land immediately surrounding the site consists of:

- The Main Suburban railway line to the northeast, with medium density residential development located beyond the railway line
- South Parade to the west and south of the site, with low and medium density residential development

- St John's Catholic Primary school, to the south of the site, also fronting South Parade
- Auburn town centre, to the southeast of the site, which hosts a mix of residential and commercial uses as well as Auburn railway station
- Rail and industrial land uses to the north and west of the site.

Aside from the small quantity of industrial-zoned land to the site's northwest, the surrounding area is predominantly characterised by a mix of residential, commercial, and office spaces, typical of a town centre. The site has excellent access to public transport networks, located approximately 300 metres from Auburn railway station, and approximately 150 metres from the nearest bus stop.

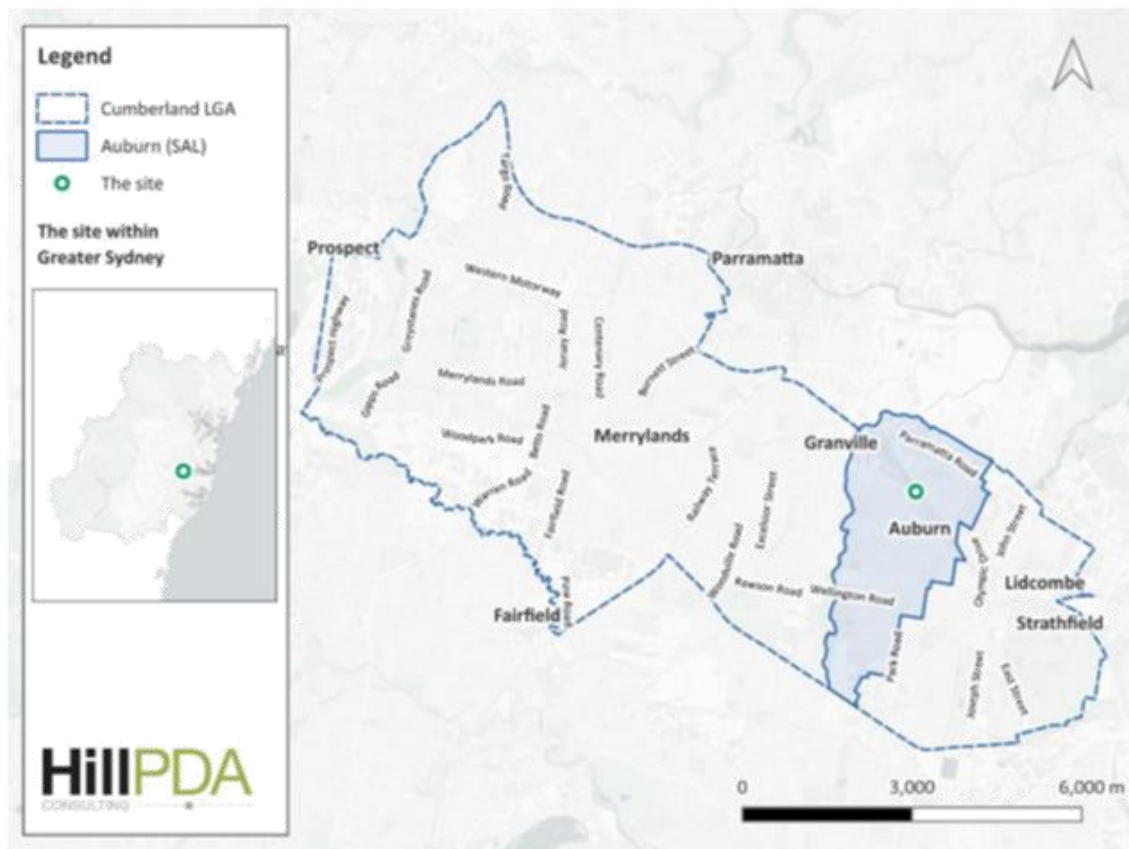
The site is also located close to key road transport routes, with the A6, the M4 Motorway and the A44 Great Western Highway providing access to the wider Sydney road network.

2.0 EXISTING SOCIAL ENVIRONMENT

2.1 The study area

The study area has been defined as Auburn SAL ('Suburb and Locality' under the Australian Statistical Geography Standard) as indicated in Figure 2. Demographic information for Auburn SAL has been compared with that of the Cumberland LGA and Greater Sydney, shown in the following section.

Figure 2: Study area



Source: HillPDA, CartoDB (2022) (base map)

2.2 Demographic analysis



The usual **resident population** of Auburn (SAL) in 2021 was 39,333, living in 12,921 private dwellings with an average household size of 3.3 persons.



In 2021 the **median age** in Auburn (SAL) was 31, younger than the median age in Cumberland LGA at 34 years and Greater Sydney, at 37 years.

There were 515 **people over the age of 85** living in Auburn (SAL) in 2021. This was somewhat below the proportion for Cumberland LGA and Greater Sydney. Auburn (SAL) had significantly higher proportions of residents **aged between 20 and 39 years old** than both Cumberland LGA and Greater Sydney.



In Auburn (SAL) in 2021, a **language other than English** was spoken in 88.9 per cent of households, a significantly higher proportion than that of the Cumberland LGA or Greater Sydney (73.9 per cent and 42 per cent, respectively).



As at the 2021 Census, 32.9 per cent of Auburn (SAL) residents were **attending a university or tertiary institution**, higher than the 26.2 per cent of residents attending tertiary education across Greater Sydney.

Approximately 32.7 per cent of Auburn (SAL) residents were reported as **attending primary or secondary school**, whilst 4.2 per cent were **attending preschool**. These figures were significantly lower than those across Greater Sydney, which recorded 47.0 per cent and 6.7 per cent respectively.



As of March 2022, 19,997 Auburn (SAL) residents were **in the labour force**. Of those residents in the labour force, 7.7 per cent were **unemployed**, a total of 1,547 persons, much higher than the rate across New South Wales of 3.3 per cent.



In 2021, 22.2 per cent of Auburn (SAL) households reported an **income of \$3,000 or more per week** compared to 32 per cent across Greater Sydney. In the same period, 10.8 per cent of households reported a **weekly income of less than \$650**, compared to 14.1 per cent across Greater Sydney.



In Auburn (SAL), 50.1 per cent of families were **couples with children** in 2021, compared with 53.1 per cent in Cumberland LGA and 48.4 percent in Greater Sydney.

Source: ABS QuickStats (2022), National Skills Commission *Labour Market Insights* (2022).

Overall, the local demography does not suggest the presence of any social issues pertaining specifically to the site, or that may be exacerbated by the proposal. The study area is notable for a high proportion of residents who speak a language other than English and low median age, as well as its relatively high unemployment rate.

2.3 Sensitive receivers

There are a variety of sensitive receivers in the vicinity of the site. Sensitive receivers are sites with occupants or users that may be disproportionately affected by any impacts arising from the proposal. HillPDA's analysis of nearby land uses has identified a small number of neighbouring properties that may be more sensitive to changes to the use of surrounding land. These are:

- Medium density residential developments located within 100m to the south-west of the site, with frontages to South Parade and Alice Street; and
- St John's Catholic Primary School at 77 Queen Street, Auburn.

The lots identified above are shown in Figure 3.

Figure 3: Potentially sensitive receivers near the site



Source: HillPDA, Google satellite imagery (2022)

Whilst these sensitive receivers would be vulnerable to the impacts of potential industrial development, the proposed medical centre and office premises uses are unlikely to have a significant effect within the site's context. These proposed additional permitted uses are aligned with much of the surrounding area, and would likely have a lower impact on any sensitive receivers than that of the major railway corridor and major road adjacent to the site. Additionally, the Planning Proposal seeks to align the planning regime for the site with the existing use at the site, suggesting that at least in the short term, sensitive receivers would not be exposed to change.

3.0 SOCIAL IMPACTS

A social impact is the effect of an activity on a community and the well-being of individuals and families. This section identifies potential changes to existing social conditions that may arise due to the Planning Proposal. Social impacts may include direct and indirect benefits and effects/impacts, as well as consideration of any cumulative impacts. These changes can be positive or negative; tangible or intangible; qualitative or quantitative; direct, indirect or cumulative; and subjectively experienced.

The analysis in this section represents a comment on likely social impacts rather than a full social impact assessment. This approach is generally consistent with guidance available on Cumberland City Council's website for social impact assessments.

3.1 Potential impacts

The social impacts to arise from the proposal will be influenced by the present state of the baseline environment, the eventual consequences of the proposed development and measures put in place to mitigate against any negative impacts and enhance positive impacts.

Social issues already in existence are relevant only as context, within which the impacts of the proposed development must be examined.

The potential social impacts are identified in Table 1. Impacts are categorised based on the Department of Planning and Environment's *Social Impact Assessment Guideline*.

Table 1: Description of potential social impacts

Impact category	Potential impacts	Potential mitigations and enhancements
Way of life	Reduced acoustic amenity impacts.	<p>The Acoustic Review undertaken by Koikas Acoustics Pty Ltd suggested that the increased noise attenuation requirements for additional development types that would be enabled by the Planning Proposal would likely improve noise impacts for nearby receivers and workers at the site.</p> <p>Any noise generation from building servicing or other future redevelopment of the site would be addressed under the relevant development application process.</p>
	Disruption to daily lives, through noise and vehicular movements affecting nearby residential properties.	The Traffic and Parking Impact Assessment (TPIA) undertaken by ML Traffic Engineers Pty Ltd found that the Planning Proposal would have an acceptably low impact on transport and connectivity in the area, as nearby intersections were shown to have spare capacity and the proposal was not seen to generate significant additional traffic.
Community	Positive impacts to community cohesion through improved access to employment, noting that the study area has a relatively high unemployment rate.	The Planning Proposal would support an increased range of employment-generating uses for a site that has already presented itself as suitable for this purpose.
	Benefit for community development and cohesion through economic activity and potential benefits for neighbouring businesses.	Increased and/or continued economic activity may support the economic performance of business premises in Auburn town centre.
Access	Reduced access to parking on nearby streets.	The TPIA undertaken by ML Traffic Engineers Pty Ltd found that adequate parking was provided within the site, mitigating access impacts for nearby residents and businesses.
	Potential reduction in industrial land.	The Planning Proposal preserves the industrial zoning at the site, ensuring the possibility of future industrial use.

Impact category	Potential impacts	Potential mitigations and enhancements
Culture	Potential negative impact to community and culture through impact to heritage.	There are no known Aboriginal artefacts present, and the site is in a highly modified condition.
		A small part of the site includes a local heritage item (the Clyde Marshalling Yards). This item would not be impacted by the Planning Proposal, and any changes to the built environment at the site would be subject to the relevant heritage approvals required under the DA process.
Health and wellbeing	Improved health and wellbeing through access to employment opportunities in close proximity to residential housing and public transport.	The Planning Proposal would allow for employment opportunities at the site, near public transport and existing residential communities.
	Improved access to healthcare services for residents and workers.	The inclusion of medical centre in permitted uses of the site would help to expand and develop healthcare coverage in the area. New premises would have the benefit of being co-located near existing ones.
	Exposure to unsafe intersection may reduce safety for active transport users.	<p>The TPIA undertaken by ML Traffic Engineers Pty Ltd found that the Planning Proposal could result in increased exposure to the unsafe pedestrian crossing at the western approach to the South Parade and Alice Street intersection.</p> <p>The TPIA recommended that a pedestrian crossing be constructed at this location, which may help to mitigate this potential impact.</p>
Surroundings	Positive impact on surrounding land uses.	The Planning Proposal may support land uses on the site which could serve an ancillary function for the Auburn town centre and other surrounding development.
	Impact on local character.	The Planning Proposal does not include any changes to existing built form, thus comprising an insignificant impact on local character. The land uses espoused by the Planning Proposal are also consistent with those of areas surrounding the site.

Impact category	Potential impacts	Potential mitigations and enhancements
Livelihoods	Positive impacts to livelihoods arising from economic activity.	While the current zoning of the site only allows for new developments that will provide industrial employment, the Planning Proposal would expand the range of economic activities possible, providing a variety of potential future employment sources.
Decision-making systems	Stakeholders may feel unable to influence the development outcomes and may come forward with queries or concerns about potential impacts.	<p>Communication about the Planning Proposal should ensure that local residents, businesses, and any other relevant groups are informed of planning outcomes and are provided with the opportunity to comment on any proposed changes.</p> <p>Any potential negative impacts to decision-making systems are likely to be mitigated by the Planning Proposal seeking to align the planning regime for the site with the existing use, rather than facilitating any significant change.</p>

4.0 CONCLUSION

This SIC has considered the potential social impacts of a Planning Proposal to amend the Cumberland LEP 2021 to include additional permitted land uses at 25 South Parade, Auburn. The findings of this SIC are summarised below:

- The Planning Proposal is likely to have very limited impacts on ways of life in terms of noise and traffic.
- The Planning Proposal is likely to benefit both community cohesion and development, by supporting local access to potential employment and services.
- The Planning Proposal would likely improve access to jobs in the local area.
- The Planning Proposal is unlikely to impact local culture due to any heritage implications. Simultaneously, the site may make a positive cultural contribution to the area, and to Auburn town centre in particular by increasing the range of uses that would be permissible on the site
- The Planning Proposal is likely to have a positive impact in terms of health and wellbeing, helping to expand the potential provision of local health services while supporting convenient employment opportunities for local residents
- The Planning Proposal does not involve any changes to built form; it therefore does not risk impacting local character in this way. At the same time, the site may strengthen its surroundings by providing ancillary services that could benefit wider industrial lands, as well as Auburn town centre and nearby residents
- The Planning Proposal would support a greater range of potential development on the site than what is currently possible, thus presenting a possible benefit for livelihoods in the area.

Overall, the research presented in this document raises no significant concern of potential negative social impact to arise from the planning proposal. The planning proposal may result in positive social outcomes through increased provision of health services and employment opportunities.

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**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 5
Economic Impact Assessment**

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27 July 2023

To whom it may concern

Subject: 25 South Parade, Auburn – Economic Assessment of Planning Proposal

HillPDA was commissioned by South Parade Auburn Trust (Trust) to prepare this assessment. We understand that the Trust is submitting a planning proposal for an amendment to the Cumberland LEP to include additional permitted uses of medical centre and office premises on the subject site. The purpose of this letter is to summarise the findings of our assessment on the economic impacts in the locality of the planning proposal.

In undertaking this assessment we have relied on the following information:

- Architectural drawings of the proposal prepared by RMJ Building Group dated 2 February 2021 for some internal alterations and partitioning in the existing office building
- Minutes of the Pre-lodgement meeting of 23 February 2022 prepared by Cumberland Council
- Notice of determination (approved) of development application dated 16 June 2021
- Assessment report Minute No. 694/00 to Council meeting of 6 September 2000 in relation to the earlier application for construction of the commercial building

The building that was approved, and has since been constructed and occupied, is a two level commercial office building of around 860sqm GFA with around 22 outside car parking spaces.

