



Submissions and Amendment Report

16-20 Old Castle Hill Road

Submitted to the Department of Planning, Housing and Infrastructure
on behalf of UPG Castle Corner Pty Ltd

SSD-85238209

Prepared by Colliers Urban Planning

24 July 2026 | 2240250



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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D. Amended Landscape Drawings	Arcadia
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F. Transport Impact Response	Stantec
G. Revised Pedestrian Wind Study	RWDI
H. Pedestrian Wind Environment Cover Letter	RWDI
I. Amended Survey Plan	SDG
J. Fire Engineering Statement of Support	E-Lab Consulting
K. Catchment Plan	BG&E
L. Swept Paths	Stantec
M. Survey Plan	SDG
N. Email Correspondence on WAL	Douglas Partners
O. Design Response to SDRP	Studio SC

1.0 Introduction

This Submission and Amendment Report has been prepared by Colliers Urban Planning on behalf of UPG Castle Corner (the Applicant) to address the matters raised during the exhibition of the SSDA for a proposed residential development, including affordable housing (SSD-85238209) located on land at 16-20 Old Castle Hill Road, Castle Hill

The SSDA was lodged with the Department of Planning, Housing and Infrastructure (DPHI) and was publicly exhibited for 14 days from 27 February 2026 until 12 March 2026. The subsequent request for a response to submissions was issued by DPHI on 17 March 2026. A total of 6 submissions were received from relevant government agencies and organisations, while a total of 30 submissions were received from the public during the exhibition period.

This Submissions and Amendment Report provides an analysis of submissions, actions taken since consideration of the public submissions, the Applicant's response to submissions and provides a description of the amendments to the proposal and an updated justification of the proposed development. It is accompanied by supporting information and technical reports (refer to the Table of Contents).

This Submissions and Amendment Report, as required under section 59(2) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), has been prepared in accordance with the DPHI's *State Significant Development Guidelines*, including *Appendix C – Preparing a Submissions Report* and *Appendix D – Preparing an Amendment Report*.

The SSDA, as exhibited, sought approval for the Mixed-Use Development and Rezoning at 16-20 Old Castle Hill Road, Castle Hill, NSW, 2154. Specifically, the exhibited development sought consent for the following:

- The construction of a 40-storey building, comprising:
 - 371 apartment dwellings, including 42 affordable housing dwellings managed by a community housing provider for 15 years;
 - Communal open spaces;
 - One (1) Ground Floor retail tenancy;
- The construction of six (6) levels of basement carparking, including the provision of:
 - 386 car parking spaces; and
 - 160 bicycle parking spaces;
- Public domain improvements and landscaping works, including:
 - The creation of a welcome entry plaza located on the corner of Old Castle Hill Road and McMullen Avenue;
 - Planting across the site; and
 - The creation of internal footpath network; and
- The augmentation and servicing of infrastructure as required.

2.0 Analysis of Submissions

This section analyses the submissions received by providing a breakdown of the type of submissions received and identifying the issues raised.

2.1 Breakdown of Submissions

A total of 30 submissions were received from the public during the exhibition period. Of the 30 submissions received, 1 was in support, 1 was to provide comment, and 28 were objecting to the proposal.

Submissions were received from the following government agencies and organisations:

- Department of Planning, Housing and Infrastructure
- The Hills Shire Council
- Sydney Metro (RFI)
- NSW Department of Climate Change, Energy, the Environment and Water
- Transport for NSW
- Endeavour Energy
- Sydney Water

A submissions register is provided at **Appendix A**, which identifies where issues raised in each submission have been addressed in this report. A response to each of the issues raised in the submission is provided in **Appendix B**.

2.2 Categorising Issues

A summary of the key issues raised in submissions received is provided in **Table 1**. The submissions register is provided at **Appendix A** provides further detail as to issues raised by individual submissions, with a response to all key issues raised provided in **Appendix B** within the Detailed Response to Submissions.

Table 1 Summary of Raised Issues

Category	Issue
The Project	Design:
	• Bulk, height and scale. • Tower separation and setbacks.
Procedural Matters	Statutory Compliance
	• Compliance with EP&A Act. • Compliance with The Hills Shire Local Environmental Plan (LEP). • Compliance with The Hills Shire Development Control Plan (DCP).
	Apartment Design Guide
	• Compliance with the ADG.
	Community Consultation
	• Concerned about inadequate community consultation.
	Documentation
	• Concerns cumulative impacts of approved developments not included in modelling and reports. • Absence of overshadowing and solar access modelling. • Concerns about the accuracy of traffic modelling. • Desire for a traffic management plan.