At the time of lodgement of the original DA in 2000 the land was zoned Special Uses (Railway) under the Auburn Planning Scheme.

The land was also affected by a draft Industrial 4(a) zone under a Draft LEP which would prohibit commercial office development.

Notwithstanding the draft industrial zone, Council's assessment report in 2000 noted some negative aspects to industrial use of the site namely:

The shallow depth of the land is not conducive to industrial development and could result in a proposal for a factory facing onto the street with parking at the western end of the site. Such a proposal would likely have industrial access points in reasonable proximity to the Alice Street traffic lights and road bridge over the railway lines.

Industrial development on the opposite side of the road to future residential flats is not desirable. The proposal for an office development is considered to be more compatible with the nearby residential uses.

The report also noted that the *“site is within easy walking distance to Auburn Railway station and business area. Accordingly, the site is considered to be suitable for office development.”*

The site is on the fringe of the Auburn Town Centre immediately west of the E1 Local Centre zone on the other side of South Parade and around 320m from Auburn Station. The approved and existing use of the site for a medical centre and/or office premises compliments the general strategic principles under the regional and district plans of land use and transport integration – namely promoting higher density employment and living spaces within walking distance of major public transport infrastructure.

In terms of economic impacts in the locality we believe the planning proposal will have no discernible impact. This is because the existing building was designed and constructed as an office building and has been occupied for that purpose. While the site could be redeveloped with a new office building this is a highly unlikely scenario as it would not be feasible to do so at any time in the foreseeable future. Being less than 20 years old and in reasonably good condition the existing building is the ‘highest and best use’ of the site in terms of financial / risk return.

The planning proposal seeks to include a medical centre and office premises as permissible uses on the subject site within the industrial zone. But these uses can already be carried out under existing use rights. Hence there is no economic impact from the base case.

The base case is not redevelopment or change of use to an alternative conforming use such as warehousing, manufacturing, wholesale business or industrial/urban services of some sort. This is because the existing building on the site, which is less than 20 years old, is already the highest and best use of the site. It is simply not financially viable to demolish or convert the building to a conforming use, at great capital expense, which would result in a lower level of net rental income. Office space in that location will pay a higher rent than industrial use and the existing building with existing use rights allows that realisation. At no point in the foreseeable future will it be viable to redevelop the site to some conforming industrial use.

Hence the base case is occupation of the existing building for office premises which could also include a medical centre.

There are various sources of data to estimate jobs on site. City of Sydney Employment and Floor Space Survey 2017 shows an average of 16sqm (GLA) of office space per worker although the density can be higher at 10sqm for open plan offices. Medical centres have a lower employment density of around 23sqm to 30sqm. Given these numbers we would expect around 30 to 40 workers on site. Again this number is expected under both the base case (do nothing) and under the planning proposal (amendment to the LEP).

I trust this addresses the issue satisfactorily. Please contact us if we can be of further assistance.

Yours sincerely,



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**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 6
Heritage Assessment**



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18 July 2023

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HERITAGE IMPACT MEMORANDUM—25 South Parade, Auburn

1 Introduction

Touring the Past has been engaged by the property owner of 25 South Parade, Auburn (subject place) to prepare this Heritage Impact Memorandum. It accompanies a planning proposal to modify the permitted uses under the current zoning overlay. This document provides the consent authority, Cumberland Council, with an expert assessment of the appropriateness of the proposal from a heritage management perspective.

The author of this report is an experienced heritage consultant and accredited professional historian, and the assessment is made pursuant to the Expert Witness Code of Conduct in Schedule 7 of the *Uniform Civil Procedure Rules 2005 (NSW)*. Terminology and principles in this document are informed by good heritage practice, namely as expressed by *The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter (rev. 2013)*.

2 Heritage Management Framework

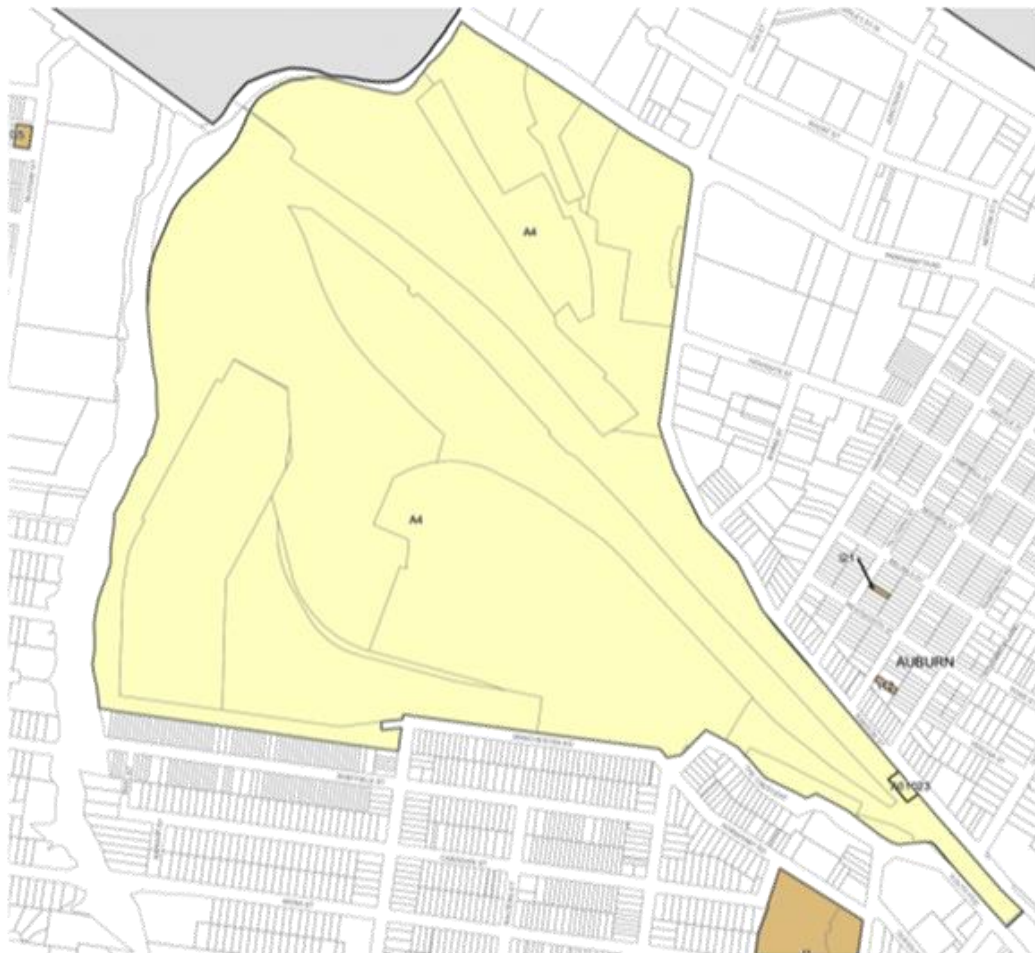
The subject place—Lot 2, DP 806999—comprises an elongated triangular property on the north side of South Parade Road. The Main Suburban railway line abuts the place at the rear.

The place forms a small part of an extensive overlay associated with an archaeological site included in Schedule 5 of the *Cumberland Local Environmental Plan 2021 (CLEP)*. Its listing details follow:

Item name	Address	Property Description	Significance	Item no.
Clyde Marshalling Yards	Rawson	Part Lot 52, DP 1097362; Lots 1–4, DP 1007656; Lot 6, DP 1007656; Lot 2, DP 806999; Part Lot 1, DP 833989; Lot 3, DP 833989; Lot 2, DP 827674; Lots 1 and 2, DP 775808; Lot 201, DP 100768	Local	A4

A Statement of Significance for the *Clyde Marshalling Yards*, extracted from the NSW Heritage Inventory, follows:

The Clyde Marshalling Yard is significant in demonstrating the large volume of railway goods traffic generated by the Sydney metropolitan area, both in historical and current terms. It also demonstrates the close relationship between local industry and rail transport.



Extract from HER_012 with the yellow (Archaeological) shading indicating the extent of the *Clyde Marshalling Yards* listing (A4). The subject place is approximately outlined in red.
(Source: CLEP)

The key objective for heritage management, as per the CLEP (at cl. 5.10), is to sustain a place's assessed cultural heritage value. Accordingly, the Statement of Significance reproduced above and further discussion throughout the document concerning the site provides an essential baseline for understanding the likely impact of the new work on the archaeological asset—an approach in line with Article 27 ('Managing Change') of the *Burra Charter*.

3 Place Summary

The eastern part of the subject place accommodates a two-storey contemporary office building with a hardstand car parking area in the east. Scattered trees and lawn sections characterise the boundaries of the site, which are defined by a tall metal fence. A pair of gabled brick sheds are situated against the northern boundary of the place but form part of the railway line.



Subject place (red arrow), north is top of frame.
(Source: Apple Maps)

The NSW Heritage Inventory provides the following physical description of the *Clyde Marshalling Yards*:

- Complex of railway sidings beside the main suburban lines.
- Site of former marshalling yard offices, marked by concrete slab and tiled floor.
- Pedestrian bridge, steel girder frame with concrete deck.
- Employees platform with shelter. Water tower and stand for watering steam locomotives (at E. End of yards, S. Side of main lines).

None of the above-described elements are present at the subject place. A review of historical aerial photographs from 1930 to 2022 illustrates that the subject place remained undeveloped until the late 1960s when a T-shaped building and hardstand area appeared.¹ This building was heavily modified or replaced in the early 2000s, resulting in the extant large-scale commercial building.

4 Review of Archaeological/Heritage Impact

The proposal is restricted to a planning proposal seeking the additional permitted uses of office premises and medical centre at the place. No physical intervention, including sub-surface disruption, is proposed as part of this planning application.

As the new work would affect an individual archaeological item, the CLEP at cl. 5.10(2) (a)(iii) requires that the consent authority, Cumberland Council, consider the potential impact of the proposal on the significance of the place—as identified by its Statements of Significance—particularly its 'associated fabric, settings and views'.

¹ Aerial photographs reviewed were from Australian Aerial Photograph (Australian Government, Geoscience), Historical Imagery Viewer (NSW Government), and Metromap.



Accepting that the proposed action would not directly equate with any tangible changes at the place, its heritage/archaeological impact is non-existent.

Hypothetically, if the altered zoning led to a proposed physical intervention at the place, then that application would be subject to statutory heritage/archaeological assessment. At that stage, a satisfactory outcome could be managed through established review protocols and appraisal.

In my view, the proposal is supportable from a heritage impact perspective.

Yours faithfully,



PATRICK WILSON

Director—Principal Heritage Consultant

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**DOCUMENTS
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**Attachment 7
Preliminary Site Investigation**



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Preliminary Site Investigation and Assessment Report

Prepared for	Elias Kedhi
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Date of field work	07/07/2022
Project Reference No.	JDRYU152_PSI_V3_25 South Parade, Auburn, NSW_13072023.

13/7/2023



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Document History and Status

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1	Draft	For review	 Jeffrey Yu		14/7/2022
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3	Final	Updated permitted uses	 Jeffrey Yu		13/7/2023

Distribution of Copies

Rev	Format	Issued To
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Abbreviations

ACM	Asbestos Containing Material
AEC	Area of Environmental Concern
AHD	Australian Height Datum
AMP	Asbestos Management Plan
ASC NEPM	National Environment Protection (Assessment of Site Contamination) Measure
ASS	Acid Sulfate Soils
BGS	Below ground surface
BTEX	Benzene, Toluene, Ethylbenzene and Xylenes
COPC	Contaminant of Potential Concern
Council	Cumberland City Council
CSM	Conceptual Site Model
DA	Development Application
DQI	Data Quality Indicator
DQO	Data Quality Objective
DSI	Detailed Site Investigation
EIL	Ecological Investigation Level
ESL	Ecological Screening Level
EP&A	Environmental Planning and Assessment
DRYU	Dr Upsilon Environments Pty Ltd
HIL	Health Investigation Level
HSL	Health Screening Level
IL	Investigation Level
LOR	Limit of Reporting
NATA	National Association of Testing Authorities, Australia
NEPC	National Environment Protection Council
NSW EPA	Environment Protection Authority of New South Wales
NSW OEH	Office of Environment and Heritage of New South Wales
OCP	Organochlorine Pesticide
PAH	Polycyclic Aromatic Hydrocarbons
PCB	Polychlorinated Biphenyl
PPE	Personal Protective Equipment
QA	Quality Assurance



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QC	Quality Control
RAP	Remediation Action Plan
RPD	Relative Percent Difference
SEPP	State Environmental Planning Policy
SWMS	Safe Work Method Statement
TRH	Total Recoverable Hydrocarbon
PFAS	Per- and Polyfluoroalkyl Substances
VENM	Virgin Excavated Natural Material



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Executive Summary

At the request of Elias Kehdi (the "**Client**"), this report presents the findings of a Preliminary Site Investigation and Assessment Report undertaken by Dr Upsilon Environments Pty Ltd ("**DRYU**") for the proposed ongoing landuse - General Industrial setting, seeking for amending Schedule 1 of Cumberland Council LEP 2021 to permit additional permitted uses (APUs) including a medical centre and office premises at 25 South Parade, Auburn, NSW (the "**Site**").

The purpose of the investigation is to provide the client with a sufficient level of data to assess the potential soil contamination on the site and whether further investigation is needed to assist with the planning proposal decision making process. Based on the investigation, the PSI comments on the potential for site contamination and recommendations for additional investigation, remediation action plan, and/or environmental management plan, if necessary.

The report documents the findings of site contamination investigation, including a comprehensive desktop review and site walkover inspection with reference to several relevant reports including:

- A Planning Proposal (Ref. No.: NA, The Planning Hub Pty Ltd, dated May 2022);
- A Planning Certificate (Ref. No.: PC2022/3280, Cumberland Council, dated 06 July 2022)
- A commercial environmental risk report (Ref. No.: LS034239, Lotsearch Pty Ltd, dated 13 July 2022), "**Lotsearch Report**".

The objectives of the preliminary site investigation and assessment are to:

- provide indicative information as to the potential and risk of contamination at the site based on past and current land use activities;
- assess whether the site could be suitable, in the context of land contamination and planning proposal decision making processes, for the identified ongoing land use scenario;
- comment on the potential contamination risks at the site and the need if further investigation is required to find any contamination that could prevent the site suitable for low density residential land use.

In order to assist the Client's planning proposal, DRYU provided the Client with the following environmental consulting services (the "**Services**"):

- Review of planning and regulatory requirements;
- Review of the proposed planning proposal;
- Detailed desktop Review of historical site records, aerial photographs (where available), publicly available data, web-based information searches, and background information relevant to the study area, soil maps, survey data, geology, hydrogeology and topography;
- To conduct a site walkover inspection to to observe site characteristics and check for indicators of actual/potential contamination;
- To prepare a preliminary site contamination investigation and assessment report, presenting the results of the contamination assessment, assessing whether the site could be suitable, in the context of land contamination and planning proposal decision making processes, for the identified ongoing land use scenario;
- To provide recommendations for additional investigation, remediation and/or management.



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Main Findings

- There was no observed bulk storage of dangerous goods or chemicals (such as oils, lubricants, pesticides or similar), underground fuel storage tanks (USTs) or aboveground storage tanks (ASTs).
- NO suspicious materials (including unusual staining, odour, discolouration or inclusions such as building rubble, asbestos sheets/pieces/pipes, ash material, cut/fill activities, stockpile, underground structures that may be associated with subsurface contamination, etc.) were observed onsite, except minor building rubble observed around a container on the western corner.
- NO prominent potential contaminating land uses were sighted in the close proximity
- Evidence of on-site spillage of dangerous goods and /or off-site migration was not observed.
- According to Cumberland Local Environmental Plan 2021, the site is classified as a Class 5 Acid Sulfate Soils land. Since no disturbance, exposure or drainage acid sulfate soils happens onsite to cause environmental damage, DRYU is of the opinion that the environmental risk related with acid sulfate soils on the site for the proposed landuse amendment is unlikely.
- The land does not include or comprise critical habitat.
- The land is not within a heritage conservation area.
- A heritage item is situated on the land.
- In Note 1 – Matters arising under the Contaminated Land Management Act 1997:
- At the date of this certificate, the land (or part of the land) is summarised as follows:
 - Not Significantly contaminated land;
 - Not subject to a management order;
 - Not the subject of an approved voluntary management proposal;
 - Not subject to an ongoing maintenance order;
 - Not the subject of a site audit statement.
- A review of the NSW EPA records indicates that three Contaminated Sites Notified to EPA within the 1 KM databuffer and no Contaminated Land Records of Notice within the suburb of Auburn. The sites are generally not considered to significantly impact the site through off-site migration (if exist),
- Those industries within close proximity of the site with suspicious activities (waste storage, treatment, generation) among nine (9) records of Licensed Activities under the POEO Act 1997, five (5) records of Delicensed Activities still regulated by the EPA and seven (7) Former Licensed Activities under the POEO Act 1997, now revoked or surrendered are not considered to significantly impact or impacted the site. However, none of those suspicious activities was identified onsite.
- NO Waste Management & Liquid Fuel Facilities were identified on-site.
- While there is uncertainty of off-site migration (if exist) from the long history of businesses like Dry Cleaners, Motor Garages & Service Stations in surrounding areas, it is generally not considered to significantly impact the site for the proposed landuse amendment. The review of the Historical Business Directory did not identified any type of Dry Cleaners, Motor Garages & Service Stations on the site in the past several decades.



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Conclusion and Recommendations

Based on the desktop review and site walkover inspection of the site, DRYU is of the opinion that:

- The potential for land contamination to be present at the site as a result of past and present land use activities is low or minimal;
- The environmental risk related with site contamination at the encapsulated site is unlikely or minimal.
-

Therefore, the site is considered to be suitable to be proposed additional permitted uses (a medical centre and office premises).

DRYU recommends that:

- NO further investigations, and management or remediation of land contamination is required for the identified ongoing landuse scenario.
- Should any soil disturbance earthworks, excavation or demolition works in the future, further assessment of site contamination will be required to re-assess the landuse suitability for the site.



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1 Introduction

1.1 General

Dr Upsilon Environments Pty Ltd ("DRYU") was commissioned by Elias Kehdi (the "Client"), to conduct a Preliminary Site Investigation and Assessment for the proposed ongoing landuse - General Industrial setting, seeking for amending Schedule 1 of Cumberland Council (the "Council") LEP 2021 to permit additional permitted uses (APUs) including a medical centre and office premises at 25 South Parade, Auburn, NSW (the "Site").

The objectives of the preliminary site investigation and assessment are to:

- provide indicative information as to the potential and risk of contamination at the site based on past and current land use activities;
- assess whether the site could be suitable, in the context of land contamination and planning proposal decision making processes, for the identified ongoing land use scenario;
- comment on the potential contamination risks at the site and the need if further investigation is required to find any contamination that could prevent the site suitable for low density residential land use.

The report documents the findings of site contamination investigation, including a comprehensive desktop review and site walkover inspection with reference to several relevant reports including:

- A Planning Proposal (Ref. No.: NA, The Planning Hub Pty Ltd, dated May 2022);
- A Planning Certificate (Ref. No.: PC2022/3280, Cumberland Council, dated 06 July 2022)
- A commercial environmental risk report (Ref. No.: LS034239, Lotsearch Pty Ltd, dated 13 July 2022), "**Lotsearch Report**".

1.2 Scope of Work

In order to assist the Client's planning proposal, DRYU provided the Client with the following environmental consulting services (the "Services") (Groundwater assessment was out of the scope of work):

- Review of planning and regulatory requirements;
- Review of the proposed planning proposal;
- Detailed desktop Review of historical site records, aerial photographs (where available), publicly available data, web-based information searches, and background information relevant to the study area, soil maps, survey data, geology, hydrogeology and topography;
- To conduct a site walkover inspection to to observe site characteristics and check for indicators of actual/potential contamination;
- To prepare a preliminary site contamination investigation and assessment report, presenting the results of the contamination assessment, assessing whether the site could be suitable, in the context of land contamination and planning proposal decision making processes, for the identified ongoing land use scenario;
- To provide recommendations for additional investigation, remediation and/or management.



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2 Site Description

2.1 Site Location and Identification

General Site details are included below in Table 1, Figure 1 and Appendix 2 – Site Layout and Sampling Locations.

Table 1 Site Details

Item	Description
Site Address	25 South Parade, Auburn, NSW
Site Identification Details	Lot 2 DP 806999
Zoning	IN1- General Industrial
Approximate Site Area	~1630 m ²
Local Council	Cumberland City Council
Current Land Use:	The Site is currently used as IN1 General Industrial setting with an approved office building and carpark
Future Land Use:	The Site is going to be used as General Industrial setting, seeking for amending Schedule 1 of Cumberland LEP 2021 to permit additional permitted uses (APUs) including a medical centre and office premises.
Surrounding Land Uses:	<ul style="list-style-type: none"> • Medium density residential and commercial properties around southern and western close proximity. • St Joseph's Hospital, St John's Catholic Primary School and Sydney Catholic Early Childhood Service Centre are in the south-eastern close proximity. • LL Cleaning services to the western close proximity within 100 m. • Auburn train station within 350 m in the east. • Duck River and Haslams Creek over 1.2 KM in the west and east, respectively. • Archaeological Item A4 – Clyde Marshalling Yards along the northern boundary.
Site Co-ordinates:	The approximate centre of the site is located at approximately 317730.4 (E), 6253034.8 (N) (GDA 94, MGA Zone 56)

2.2 Site Conditions and Surrounding Environment

Site walkover inspection was carried out by Dr Upsilon Environments Consultant on 07 July 2022.



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Figure 1 The site at 25 South Parade, Auburn, NSW (facing east) on 7 July 2022.

From the Site layout shown in Figure 1, Figure 3 and Appendix 1 – Representative Photographs, site features identified during the site walkover are summarised below:

- The Site is occupied by a two-storey structure with metal sheeting roof and appeared to be recently built and in good condition.
- A hardstand carpark is located at the western section of the site.
- Turf and sporadic trees are sighted around the boundaries.
- Internal renovation and minor landscaping around the building footprint is in progress.
- The Site is accessed through South Parade.
- There was no observed bulk storage of dangerous goods or chemicals (such as oils, lubricants, pesticides or similar), underground fuel storage tanks (USTs) or aboveground storage tanks (ASTs).
- NO suspicious materials (including unusual staining, odour, discolouration or inclusions such as building rubble, asbestos sheets/pieces/pipes, ash material, cut/fill activities, stockpile, underground structures that may be associated with subsurface contamination, etc.) were observed onsite, except minor building rubble observed around a container on the western corner.
- NO prominent potential contaminating land uses were sighted in the close proximity
- Evidence of on-site spillage of dangerous goods and /or off-site migration was not observed.

2.3 Site Topography and Drainage

Reference to the PARRAMATTA RIVER 9130-3N topographic map 1:25000 (accessed through the Spatial Information Exchange <https://six.nsw.gov.au/etopo>) indicates that the Site is situated in a flat plain. The Site slightly slopes toward north-western section. The topographic map indicates that the elevation of the Site is approximately 24 ~ 22 m Australian Height Datum ("AHD").

With reference to the eSPADE from Office of Environment and Heritage NSW (<https://www.environment.nsw.gov.au/eSpade2Webapp#>) dataset information, the site has gently undulating rises on Wianamatta Group shales and Hawkesbury shale. Local relief to 30



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m, slopes are usually <5%. Broad rounded crests and ridges with gently inclined slopes. Cleared eucalypt woodland and tall open-forest (wet sclerophyll forests). Crests and ridges are broad (200–600 m) and rounded with convex upper slopes grading into concave lower slopes. Rock outcrop is absent.

2.4 Regional Geology and Soils

The site geology belongs to Wianamatta Group– Ashfield Shale consisting of laminite and dark grey siltstone and Bringelly Shale which consists of shale, with occasional calcareous claystone, laminite and coal.

Soils – shallow to moderately deep (<100 cm) Red and Brown Podzolic Soils (Dr3.21, Dr3.11, Db2.11) on crests, upper slopes and well-drained areas; deep (150–300 cm) Yellow Podzolic Soils and Soloths (Dy2.11, Dy3.11) on lower slopes and in areas of poor drainage.

2.5 Regional Hydrogeology and Local Groundwater Usage

The site is located at a porous, extensive aquifer with low to moderate productivity (Page Lotsearch Report).

According to the Groundwater Map provided by WaterNSW (<https://realtimedata.watnsw.com.au/>) and Lotsearch Report (Page 46-51), six closest boreholes were identified within 1000-m data buffer, as shown in Table 2. None of bore or monitoring well was identified onsite.

Table 2 Summary of the one closest groundwater wells within 1000 m data-buffer

NGIS Bore ID	NSW Bore ID	Bore Type	Status	Drill Date	Bore Depth (m)	SWL (mbgl)	Distance	Direction
10111133	GW112803	Monitoring	Functional	10/05/2012	6		305m	North West
10053829	GW112804	Monitoring	Functional	10/05/2012	6	1.5	525m	North West
10100249	GW112805	Monitoring	Functional	10/05/2012	6		532m	North West
10038634	GW112801	Monitoring	Functional	10/05/2012	6.5		779m	West
10030806	GW112800	Monitoring	Functional	07/05/2012	6		811m	North West
10099359	GW112802	Monitoring	Functional	09/05/2012	5		846m	North West

Temporary Water Restrictions Order 2018 relating to the Botany Sands Aquifer is not applicable for the site.

2.6 Salinity Potential

According to Salinity Potential of Western Sydney, Department of Infrastructure, Planning and Natural Resources (DIPNR), 2002 (<https://datasets.seed.nsw.gov.au/dataset/salinity-potential-of-western-sydney473ff>) through SEED The Central Resource for Sharing and Enabling Environmental Data in NSW, the site has moderate potential of salinity.

2.7 Acid Sulfate Soils

Acid sulfate soils is the common name given to naturally occurring soils and sediments that contain iron sulfide (pyrite). As sea levels slowly rose (between 6,000 and 10,000 years ago), substantial deposits of pyritic sediments formed in estuarine mud, where tidal seawater (containing sulfur) met and mixed with freshwater outflows (containing iron). Acid sulfate soils are defined as either:



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- **Actual** acid sulfate soils (AASS) - where the soils have already been exposed to oxygen and have a pH < 4, or
- **Potential** acid sulfate soils (PASS) - where the soils have not been exposed but have the potential to generate sulfuric acid if exposed. PASS are naturally occurring soils and sediment that contains iron sulfides (pyrite) which, when exposed to oxygen generate sulfuric acid.

Left undisturbed, acid sulfate soils do not pose any harm. However, if they are disturbed and exposed to oxygen (air) through activities such as excavation or the lowering of the water table, sulfuric acid may be produced in large quantities.

The ASS planning maps provide an indication of the relative potential for disturbance of ASS to occur at locations within the council area. These maps do not provide an indication of the actual occurrence of ASS at a site or the likely severity of the conditions.

The ASS maps are divided into five classes dependent upon the type of activities/works that if undertaken, may represent an environmental risk through the development of acidic conditions associated with ASS:

Table 3 Acid Sulfate Soils Risk Classes

Class 1	All works.
Class 2	All works below existing ground level and works by which the water table is likely to be lowered.
Class 3	Works at depths beyond 1 m below existing ground level or works by which the water table is likely to be lowered beyond 1m below existing ground level.
Class 4	Works at depths beyond 2 m below existing ground level or works by which the water table is likely to be lowered beyond 2 m below existing ground level.
Class 5	Works within 500 m of adjacent Class 1,2,3,4 land which are likely to lower the water table below 1 m AHD on the adjacent land.

Note: ¹Australian Height Datum, and ² 'work' is defined as any works that disturb more than one (1) tonne of soil, or lower the water table.

NSW Planning Industry & Environment resources (<https://www.environment.nsw.gov.au/topics/land-and-soil/soil-degradation/acid-sulfate-soils> and <https://datasets.seed.nsw.gov.au/dataset/acid-sulfate-soils-risk0196c>) and Acid Sulfate Soil ("ASS") Risk Mapping (<https://www.environment.nsw.gov.au/eSpade2Webapp#>) for the site indicate that the Site is classified as NO known occurrence, and the site is over 500 m away from adjacent Class 3, 4 and 2 lands,

According to Cumberland Local Environmental Plan 2021, the site is classified as a Class 5 area, as shown in Figure 2.

Since no disturbance, exposure or drainage acid sulfate soils happens onsite to cause environmental damage, DRYU is of the opinion that the environmental risk related with acid sulfate soils on the site for the proposed landuse amendment is unlikely.