Economic, Environmental and Social Impacts	Traffic • Traffic during the construction period. • Operational traffic. • Safety concerns. • Parking concerns.
	Overshadowing and Solar Access • Overshadowing of private dwellings, private open space and public open space. • Overshadowing impacts of cumulative surrounding developments. • Light spill. • Concerns of personal cost incurred to mitigate overshadowing issues.
	Construction Work Impacts • Dust, debris and hazardous materials. • Noise and vibration.
	View Loss • Loss of local and district views.
	Amenity • Reaction of local and environmental liveability. • Impact on liveability, health and wellbeing.
	Privacy • Sightlines and overlooking into neighbouring properties.
	Overdevelopment • Overcrowding. • Insufficient surrounding infrastructure.
	Environmental • Loss of green space. • Loss of environmental benefits associated with established vegetation.
	Neighbourhood Character • Changing of existing character.
	Economic • Questions the economic viability of development. • Loss of property value.
Project Justification and Evaluation	Strategic Planning and Rezoning • Concern rezoning to increase FSR is not strategically justified. • Concern of precedent-setting with increased FSR.
	Evaluation • Impact of development on amenity to be considered.
Issues Beyond the Scope of the Project	Early Works • Impacts associated with the construction of the basement levels • Safety concerns. • Environmental impacts.

3.0 Engagement undertaken since EIS Lodgement

3.1 Community and Stakeholder Engagement

The Applicant is committed to ongoing community consultation through the project lifecycle. The approach to community engagement is informed by DPHI's *Undertaking Engagement for State Significant Projects* (2024). The project team recognises the need to genuinely consider feedback received as part of the planning and design process.

Consultation relating to the project has been extensive, including engagement with the local community, neighbours, key stakeholders and government authorities throughout the life of the project, including prior to the submission of the application, as documented in the EIS prepared by Colliers Urban Planning and dated 9 February 2026.

Consultation during and after the exhibition period with the key stakeholders and the community is summarised in this section. During the consultation period, multiple channels were used to engage with the community and stakeholders.

A meeting with the State Design Review Panel (SDRP) was held on 14 May 2026 with the proponent and the relevant consultants. This is the first review of the scheme by the SDRP under the HDA SSD pathway, noting that earlier advice was issued by the Government Architect NSW (GANSW) following two previous SDRPs held under the In-fill Affordable Housing SSD pathway. The core topics raised by the SDRP include:

- The tower form, practicality the size of the floor plates.
- The revised schemes relationship with surrounding context.
- The relationship between deep soil and the basement.
- Affordable housing clarifications.

Following the feedback from the SDRP, further consultation was undertaken with DPHI on the scheme and amendments proposed following the SDRP meeting. During consultation, DPHI provided their support on a revised, more slender design, including amending the scheme to include a maximum 42 storeys on the basis that:

- The overall proposed FSR is reduced compared to what was lodged.
- The shoulder form of the tower does not exceed 30 storeys.
- The overall form is amended to be more slender compared to what was lodged, to reduce bulk and scale.
- Overshadowing to Arthur Whitling Park is reduced compared to what was lodged.

As described in **Section 4.0** the revised design has been amended based on the feedback from the community and stakeholders, particularly in relation to feedback from DPHI and the SDRP. A written response to the SDRP feedback is provided by Studio SC in **Appendix O**.

3.2 Project Refinement

In response to matters raised in the submissions, and as a consequence of ongoing design development, the Applicant has refined the project for which consent is sought as described in **Section 4.0**.

3.3 Further Assessment

In response to matters raised in the submissions and as a consequence of the project amendments described in **Section 4.0**, the Applicant has undertaken further environmental assessment of the project as undertaken in **Section 6.0**.

4.0 Description of Project Amendments

This section sets out the amendments made to the project since public exhibition of the EIS, which have been made as a result of ongoing design development and project refinement, and in response to matters raised in submissions and by the SDRP and DPHI.

4.1 Project Amendments Since Exhibition

The proposed amendments to the development are described below:

- **Height and scale:** The tower form has increased to 42 storeys, while the width of the midrise portion of the tower from Level 6 and above has been reduced, creating a more slender building form.
- **GFA reduction:** An overall reduction in GFA (and therefore FSR) results from the changes to the built form.
- **Affordable housing revisions:** The provision of affordable housing has been amended from an offer of 15% for 15 years, to 3% in perpetuity.
- **Basement extent reduction:** Reduction of the basement footprint in the northern corner of the site and further setback from Garthowen setback away from boundary.
- **Car parking reduction:** Removal of 33 parking spaces as a result of the reduction in basement extent.
- **Bicycle parking increase:** Addition of 19 bicycle parking spaces including internal bicycle storage on Ground Floor.
- **Extended ground-level awning:** Enlargement of the awning at the ground level, northern corner.
- **Increased southern elevation screening:** Additional screening on the southern façade from Levels 5 to 39.
- **Balustrade height increase:** Increase of the communal open-space balustrade height at Level 30 to 1.9m.
- **Ground Floor entry:** The resident entry circulation has been refined on the Ground Floor.
- **Unit mix and dwelling numbers:** Modifications have been made to apartment layouts, sizes, and the dwelling mix, resulting in an increase in the number of dwellings to 392.
- **Unit reconfiguration:** Amendments to apartment configurations and layout.
- **Façade:** Amendments to the façade colour palette, materiality and structure.