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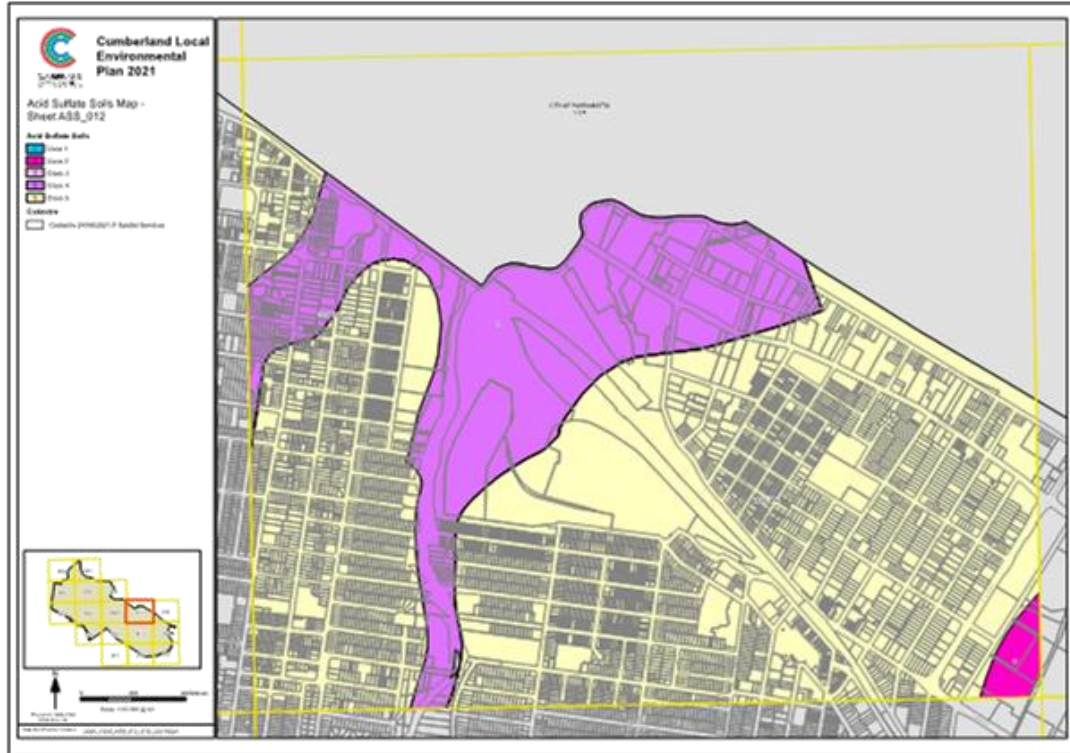


Figure 2 Acid Sulfate Soils ("ASS") Risk Mapping

3 Site and Surrounding Areas History Review

3.1 Information Sources

The desktop review was mainly based on the commercial Environmental Risk Report from Lotsearch ("Lotsearch Report") as well as environmental risk and planning information, public available data sources, including, but not limited to, NSW Environment Protection Authority (EPA) public registers, historical aerial photographs archived by the NSW Land and Property Information (LPI).

The findings of the site history review are provided in the sections below.

3.2 Historical Aerial Photographs Review

Historical aerial photographs were obtained and reviewed through NSW Space Services (Historical Aerial Satellite Imagery, <https://portal.spatial.nsw.gov.au/portal/apps/webappviewer/index.html?id=f7c215b873864d44bccddda8075238cb>) from years 1943, 1955, 1971, 1986, 1991, 1994, 2004, 2005, 2022 as shown in Table 4 and Appendix 3 – Summary of Historical Aerial and High resolution imagery records from 2009 to 2022 were purchased from Nearmap.

Aerial photography indicates the site was mainly a vacant land till 1970s with low density residential dwellings observed in surrounding areas. The train yard in the north-western close proximity could be built before 1943. The major landscape changes happened in around 1971, an industrial building and carpark were identified onsite. There are no apparent landscape changes on site and its surrounding since 1971.



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Table 4 Historical Aerial Photograph Summary

Year	Site Land Use Features	Surrounding Land Use Features
1943	A vacant land	The north boundary of the site is the railway, the west direction is industrial land, and the south direction are full of residential dwellings.
1955	There was no apparent landscape change on the site.	There was no apparent landscape change at surrounding areas. St John's School buildings were constructed at the south-eastern direction.
1971	Significant landscape change has appeared until 1971. Industrial buildings were built on site with large car park spaces.	Residential dwellings were completed especially in the southeast direction.
1986 - 1994	There was no apparent landscape change on the site.	An industrial like structure was built in the north-western close proximity.
2004-2005	The old structure was demolished and a new building was observed at the south-eastern section. Concrete carpark throughout the north-western section.	There was no apparent landscape change in the surrounding areas. A warehouse like structure was demolished and new medium density buildings were constructed in the southern surrounding area.
2005 - 2022	There was no apparent landscape change on the site.	There was no apparent landscape change in the surrounding areas.

3.3 NSW EPA Records Search

A review of the 'Record of notices' listed by the NSW EPA under the Contaminated Land Management Act 1997 (<https://apps.epa.nsw.gov.au/prclmapp/searchregister.aspx>) on 7 July 2022 identified three Contaminated Sites Notified to EPA within the 1 KM databuffer and no Contaminated Land Records of Notice within the suburb of Auburn (Page 5 – 7, Lotsearch Report). The Contaminated Site notified to EPA at 11-13 Percy Street, Auburn under assessment within 927 m in the east is generally not considered to significantly impact the site through off-site migration (if exist), as shown in Table 5.

Table 5 Contaminated Land: Contaminated Sites and Record of Notices Notified to EPA

Site	Address	Suburb	Activity	Management Class	Status	Distance (m)	Direction
Maintrain Facility - Sydney Trains Auburn	Manchester Road	Auburn	Other Industry	Regulation under CLM Act not required	Current EPA List	0	On-site
Janyon	Manchester Road	Auburn	Other Industry	Regulation under CLM Act not required	Current EPA List	504	West
Commercial Premises	11-13 Percy STREET	AUBURN	Other Industry	Under assessment	Current EPA List	927	East

3.4 Regulatory Notice Search Under the POEO and CLM Acts

The Protection of the Environment Operations Act public register, published by NSW Environmental Protection Authority (EPA), contains information regarding:

- Environmental protection licenses;
- Applications for new licenses and to transfer or vary existing licenses;
- Environment protection and noise control licenses;
- Convictions in prosecutions under the POEO Act;
- The result of civil proceedings;
- License review information;
- Exemptions from provisions of the POEO Act or Regulations;
- Approvals granted under Clause 9 of the POEO (Control of Burning) Regulation; and
- Approvals granted under Clause 7a of the POEO (Clean Air Regulation).



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A review of the "POEO Public Register" conducted on 14 July 2022, there are 104 notices for the Sites on the Protection of the Environment Operations Act 1997 public register. Those sites with suspicious activities (waste storage, treatment, generation) among nine (9) records of Licensed Activities under the POEO Act 1997, five (5) records of Delicensed Activities still regulated by the EPA and seven (7) Former Licensed Activities under the POEO Act 1997, now revoked or surrendered were summarised in Table (Page 13 – 17, Lotsearch report). The closest sites at St Joseph's Hospital and former licensed chemical storage activity at Manildra Starches are not considered to significantly impact or impacted the site.

However, none of those suspicious activities was identified onsite.

Table 6 Summary of Licensed, Delicensed or Former Licensed Activities with suspicious or potential contamination activity

Type	Organisation	Name	Address	Suburb	Activity	Distance (m)	Direction
Licensed	VEOLIA ENVIRONMENTAL SERVICES (AUSTRALIA) PTY LTD	CLYDE TRANSFER TERMINAL	PARRAMATTA ROAD	CLYDE	Non-thermal treatment of general waste	697	North West
Licensed	VEOLIA ENVIRONMENTAL SERVICES (AUSTRALIA) PTY LTD	CLYDE TRANSFER TERMINAL	PARRAMATTA ROAD	CLYDE	Waste storage - other types of waste	697	North West
Licensed	LION-BEER, SPIRITS & WINE PTY LTD	TOOHEYS PTY LTD	29 NYRANG STREET	LIDCOMBE	Waste storage - hazardous, restricted solid, liquid, clinical and related waste and asbestos waste	998	East
Delicensed	ST. JOSEPH'S HOSPITAL LIMITED	ST. JOSEPH'S HOSPITAL	NORMANBY ROAD	AUBURN	Hazardous, Industrial or Group A Waste Generation or Storage	124	South West
Delicensed	UGL RAIL SERVICES PTY LIMITED	MAINTRAIN SERVICE CENTRE	MANCHESTER ROAD	AUBURN	Hazardous, Industrial or Group A Waste Generation or Storage	231	North West
Delicensed	GILBARCO AUSTRALIA LIMITED		20 Highgate Street	AUBURN	Hazardous, Industrial or Group A Waste Generation or Storage	696	North
Delicensed	VIP PLASTIC PACKAGING PTY LTD	VISY INDUSTRIAL PACKAGING	11-13 PERCY ST	AUBURN	Hazardous, Industrial or Group A Waste Generation or Storage	927	East



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Delicensed	SMORGON STEEL DISTRIBUTION PTY LTD	SMORGON STEEL METALS DISTRIBUTION	MANCHESTER ROAD WEST	AUBURN	Hazardous, Industrial or Group A Waste Generation or Storage	983	West
Former Licensed	MANILDRA STARCHES PTY LTD	THE CRSCENT, AUBURN, NSW 2144	Surrendered	27/12/2000	General chemicals storage	1	North West
Former Licensed	PACIFIC NATIONAL (NSW) PTY LTD	322 PARRAMATT A ROAD, CLYDE, NSW 2142	Surrendered	02/05/2000	Waste Storage, Transfer, Separating or Processing	697	North West
Former Licensed	SILTECH INTERNATIONAL PTY LTD	58 Percy Street, AUBURN, NSW 2144	Surrendered	13/05/2002	Hazardous, Industrial or Group A Waste Generation or Storage; Non-thermal treatment of hazardous and other waste	857	East

3.5 Waste Management & Liquid Fuel Facilities

Three records of Waste Management & Liquid Fuel Facilities were identified within the 1000-m data buffer (Page 8 – 9, Lotsearch Report).

NO Waste Management & Liquid Fuel Facilities were identified on-site.

3.6 PFAS Investigation and Management Programs

NO PFAS Investigation and Manage Programs were identified within the 5 KM data buffer, based on the EPA online search (<https://www.epa.nsw.gov.au/your-environment/contaminated-land/pfas-investigation-program>).

3.7 Section 10.7 (2) and (5) Planning Certificate Search

The Planning Certificate 10.7(2) and (5) includes that:

The following environmental planning instruments apply to the carrying out of development on the land:

- Cumberland Local Environmental Plan 2021
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Exempt and Complying Development Codes) 2008
- State Environmental Planning Policy (Housing) 2021
- State Environmental Planning Policy (Industry and Employment) 2021
- State Environmental Planning Policy (Planning Systems) 2021
- State Environmental Planning Policy (Primary Production) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Resource and Energy) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- State Environmental Planning Policy No. 65 - Design Quality of Residential Flat Development
- State Environmental Planning Policy - Building Sustainability Index: BASIX 2004
- Cumberland Development Control Plan 2021
- Standard Instrument (Local Environmental Plans) Order 2006



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The land does not include or comprise critical habitat.
The land is not within a heritage conservation area.
A heritage item is situated on the land.

In Item 7 – Council and other public authority policies on hazard risk restrictions:
The land is affected by a policy adopted by the Council that restricts the development of the land because of the likelihood of acid sulphate soils. Development consent is required for certain works on this land. However, for the proposed amendment of additional use in this report, environmental damage is unlikely.

In Note 1 – Matters arising under the Contaminated Land Management Act 1997:
At the date of this certificate, the land (or part of the land) is summarised as follows:
Not Significantly contaminated land;
Not subject to a management order;
Not the subject of an approved voluntary management proposal;
Not subject to an ongoing maintenance order;
Not the subject of a site audit statement.

3.8 Council Record Search Available under the GIPA Act 2010

A search of the council records made available under the GIPA Act through DA tracking was conducted. NO development approval(s) that have the potential as a source of contamination was identified onsite.

3.9 Historical Business Directories Review

Universal Business Directory records from years 1991, 1986, 1982, 1978, 1975, 1970, 1965, 1961 & 1950, mapped to a premise or road intersection within the 150-m dataset buffer. Mapped to a road or an area, within the dataset buffer. Records are mapped to the road when a building number is not supplied, cannot be found, or the road has been renumbered since the directory was published (Page 18 – 26, Lotsearch Report).

Dry Cleaners, Motor Garages & Service Stations 1948-1993 Premise or Road Intersection Matches. Dry Cleaners, Motor Garages & Service Stations from UBD Business Directories, mapped to a road or an area, within the 500-m dataset buffer. Records are mapped to the road when a building number is not supplied, cannot be found, or the road has been renumbered since the directory was published (Page 27 – 35, Lotsearch Report). As the potential point sources of contamination (motor garages & engineers, dry cleaners, service stations), 13 to 20 sites were identified within the 500-m databuffer, such as Motor garage at 13 Alice Street, Auburn within 76 m in the south-western direction (1956 - 1982).

While there is uncertainty of off-site migration (if exist) from the long history of those types of businesses, it is generally not considered to significantly impact the site for the proposed landuse amendment. Especially, most of the site is encapsulated with concrete either as slab or pavement.

The review of the Historical Business Directory did not identified any type of Dry Cleaners, Motor Garages & Service Stations on the site in the past several decades.

3.10 Summary of Site History Review

Based on the desk study review, the Site history is summarised below:



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- Aerial photography indicates the site was mainly a vacant land till 1970s with low density residential dwellings observed in surrounding areas. The train yard in the north-western close proximity could be built before 1943. The major landscape changes happened in around 1971, an industrial building and carpark were identified onsite. There are no apparent landscape changes on site and its surrounding since 1994. The old structure was demolished in around 2000. A new building at the south-eastern section and a new concrete carpark throughout at the north-western section were constructed.
- A review of the NSW EPA records indicates that three Contaminated Sites Notified to EPA within the 1 KM databuffer and no Contaminated Land Records of Notice within the suburb of Auburn. The sites are generally not considered to significantly impact the site through off-site migration (if exist),
- A review of the "POEO Public Register" conducted on 14 July 2022, there are 104 notices for the Sites on the Protection of the Environment Operations Act 1997 public register. Those sites with suspicious activities (waste storage, treatment, generation) among nine (9) records of Licensed Activities under the POEO Act 1997, five (5) records of Delicensed Activities still regulated by the EPA and seven (7) Former Licensed Activities under the POEO Act 1997, now revoked or surrendered are not considered to significantly impact or impacted the site. However, none of those suspicious activities was identified onsite.
- NO Waste Management & Liquid Fuel Facilities were identified on-site.
- A review of Universal Business Directory records from years 1991, 1986, 1982, 1978, 1975, 1970, 1965, 1961 & 1950 and Dry Cleaners, Motor Garages & Service Stations 1948-1993 Premise or Road Intersection Matches identified dozens of potential point sources within the 500-m databuffer around the site. While there is uncertainty of off-site migration (if exist) from the long history of those types of businesses, it is generally not considered to significantly impact the site for the proposed landuse amendment. The review of the Historical Business Directory did not identified any type of Dry Cleaners, Motor Garages & Service Stations on the site in the past several decades.

3.11 Gaps in the Site History

The Site history review revealed the following gaps in the Site history:

- Minor building rubble were observed in surface soils at the western corner of the carpark, while areas, including pavements, under slabs and structure footprints, were not accessible at the time of inspection and investigation.

3.12 Integrity Assessment

Where available this comprehensive site history assessment has utilised formal sources of information issued by NSW EPA, and NSW Land & Property Information. These formal sources are supplemented by information provided by the client, landowner, and observations made by DRYU professionals during site inspections. Review of the site history summary demonstrates a consistent timeline of landuse activities and layout without significant data gaps/consistencies to trigger further historical investigations. Hence, the sources and content of this assessment maybe should be considered to provide a reliable and satisfactory level of accuracy to support this site history assessment and the identification of potential sources of environmental contamination.

4 Preliminary Conceptual Site Model

Based on the Site history review and Site walkover, a preliminary CSM has been prepared to outline the frame work for identifying how the site may have become contaminated and how



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potential receptors may be exposed to contamination either in the present or the future through an assessment of the potential source – pathway – receptor linkage (complete pathway).

The key elements of the preliminary CSM as outlined in NEMP 2013 include:

- Known and potential sources of contamination
- Potential contaminants of concern
- Mechanism of contamination
- Potentially affected media
- Human and ecological receptors
- Potential for migration
- Exposure pathways

4.1 Areas of Concern and Chemicals of Environmental Concern

Based on the desktop review and site walkover of the site (potential contamination - landfill), the following potential sources of contamination and associated contaminants of potential concern (COPC) have been identified.

- Uncontrolled Filling: A potential source of contamination is imported contaminated fill or residual demolition waste. It is possible that hazardous building materials such as asbestos and lead paint being a potential issue in surface soils and fill. Various COPC can be associated with filling, such as heavy metals, asbestos, polycyclic aromatic hydrocarbons (PAH), petroleum hydrocarbons, organochlorine pesticides (OCP), polychlorinated biphenyls (PCB), and asbestos. Potential contaminants associated with hazardous building materials include lead, asbestos and PCB;
- Existing Buildings on site: COPC include hazardous building materials such as asbestos, lead based paints, PCB in capacitors and/or synthetic mineral fibres (SMF); and
- Adjacent Users including past adjacent uses: high risk activities including offsite migration from adjacent landfill if the racecourse was backfilled or from the upgradient petrol station. Such activities can lead to the contamination of soils and groundwater with contaminants that are volatile and present a potential vapour intrusion risk. Potential related contaminants including heavy metals, TRH, BTEX and PAH.

The main potential receptors of contamination at the site (current and future) are considered to be:

- Site users (residents, visitors);
- Construction works (for the construction of any future development);
- Maintenance workers;
- Adjacent site users;
- Surface water;
- Groundwater;
- Terrestrial and aquatic ecology.

The potential contamination pathways through which the identified receptors could come into contact with contamination are considered to be:

- Ingestion and dermal contact;
- Inhalation of dust;
- Inhalation of landfill and/or volatile vapours;
- Surface water run off;
- Leaching and vertical migration into groundwater;



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- Lateral migration of groundwater;
- Contact with terrestrial and aquatic ecology.

4.2 Potential Sources, Pathways and Receptors of Contamination

The potential sources, pathways and receptors of contamination are provided below in Table 7.

Table 7 Potential Sources, Pathways and Receptors of Contamination

Potential Sources	Pathway	Receptor	Comment/Risk Management/Action Recommended
Importation of potentially contaminated fill onsite	Ingestion and dermal contact	Current and future Site users	There is no potential for Site users to come into contact with contaminated soil if exist, therefore a complete pathway potentially does exist.
	Inhalation of dust and vapours	Current and future Site users and surrounding Site users	There is no potential for Site users and surrounding land users to be exposed to dust and vapours from the Site, therefore a complete pathway is not considered to exist.
	Leaching of contaminants into ground surface	Soils across the Site	The potential for surface and shallow soils to be contaminated as a result of historical Site activities is not certain, under concrete encapsulation a complete pathway does not exist and to be addressed with limited intrusive investigation
	Leaching of contaminants into groundwater	Groundwater beneath the Site	Given the historical and current Site use, surrounding land uses, groundwater is anticipated to be at depths greater than 2 m BGL, and groundwater beneath the Site is potentially anticipated to be not contaminated as a result of Site activities. Therefore, a potentially complete pathway is less likely considered to exist.
	Surface water runoff	Terrestrial and aquatic ecology	There is no potential for stormwater runoff from the Site to be impacted from surface soil contamination, which can then impact off-site surface water receptors through stormwater system flow, therefore a complete pathway does not exist.
Potentially hazardous building materials on ground surface and buried below ground surface	Ingestion and dermal contact	Current and future Site users	There is no potential for Site users to come into contact with contaminated soil if exist, therefore a complete pathway is not considered to exist.
	Inhalation of dust and vapours	Current and future Site users and surrounding Site users	There is no potential for Site users and surrounding land users to be exposed to dust and vapours from the Site, therefore a complete pathway does not exist.



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Potential Sources	Pathway	Receptor	Comment/Risk Management/Action Recommended
Potentially contaminants offsite migration	Ingestion and dermal contact	Current and future Site users	There is less likely for Site users to come into contact with contaminated soil, therefore a complete pathway does not exist.
	Inhalation of dust and vapours	Current and future Site users and surrounding Site users	There is less likely for Site users to be exposed to dust and vapours from the Site, therefore a complete pathway is not considered to exist.
	Leaching of contaminants into ground surface	Soils across the Site	There is unlikely that leachate from the surroundings to impact the site surface soils as groundwater water level is anticipated to be greater than 2 m BGL, therefore a complete pathway is not considered to exist.
	Leaching of contaminants into groundwater	Groundwater beneath the Site	The groundwater level is anticipated to be ~2 m BGL. Therefore, a complete pathway is not considered to exert a significant impact on the site.

5 Findings, Results and Discussion

DRYU site layout, areas of environmental concern and suspected areas of environmental concern are summarised in Figure 3. Based on site walkover inspection and desktop review mainly find that:

- There was no observed bulk storage of dangerous goods or chemicals (such as oils, lubricants, pesticides or similar), underground fuel storage tanks (USTs) or aboveground storage tanks (ASTs).
- NO suspicious materials (including unusual staining, odour, discolouration or inclusions such as building rubble, asbestos sheets/pieces/pipes, ash material, cut/fill activities, stockpile, underground structures that may be associated with subsurface contamination, etc.) were observed onsite, except minor building rubble observed around a container on the western corner.
- NO prominent potential contaminating land uses were sighted in the close proximity
- Evidence of on-site spillage of dangerous goods and /or off-site migration was not observed.
- According to Cumberland Local Environmental Plan 2021, the site is classified as a Class 5 Acid Sulfate Soils land. Since no disturbance, exposure or drainage acid sulfate soils happens onsite to cause environmental damage, DRYU is of the opinion that the environmental risk related with acid sulfate soils on the site for the proposed landuse amendment is unlikely.
- The land does not include or comprise critical habitat.
- The land is not within a heritage conservation area.
- A heritage item is situated on the land.
- In Note 1 – Matters arising under the Contaminated Land Management Act 1997:
- At the date of this certificate, the land (or part of the land) is summarised as follows:
 - Not Significantly contaminated land;
 - Not subject to a management order;
 - Not the subject of an approved voluntary management proposal;



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- Not subject to an ongoing maintenance order;
- Not the subject of a site audit statement.
- A review of the NSW EPA records indicates that three Contaminated Sites Notified to EPA within the 1 KM databuffer and no Contaminated Land Records of Notice within the suburb of Auburn. The sites are generally not considered to significantly impact the site through off-site migration (if exist),
- Those industries within close proximity of the site with suspicious activities (waste storage, treatment, generation) among nine (9) records of Licensed Activities under the POEO Act 1997, five (5) records of Delicensed Activities still regulated by the EPA and seven (7) Former Licensed Activities under the POEO Act 1997, now revoked or surrendered are not considered to significantly impact or impacted the site. However, none of those suspicious activities was identified onsite.
- NO Waste Management & Liquid Fuel Facilities were identified on-site.
- While there is uncertainty of off-site migration (if exist) from the long history of businesses like Dry Cleaners, Motor Garages & Service Stations in surrounding areas, it is generally not considered to significantly impact the site for the proposed landuse amendment. The review of the Historical Business Directory did not identified any type of Dry Cleaners, Motor Garages & Service Stations on the site in the past several decades.

6 Conclusions and Recommendations

Based on the desktop review and site walkover inspection of the site, DRYU is of the opinion that:

- The potential for land contamination to be present at the site as a result of past and present land use activities is low or minimal;
- The environmental risk related with site contamination at the encapsulated site is unlikely or minimal.

Therefore, the site is considered to be suitable to be proposed additional permitted uses (a medical centre and office premises) for the planning proposal decision-making process.

DRYU recommends that:

- NO further investigations, and management or remediation of land contamination is required for the identified ongoing landuse scenario.
- Should any soil disturbance earthworks, excavation or demolition works in the future, further assessment of site contamination will be required to re-assess the landuse suitability for the site.

This report is based on a site walkover inspection and site history information review. Recommendations of the report should be implemented to address this data gap. Should unexpected finds such as asbestos containing materials or any other contaminating features such as buried waste, staining or odours be encountered during disposal, relocation and/or placement of the material, further assessment will be required to re-assess the suitability for off-site disposal or on-site reuse based on further waste classification reports.



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7 References

- National Environment Protection Council. (2013). National Environment Protection (Assessment of Site Contamination) Measure, 1999.
- New South Wales Environment Protection Authority. (1995). Contaminated Sites: Sampling Design Guidelines. Chatswood, NSW.
- NSW EPA (2020). Contaminated Land Guidelines Consultants Reporting on Contaminated Land, 2020.
- New South Wales Environment Protection Authority. (2014). Waste Classification Guidelines - Part 1: Classifying Waste. Sydney, Australia.
- New South Wales Environment Protection Authority. (2017). Contaminated Land – Record of Notices. Retrieved from <http://www.epa.nsw.gov.au/prclmapp/aboutregister.aspx>
- New South Wales Environment Protection Authority. (2017). List of NSW contaminated sites notified to EPA. Retrieved from <http://www.epa.nsw.gov.au/clm/publiclist.htm>
- Protection of the Environment Operations Act 1997 (Cth.) (Austl.).
- Protection of the Environment Operations (Waste) Regulation 2014 (Cth.) (Austl.).
- Acid Sulfate Soils Manual, Acid Sulfate Soils Management Advisory Committee (ASSMAC), 1998 (ASS Manual)
- National Acid Sulfate Soils Guidance: National Acid Sulfate Soils Identification and Laboratory Methods Manual, 2018
- Guidelines for the Use of Acid Sulfate Soil Risk Maps, Acid Sulfate Soils Management Advisory Committee (ASSMAC), 1998



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8 Limitations

This report has been prepared for the exclusive use of the client. Dr Upsilon Environments has used a degree of care and skill ordinarily exercised in similar investigations by reputable members of the environmental industry in Australia. No other warranty, expressed or implied, is made or intended. No one section or part of a section, of this report should be taken as giving an overall idea of this report. Each section must be read in conjunction with the whole of this report, including its appendices and attachments.

Any other party should satisfy themselves that the scope of work conducted, and report herein meets their specific needs. Dr Upsilon Environments cannot be held liable for third party reliance on this document, as Dr Upsilon Environments is not aware of the specific needs of the third party.

The subsurface environment can present substantial uncertainty due to its complex heterogeneity. The conclusions presented in this report are based on limited investigation of conditions at specific sampling locations chosen to be as representative as possible under the given circumstances. However, it is possible that this investigation may not have encountered all areas of contamination at the site due to the limited sampling and testing program undertaken.

The material subject to classification pertains only to the Site and subject stockpile outlined within the report and must be consistent with the soil description reported. If there are any unexpected finds that are not consistent with this classification, Dr Upsilon Environments must be notified immediately.

DRYU professional opinions are based upon its professional judgement, experience, training and results from analytical data. In some cases, further testing and analysis may be required, thus producing different results and / or opinions. DRYU has limited its investigation to the scope agreed upon with its client.

Investigations are based on inspections conducted in accordance with industry guidelines and standards, and common industry practice, having regard to the client instructions, and interpretations of conditions are based on the data from those inspections and, where relevant and conducted, testing. They will represent to the best of our knowledge, a reasonable interpretation of the condition of the site as able to be inspected. However, there can be no guarantee that conditions at specific points not able to be inspected do not vary from the interpreted conditions based on the available observations/data.

In practice, it is generally impossible to locate all asbestos in the course of an inspection due to factors including but not limited to access restrictions to certain areas including subsoil, the need to avoid damage, minimising inconvenience, operating plant, unavailability of specific information regarding the premises. The presence of asbestos and asbestos containing materials (ACM) is determined visually while the consultant will collect samples of suspected ACM and have them analysed in a laboratory. Any restrictions on the amount of sampling will reduce confidence in the inspection findings. The ACM that cannot be seen will not be found.

No warranty, undertaking, or guarantee, whether expressed or implied, will be made with respect to the data reported or to the findings, observations, conclusions and recommendations expressed in DRYU report. Furthermore, such data, findings, observations,



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conclusions and recommendations are based solely upon existence at the time of the investigation. The passage of time, manifestation of latent conditions or impacts of future events (e.g. changes in legislation, scientific knowledge, land uses, climatic conditions, etc) may require further investigation at the site with subsequent data analysis and re-evaluation of the findings, observations, conclusions and recommendations expressed in DRYU report.

DRYU report will be prepared on behalf of and for the exclusive use of the Client and is subject to and issued in connection with the provisions of the agreement between DRYU and the Client. DRYU accepts no liability or responsibility whatsoever and expressly disclaims any responsibility for or in respect of any use of or reliance upon DRYU report by any third party or parties. It is the responsibility of the Client to accept if the Client so chooses any recommendations contained within and implement them in an appropriate, suitable and timely manner.

All works undertaken by DRYU are subject to DRYU Terms and conditions for professional services and the statement of limitation.



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9 Appendices



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Appendix 1 – Representative Photographs



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Item 1	
Image	 <p>Network: 7 Jul 2022 at 2:30:01 pm AEST -33.847135, +151.029806 351° W 25 South Parade Auburn NSW 2144 Australia</p>
Location	Hardstand carpark, facing west
Result	Encapsulated, concrete throughout

Item 2	
Image	 <p>Network: 7 Jul 2022 at 2:33:15 pm AEST -33.847220, +151.029481 137° 0E 178-184 South Parade Auburn NSW 2144 Australia</p>
Location	Hardstand carpark, facing east
Result	Encapsulated, concrete throughout



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Item 3	
Image	
Location	Eastern corner
Result	Grass area. Vegetation stress was not observed.

Item 4	
Image	
Location	Southern footprint, landscaping in progress
Result	NO suspicious materials observed on exposed soil surfaces. Turf will be used for landscaping



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Appendix 2 – Site Layout and Sampling Locations



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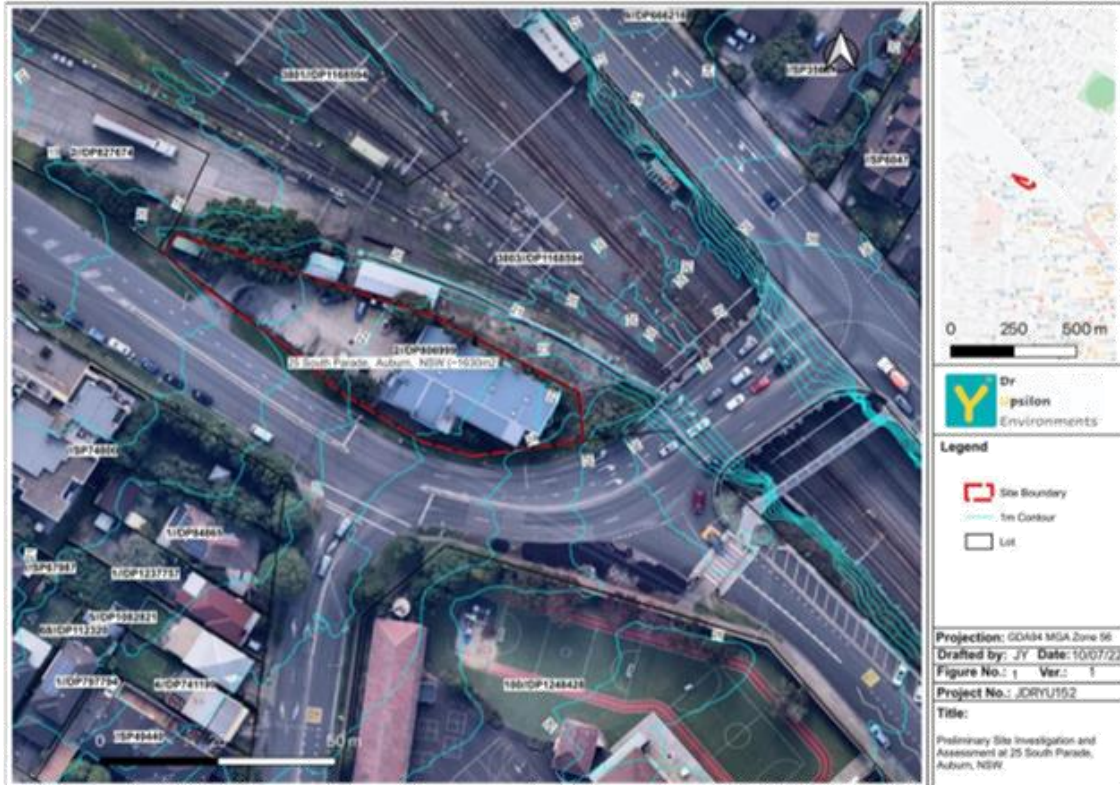


Figure 3 Site layout at 25 South Parade, Auburn, NSW



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Appendix 3 – Summary of Historical Aerial Images



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Appendix 4 – Lotsearch Report



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Appendix 5 – Planning Certificate



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Appendix 6 – Architectural Plan and Survey Plan



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**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 8
Acoustic Letter**

koikas acoustics PTY LTD

CONSULTANTS IN NOISE & VIBRATION

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637-645 Forest Road office@koikasacoustics.com
Bexley NSW 2207 www.koikasacoustics.com ABN: 12 058 524 771

File Reference: 5381L20220414mj25SouthParadeAuburn_PP_v2.docx
Date: Friday, 4th August 2023
Prepared for: South Parade Auburn P/L
Attention: Elias Kehdi – auburn.bookkeeping@gmail.com
Attention: The Planning Hub
Attention: Lachlan Rodgers – lachlan@theplanninghub.com.au

PLANNING PROPOSAL ACOUSTIC REVIEW

25 SOUTH PARADE, AUBURN

Koikas Acoustics Pty Ltd has been advised of a Planning Proposal to be submitted to Cumberland City Council seeking to facilitate the additional permitted use of the site at 25 South Parade, Auburn to allow a medical centre and/or general office premises.

The site is currently zoned E4 General Industrial under the Cumberland Local Environmental Plan (LEP) 2021 which prohibits commercial use. Accordingly, Koikas Acoustics has been requested to provide comments on any potential acoustic issues that may arise from the Planning Proposal.

The following comments summarise our reasoning as to why, purely from an acoustical perspective, the Planning Proposal would be considered acceptable:

1. A commercial building of this nature has substantially less potential for noise breakout compared to an industrial facility. Noise sources associated with medical centres and offices are typically well contained within the building's external envelope.

Furthermore, the majority of commercial premises are generally low-noise environments.

The only external noise-generating source will be the mechanical plant and equipment required to service the building. Considering the site's proximity to a major rail corridor and busy roads, ambient background noise levels are expected to be relatively high during the daytime (*when the medical centre or office operations are generally conducted*), and therefore the impact from any mechanical plant and equipment is expected to be negligible. This may need to be confirmed by a detailed acoustical report during a detailed design phase.

Comparatively speaking, industrial premises will typically offer several means for noise breakout such as from noisy works occurring in outdoor areas with semi-open workspaces, as well as from the mechanical plant and equipment required to service the building. Therefore, a building offering a medical centre or general office premises would typically have a much lower acoustical impact on surrounding residents.

2. Commercial premises will typically have more limited hours of operation and the building would rarely be used during early morning or nighttime hours. This eliminates a major source of potential noise complaints, early-morning or nighttime noise generation, that is often associated with industrial premises.
3. The subject site is located on a major railway corridor and main road. Due to the more stringent internal noise criteria associated with external noise intrusion for commercial spaces as opposed to industrial, the site may require additional noise attenuation measures. This will be pending an additional noise intrusion assessment if deemed by Council to be necessary.

For the above reasons, we believe that the Planning Proposal does not present an issue from an acoustical perspective and is likely to improve acoustic amenity for neighbouring land uses.

The only foreseeable source of potential noise generation would be from the mechanical plant and equipment required to service the building, of which we would expect a suitable condition of consent to accompany any forthcoming Development Application (DA) for the use of the premises as a medical centre/general office premise.

We trust that the above information is satisfactory. Any questions or clarifications may be directed to the undersigned.

Kind regards,

Nick Koikas M.A.A.S.



Principal Consultant

Koikas Acoustics Pty Ltd

Mason Jenkins M.A.A.S

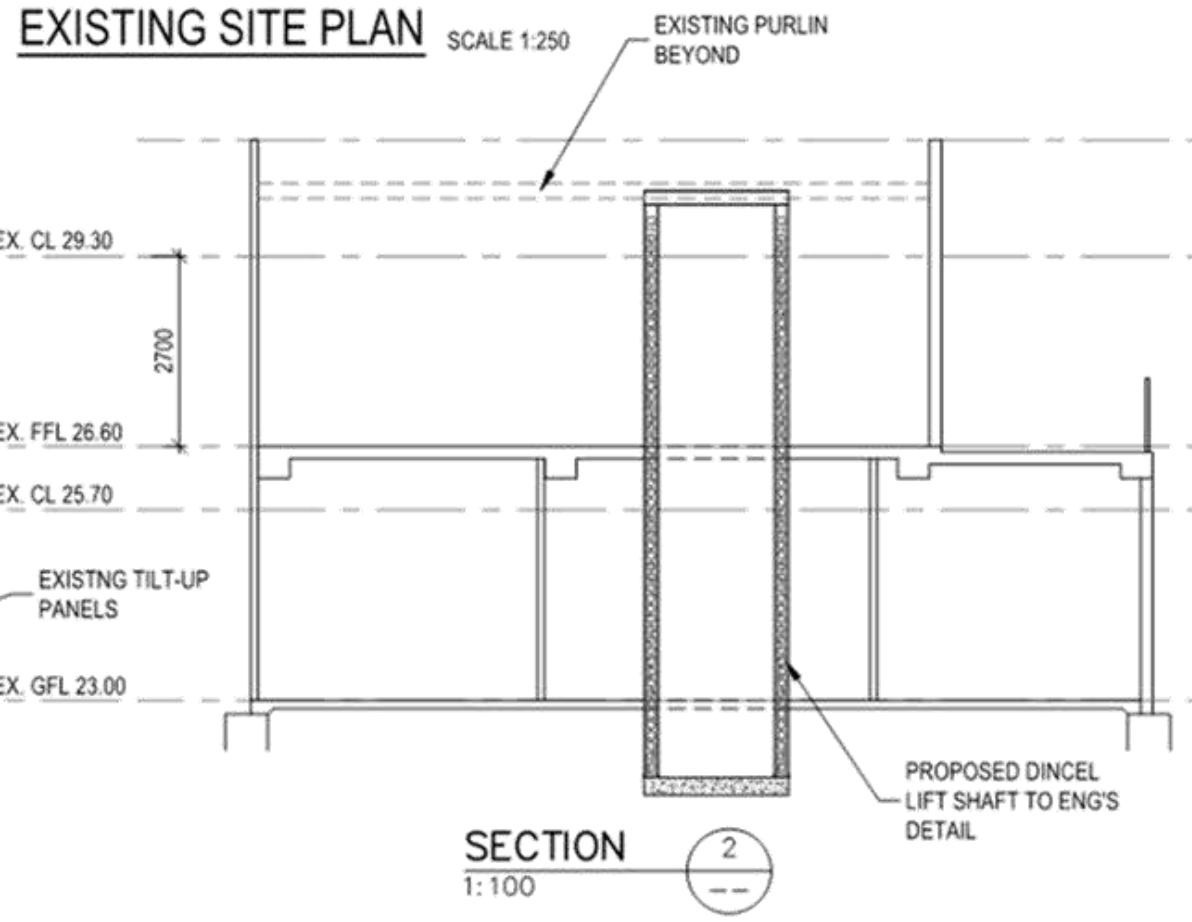
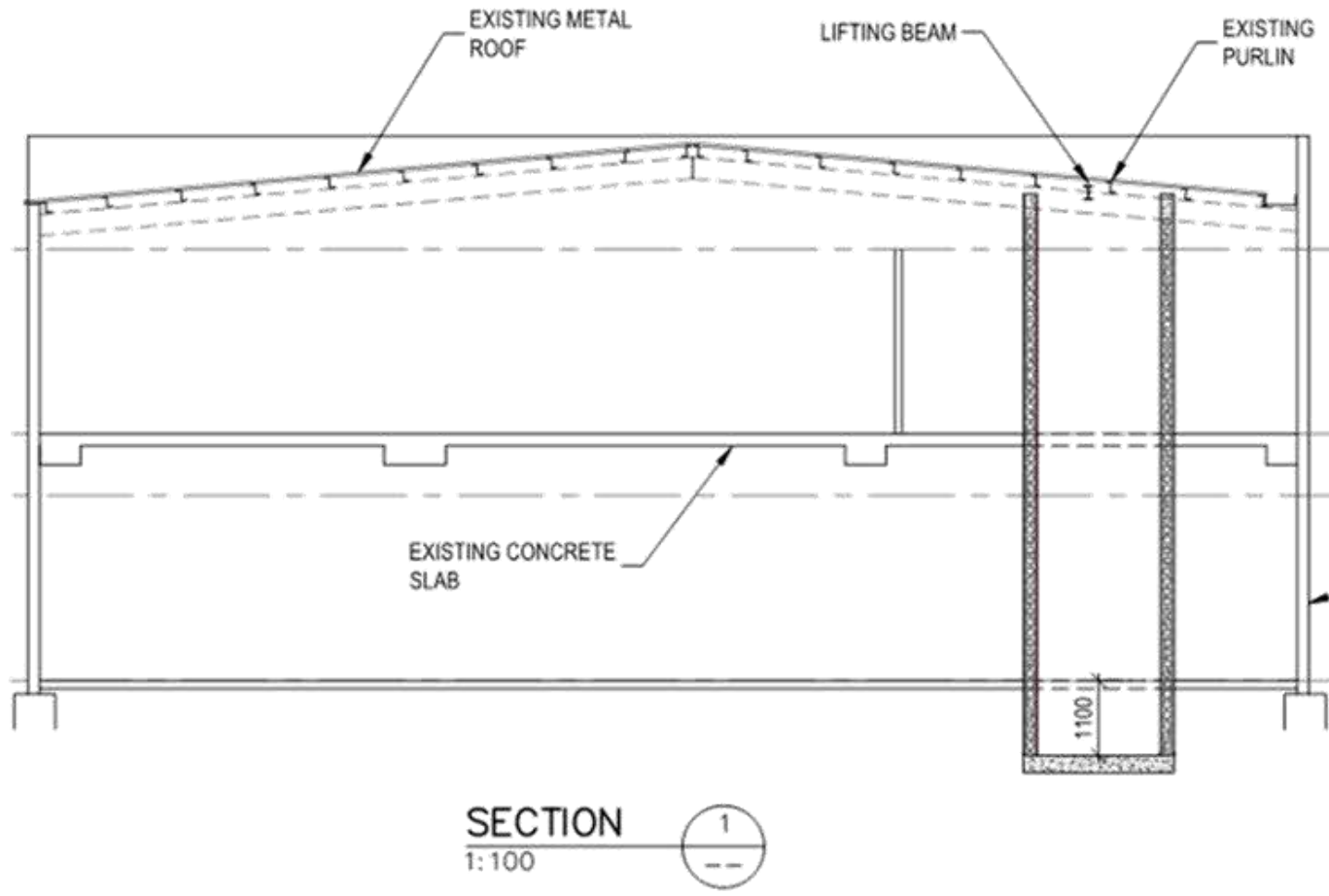
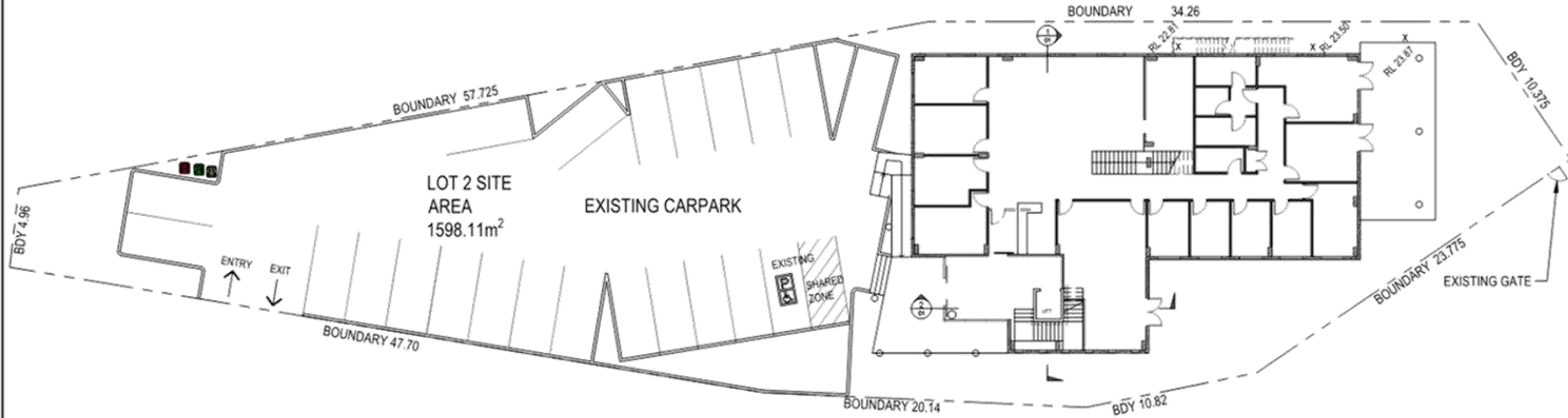


Acoustical Consultant

Koikas Acoustics Pty Ltd

**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 9
Existing Site Plans**



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 Lic No: 319562C
 38 Hunter Street,
 Condell Park NSW 2200
 m. 0426 808 808
 www.rmjbuildinggroup.com.au

Rev:	Date:	Notes:	BY:
01	02-02-2021	ISSUE FOR DA SUBMISSION	R.K.
02	18-05-2021	FIRE EXIT ADDED	R.K.
03	06-10-2021	ISSUE FOR CONSTRUCTION CERTIFICATE	R.K.
04	02-03-2022	ISSUED FOR SECTION 4.55	R.K.

DEVELOPMENT APPLICATION

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Job Address:
 25 SOUTH POE AUBURN
 LOT 2
 DP 806999

Project:
 PROPOSED NEW LIFT & STAIRS

Drawing Title:
 EXISTING SITE PLAN

Client:
 DR E. KEHDI

Consultant:

Date:
 02/02/2021

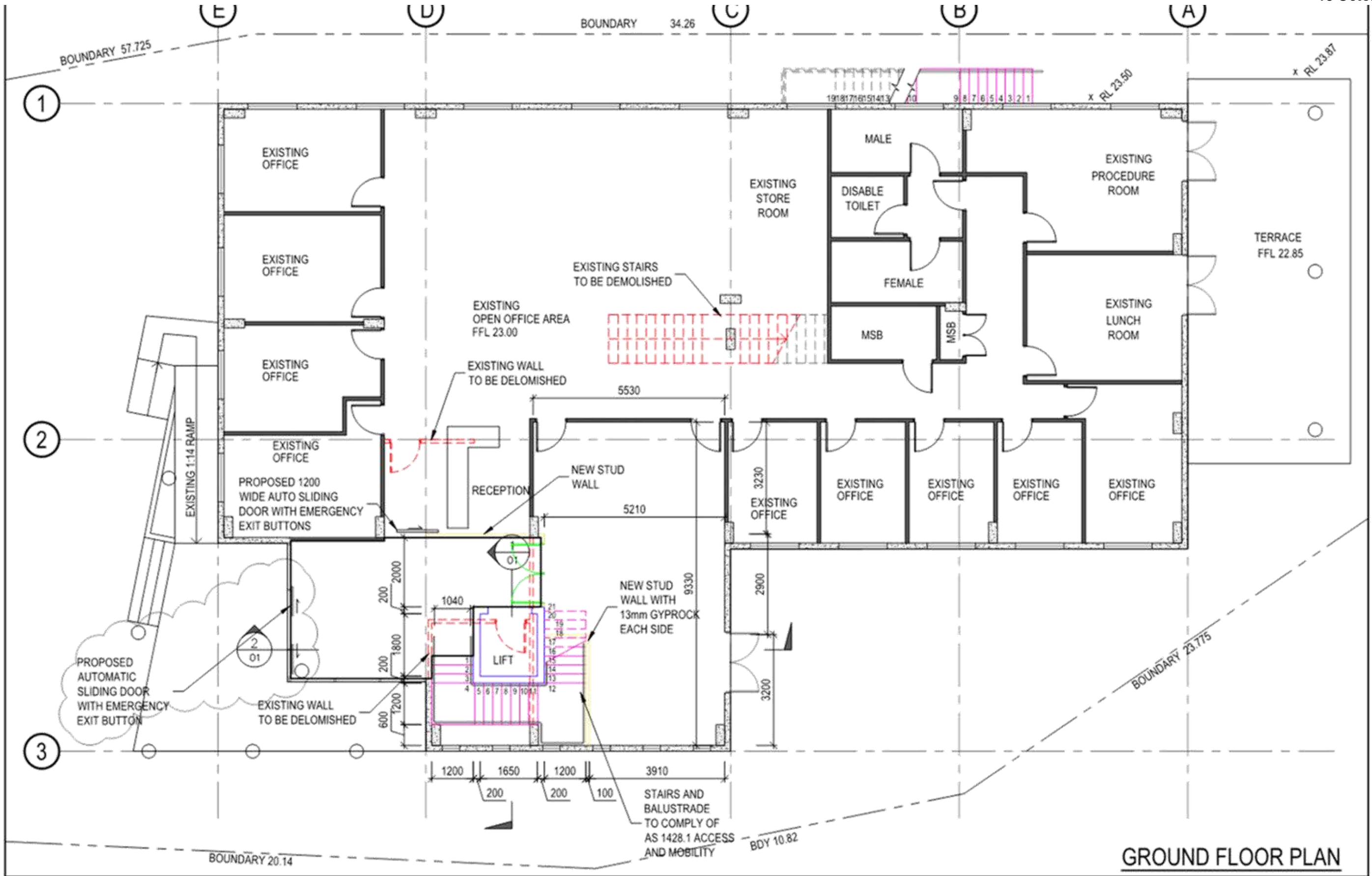
Scale:
 1:250

Drawn by:
 R.K.

Drawing No:
 DA01

Issue:
 03

Drawing Status:



GROUND FLOOR PLAN

RMJ Building Group Pty Ltd
 ABN: 61 523 700 107
 Lic No: 319662C
 38 Hunter Street,
 Condell Park NSW 2200
 m. 0426 808 808

Rev:	Date:	Notes:	BY:
01	02-02-2021	ISSUE FOR DA SUBMISSION	R.K.
02	18-05-2021	FIRE EXIT ADDED	R.K.
03	06-10-2021	ISSUE FOR CONSTRUCTION CERTIFICATE	R.K.
04	28-10-2021	MAIN ENTRY DOOR CHANGED TO SLIDING	R.K.

DEVELOPMENT APPLICATION

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 25 SOUTH PDE AUBURN
 LOT 2
 DP 806999

Project:
 PROPOSED NEW LIFT & STAIRS

Drawing Title:
 GROUND FLOOR PLAN

Client:
 DR E. KEHDI

Consultant:

Date:
 02-02-2021

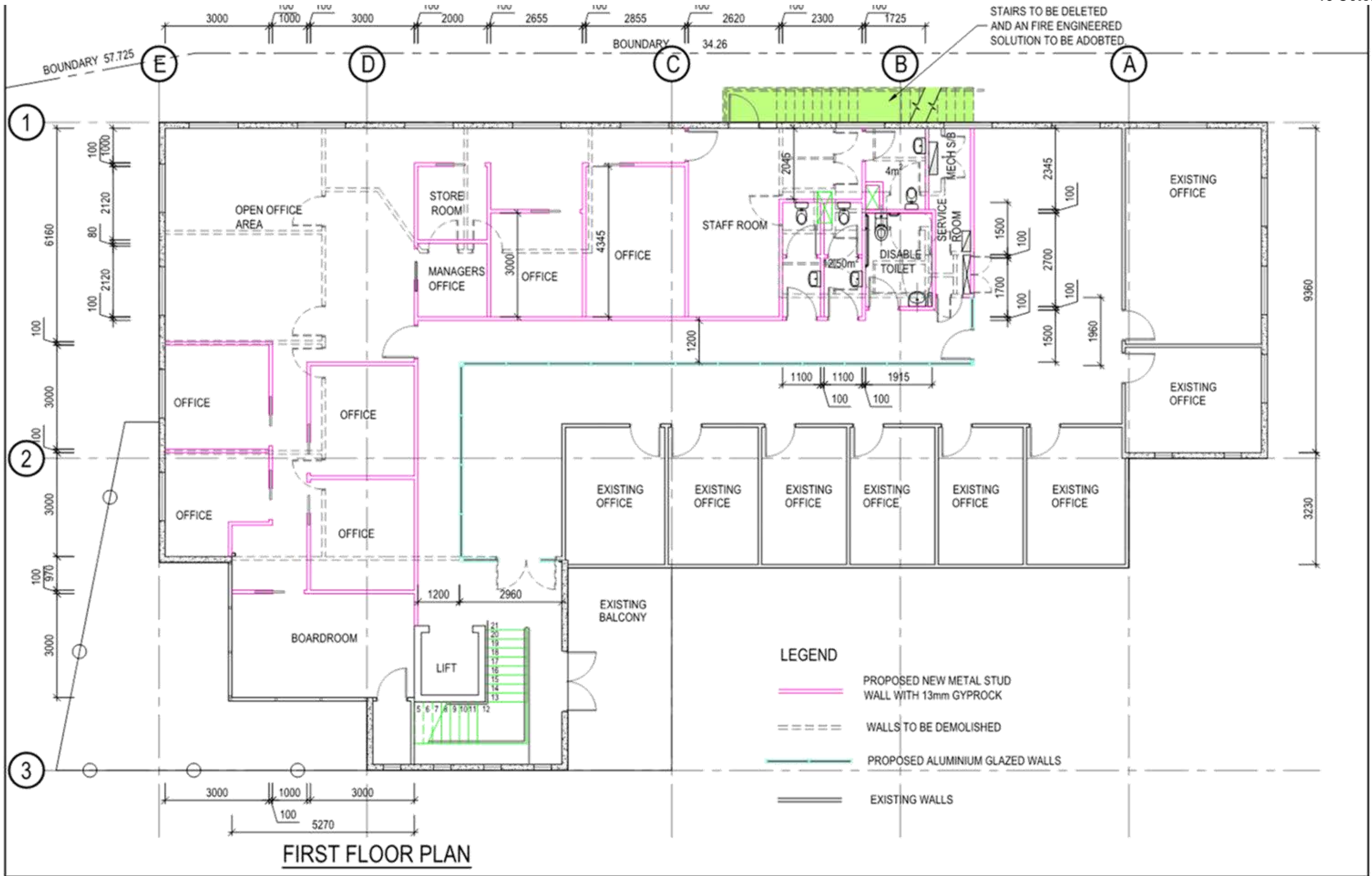
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Drawn by:

Drawing No:
 DA02

Issue:
 04

Drawing Status:



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 ABN: 61 523 700 107
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 38 Hunter Street,
 Condell Park NSW 2200
 m. 0426 808 808

Rev:	Date:	Notes:	BY:
01	02-02-2021	ISSUE FOR DA SUBMISSION	R.K.
02	18-05-2021	FIRE EXIT ADDED	R.K.
03	06-10-2021	ISSUE FOR CONSTRUCTION CERTIFICATE	R.K.
04	28-10-2021	BALUSTRADE ADDED TO COMPLY WITH AS1428	R.K.
05	02-03-2022	ISSUED FOR SECTION 4.55	R.K.
06	24-03-2022	ISSUED FOR SECTION 4.55	R.K.

DEVELOPMENT APPLICATION

Do not scale drawings. Use figured dimensions only. Check & verify levels and dimensions on site prior to the commencement of any work, the preparation of shop drawings or the fabrication of components.

This drawing is the copyright of RMJ BUILDING GROUP and is protected under the Copyright Act 1968. Do not alter, reproduce or transmit in any form, or by any means without the express permission of RMJ BUILDING GROUP.

Job Address:
25 SOUTH PDE AUBURN
LOT 2
DP 806999

Project:
PROPOSED NEW LIFT & STAIRS

Drawing Title:
FIRST FLOOR PLAN

Client:
DR E. KEHDI

Consultant:

Date: 02-02-2021	Drawing No: DA03
Scale: 1:100	Issue: 06
Drawn by:	Drawing Status:

**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 10
Preliminary Consultation Report**



CUMBERLAND
CITY COUNCIL

Evaluation Summary

25 South Parade Auburn - Early Consultation

Philippa Borland – Coordinator Community Engagement & Communications



EVALUTATION SUMMARY



Executive Summary

Council invited the community to comment on a planning proposal request (proponent initiated) to amend planning controls for a site at 25 South Parade, Auburn. The Proposal seeks to facilitate the redevelopment of an underutilised site (including a building) located within the Auburn Town Centre which is currently zoned IN1 General Industrial.

Have Your Say

Council's community engagement team created a landing page specifically for the consultation on 25 South Parade, Auburn on Council's community engagement platform – Cumberland Conversations – as the main point of information for the community. The page was set up as a 'Consultation' project, and included:

- Summary of the information;
- Key dates;
- Exhibition documents; and
- Opportunity to provide feedback.

During the consultation, there were nil submissions received.



Engagement activity

Key statistics from the page can be found below:

Total Page Views	Total Document Downloads	Aware Stakeholders	Informed Stakeholders	Total Submissions
324	252	50	74	Nil

Document Downloads

Document	No of Downloads
1. Amended Planning Proposal Request - 25 South Parade, Auburn	53
2. Urban Design Analysis	28
3. Traffic and Parking	27
4. Economic Impact Assessment	15
5. Preliminary Site Investigation	21
6. Acoustic Letter	18
7. Heritage Impact Assessment	42
8. Letter of Offer	17
9. Social Impact Comment	12
10. Existing Plans	19



Electronic Direct Mail

Community Engagement facilitated project communication over the exhibition period to identified stakeholder groups and organisations that have registered their interest in council projects. The South Street Auburn Early Consultation was included in the September Have Your Say newsletter as a featured project, which notified these groups/organisations on:

- Information about the planning proposal request;
- The project exhibition period; and
- How to lodge a submission.

Newspapers

Newspaper advertisements were created and placed in the Auburn Review and Parra News. This was put in place to reach a wider audience. Advertisements were placed in both papers on the following date:

- 27 September 2022
- 4 October 2022

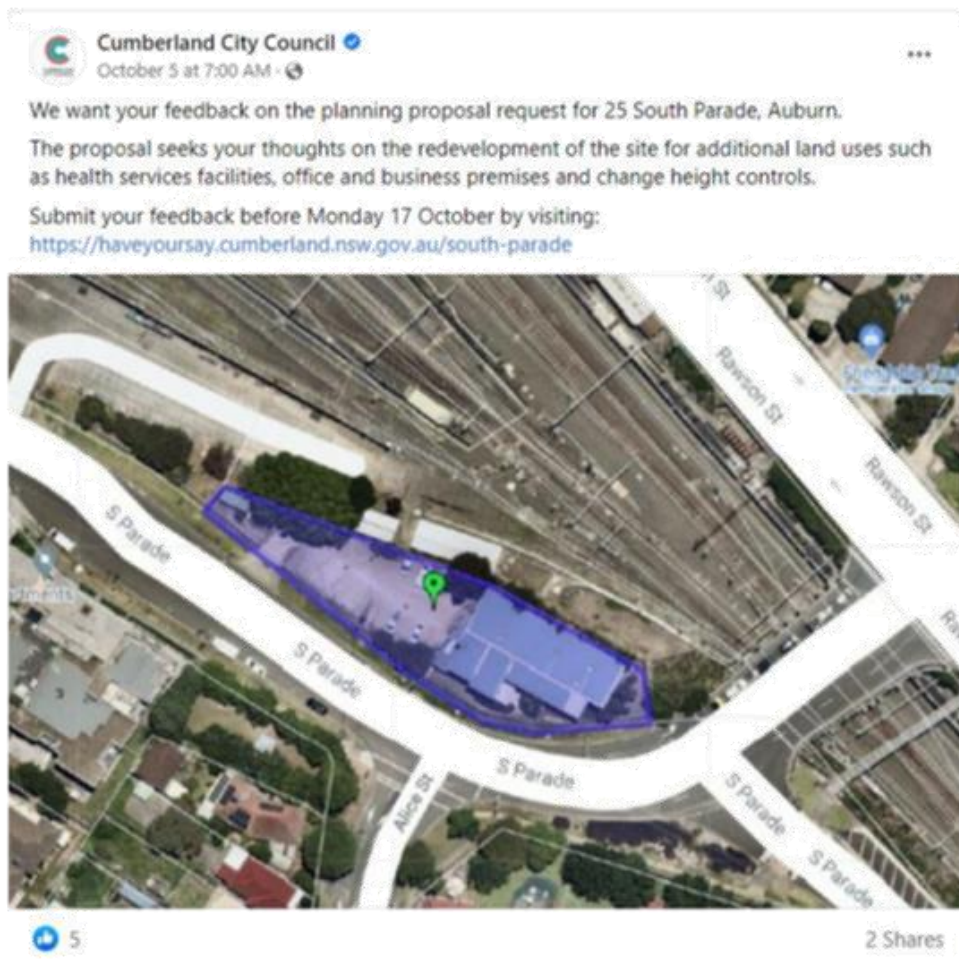




Social Media

Targeted social media via Cumberland's Facebook page was utilised to inform the community of the consultation. The social media notice was posted on the following date:

- 5 October 2022
- 12 October 2022
- 15 October 2022



The posts had the following engagement:

- 7 likes
- 2 shares

Terminology



- *Aware: Number of unique visitors who have viewed the project page, minus any visitors who have undertaken any activity eg: downloaded a document, viewed a video, completed a survey etc.*
- *Informed: Any unique visitor who has viewed a latest news item, viewed a document, viewed a video, viewed a FAQ minus any user that has engaged eg: done a poll, survey, ideas wall, interactive mapping, interactive document, forum.*
- *Engaged: Any unique visitor who has done a poll, survey, ideas wall, interactive mapping, interactive document, forum.*

END OF REPORT.

**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 11
TfNSW Submission**

Transport for NSW



20 October 2022

TfNSW Reference: SYD22/01178/01

Council Reference: PP2022/0004

Mr Peter J Fitzgerald
General Manager
Cumberland City Council
16 Memorial Avenue, Merrylands NSW 2160
PO Box 42, Merrylands NSW 2160

Dear Mr Fitzgerald,

RE: PRE-PLANNING PROPOSAL, 25 SOUTH PARADE, AUBURN

Transport for NSW (TfNSW) appreciates the opportunity to comment on the above proposal, which was referred to us by Council in correspondence dated 26 September 2022.

TfNSW has reviewed the exhibited documentation supporting the Pre-Planning Proposal. We note that the proposal for the site seeks to amend the *Cumberland Local Environmental Plan 2021* (the LEP) to:

- Amend the Additional Permitted Uses Map for the subject site to identify the site for additional permitted uses referenced in Schedule 1 of the LEP;
- Amend Schedule 1 to include a provision relating to the subject site that would permit development for the purposes of health services facilities, office and business premises; and
- Amend the Height of Buildings (HOB) Map for the subject site to establish a maximum HOB of 9m.

TfNSW's detailed comments are provided in **Attachment A**. It is requested that the comments provided are satisfactorily addressed and/or considered by Council and the Local Planning Panel *prior* to any submission of the planning proposal to the Department of Planning and Environment (DPE) for Gateway review.

Should you have any questions or further enquiries in relation to this matter, please don't hesitate to contact Senior Land Use Planner – Andrew Popoff on 0413 459 225 or via email: Andrew.Popoff@transport.nsw.gov.au

Yours sincerely



Peter Mann
A / Senior Manager Strategic Land Use
Land Use, Network & Place Planning, Greater Sydney Division



Attachment A: TfNSW comments on the Pre-Planning Proposal, No 25 South Parade, Auburn
(20 October 2022)

Comment / Recommendations – Sydney Trains:

- The proposed allowable Building Height of the subject area located adjacent to Sydney Trains rail corridor, the Main Western Line, west of Auburn Station and land owned by Transport Asset Holding Entity (TAHE), whilst supported in principle, will require future potential Applicants/Developers to approach Sydney Trains early in the design process (as part of pre-DA discussion) to ensure that all relevant Sydney Trains matters of consideration are taken into account and are incorporated into the future design of the development. These considerations include relevant requirements and standards within *State Environment Planning Policy (Transport and Infrastructure) 2021, 'Development Near Rail Corridors and Busy Roads – Interim Guidelines', Asset Standards Authority, etc.*
- Council should also consider how this future development site will be serviced. Sydney Trains will not allow private party (i.e. developer/landowner) services to utilise its corridor (especially for drainage) and requests that such matters be considered early in the process to ascertain the need for an alternate solution, collection of developer contributions, or re-consideration of development potential. Sydney Trains is happy to discuss such items early in the process.
- Sydney Trains may also have a number of High Voltage aerial powerlines off the corridor in the local streets which should be accounted for as that can impact greater dwelling densities. Depending on the voltage, developments will need to be setback from these powerlines, and this may affect development potential. Council should consider the collection of developer contributions where risk mitigation is required to enable the undergrounding of the overhead powerlines, and possibly have this work done prior to development applications being lodged.
- There is an existing easement along the western and southern boundary of the subject site, which benefits Sydney Trains. No work is permitted within the rail corridor or any easements which benefit Sydney Trains / TAHE (Transport Asset Holding Entity), at any time, unless the prior approval of, or an Agreement with, Sydney Trains / TAHE (Transport Asset Holding Entity) has been obtained by the Applicant.
- Future health services facilities development on the site would be impacted by train noise and vibration, as the site is close to the Auburn Railway Line. An Acoustic report in accordance with the DPE's interim guidelines must be provided along with the future development application to ensure that the health services facilities development will account for vibration and noise from the rail corridor.
- An adequate setback must be maintained across the entire length of a new development as it abuts the common boundary with the rail corridor, this is required for future constructability and maintenance purposes. Setbacks from TAHE owned land should also take into consideration potential for re-purposing of the rail land at a later time if / when it is no longer required for rail purposes.
- Any future proposal must be supported by a Traffic Management Plan for the construction phase, and future operation phase, to demonstrate that additional vehicular movements in and out of the site do not pose queuing issues along the South Parade overbridge, and potentially obstruct rail corridor access. The rail corridor access point/s must not be blocked at any stage during the construction and operation phases



of future developments on the subject site. Rail bridge load restrictions must also be considered and adhered to, as related to construction-related vehicles.

- Transport for NSW Property & Commercial Services (TfNSW P&CS) has the delegation to act on behalf of Transport Asset Holding Entity (TAHE – formerly known as RailCorp) TAHE, the landowner of rail land. As TAHE is a landowner within the subject area, it is requested that Council and future nearby developers liaise with TfNSW Property & Commercial Services throughout each stage of the planning and development process of this site. We can be contacted via DA_sydneytrains@transport.nsw.gov.au.

Comment / Recommendations – Traffic and Parking Impact Assessment Report / VPA letter of Offer:

- TfNSW supports the following Recommendation / Conclusion made within the exhibited Traffic and Parking Impact Assessment Report, which states:

“In order to provide pedestrian safety and to encourage public transport use of any activity at the site, it is highly recommended that a pedestrian crossing on the western approach be constructed at the signalised intersection of South Parade with Alice Street. This is an existing infrastructure deficiency.”

We note through the exhibited documentation that the proponent is willing to consider entering into a Voluntary Planning Agreement (VPA). Should this proposal obtain Gateway Approval, TfNSW would recommend that any future supporting VPA with this site include a commitment to construct / implement a signalised pedestrian crossing on the western side of the signalised intersection of South Parade / Alice Street.

- On pages 11 and 12 of the Traffic and Parking Impact Assessment Report (i.e. Figures 6c and 6d), the Consultant has incorrectly modelled the signalised intersection of South Parade / Rawson Street. Their SIDRA layout has the South Parade approach as dual left and single right, when this approach is actually single left and dual right. This needs to be corrected as it will have an impact upon the traffic modelling results at this intersection.

DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404

Attachment 12
EPA Submission



DOC22/872712-3

4 October 2022

Harinee De Silva
Senior Strategic Planner
Cumberland Council

harinee.desilva@cumberland.nsw.gov.au

Dear Ms De Silva

**25 South Parade Auburn Planning Proposal
No Comment on Rezoning Proposal**

I am writing to you in reply to your invitation to the NSW Environment Protection Authority (EPA) to provide comment on this planning proposal.

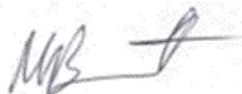
The EPA understands that the proposal seeks to amend the Cumberland Local Environmental Plan (LEP) 2021 to include additional permitted uses of health services facilities, office premises, business premises and a maximum building height of 9m at 25 South Parade, Auburn.

Based on the information provided, the EPA has no comment on this proposal and no further consultation is required. This is because:

- the proposal is unlikely to lead to activities that will constitute a Scheduled Activity under Schedule 1 of the *Protection of the Environment Operations Act* (1997) and so, will not require an Environment Protection Licence under this Act,
- the proposal is unlikely to lead to activities that will be undertaken by or on behalf of a NSW Public Authority, nor are there likely to be other activities for which the EPA is the appropriate regulatory authority.
- the site is not being regulated by the EPA under the *Contaminated Land Management Act* (1997).

Should you require clarification of any of the above please contact Damien Rose on (02) 9995 5586 or email environmentprotection.planning@epa.nsw.gov.au

Yours sincerely



MITCHELL BENNETT
Unit Head – Statutory Planning

**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 13
Letter of Offer**

4 August 2022

Cumberland City Council
The General Manager
PO Box 42
MERRYLANDS NSW 2160

Dear Sir/Madam,

**RE: LETTER OF OFFER TO CONSIDERATION OF ENTERING VOLUNTARY PLANNING AGREEMENT (VPA)
FOR PLANNING PROPOSAL 25 South Parade, AUBURN (PP-2022/2040)**

Introduction

South Parade Auburn Pty. Limited is the proponent for the Planning Proposal (PP-2022/2040) relating to the land at 25 South Parade, Auburn.

The Planning Proposal seeks amendment to the provisions of the Cumberland Local Environmental Plan 2021 (CLEP 2021) as it applies to the subject site. It relies on an amendment to the CLEP 2021 to facilitate the future use of the site and existing building for the purposes of health service facilities, office and business premises.

In conjunction with the Proposal, South Parade Auburn Pty. Limited is willing to consider entering into a voluntary planning agreement (VPA) with Council under Section 7.4 of the *Environmental Planning and Assessment Act 1979* (EPA Act).

Our Offer

- The parties to the VPA would be between Cumberland City Council and South Parade Auburn Pty. Limited.
- The land which is the subject of the VPA is Lot 2, DP 806999, 25 South Parade, Auburn.
- Sections s7.11 contributions, s7.12 levies and s7.24 of the EPA Act will continue to apply to the development.

Please contact me if you have any questions.



Yours faithfully,

Dr Elias Kehdi
Director
South Parade Auburn Pty Limited

**DOCUMENTS
ASSOCIATED WITH
REPORT C10/23-404**

**Attachment 14
Cumberland Local Planning
Panel Advice**

ITEM LPP026/23 - PLANNING PROPOSAL FOR 25 SOUTH PARADE, AUBURN

PANEL DECISION:

That Cumberland Local Planning Panel (CLPP) recommend that Council supports, for the purpose of a Gateway Determination, a planning proposal for 25 South Parade, Auburn, that seeks to amend Schedule 1 of Cumberland LEP 2021 to permit office premises and a medical centre as additional permitted uses (APUs) on the site, and to introduce a maximum building height of 11m on the site for these uses.

For: Michael Leavey (Chairperson), Garry Chapman, Helen Deegan and Virginia Sinclair.

Against: Nil.

ITEM LPP022/23 - DEVELOPMENT APPLICATION FOR 266 RAILWAY TERRACE, GUILDFORD

PANEL DECISION:

The Panel has taken into consideration the original report and the legal advice provided by Council that Clause 4.6 variations are not required in the circumstances, and therefore the Panel is unable to determine the development application which is returned to Council staff for determination.

For: Michael Leavey (Chairperson), Garry Chapman, Helen Deegan and Virginia Sinclair.

Against: Nil.

ITEM LPP023/23 - DEVELOPMENT APPLICATION FOR 264 RAILWAY TERRACE, GUILDFORD

PANEL DECISION:

The Panel has taken into consideration the original report and the legal advice provided by Council that Clause 4.6 variations are not required in the circumstances, and therefore the Panel is unable to determine the development application which is returned to Council staff for determination.

For: Michael Leavey (Chairperson), Garry Chapman, Helen Deegan and Virginia Sinclair.

Against: Nil.