4.2 Revised Proposal Overview

As a consequence of the project changes outlined in **Section 4.1**, the key project information has been updated. The majority of the amendments to plans are minimal and do not impact the project overview.

4.2.1 Project Overview

The Main Works comprise the following:

- The construction of a **40 42**-storey building, comprising:
 - **374 392** apartment dwellings, including **42 9** affordable housing dwellings managed by a community housing provider **for 15 years in perpetuity**;
 - Communal open spaces;
 - One (1) Ground Floor retail tenancy;
- The construction of six (6) levels of basement carparking, including the provision of:
 - **387 353** car parking spaces; and
 - **460 179** bicycle parking spaces;
- Public domain improvements and landscaping works, including:
 - The creation of a welcome entry plaza located on the corner of Old Castle Hill Road and McMullin Avenue;
 - Planting across the site; and
 - The creation of internal footpath network; and

- The augmentation and servicing of infrastructure as required.

4.3 Built Form Amendments

4.3.1 Height and Bulk

The proposed scheme incorporates several refinements to the previously proposed built form. The high rise, pencil form of the tower has increased in height from 40 to 42 storeys, while the midrise portion of the tower has been reduced in width from Level 6 and above to reduce the overall bulk and scale of the development. The midrise portion of the tower retains the same number of storeys as originally proposed in the EIS (30 storeys).

Collectively, the amendments result in a more slender tower form and an improved urban design outcome, while maintaining the overall development intent.

Through this reduction in bulk, the FSR of the proposal has reduced from 11.55:1 to 10.97:1. This represents as considerable reduction in mass and built form, reflected through the slender form of the tower.



Submitted (showing outline of proposed amendments dashed blue)



Proposed (showing outline of originally lodged scheme dashed blue)

Figure 1 *Proposed bulk and scale amendments*

Source: Studio SC

4.3.2 Setbacks

In response to concerns regarding future road widening along McMullen Avenue, the southern frontage of the building is proposed to be set back further from the boundary, in order to ensure that there is sufficient space for the front of this building to respond to a future widened road scenario, should that occur. This amendment is shown in **Figure 2**.

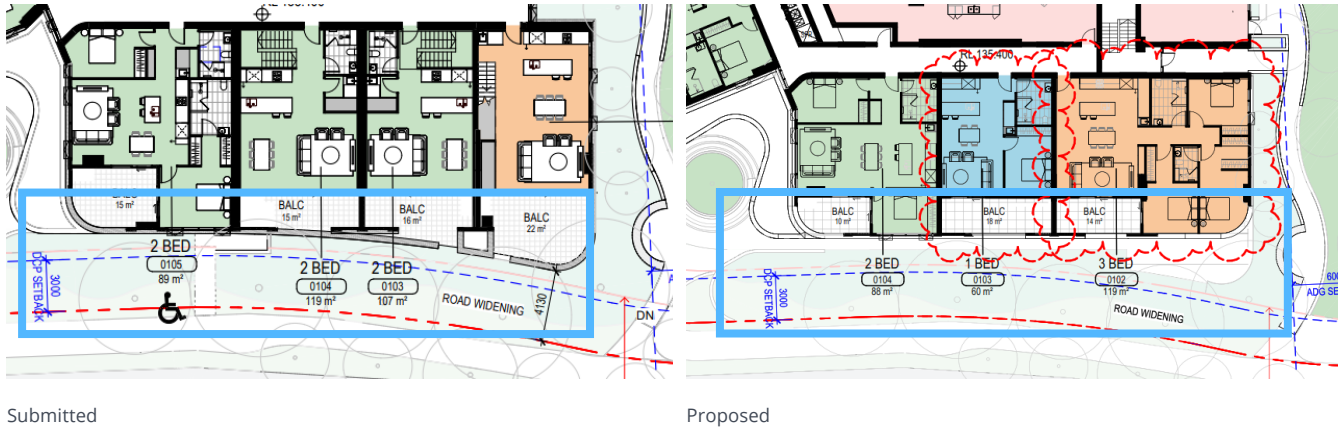


Figure 2 Street frontage set back amendments

Source: Studio SC

4.4 Basement Extent and Configuration

The basement extent has been recessed from Garthowen Crescent to accommodate the area required for future road widening, and reduced in its easterly extent to provide for an improved deep soil outcome. The deep soil amount now achieves the ADG design criteria of 15%.

A comparison between the original basement layout and the proposed revised extent is provided in **Figure 3**.

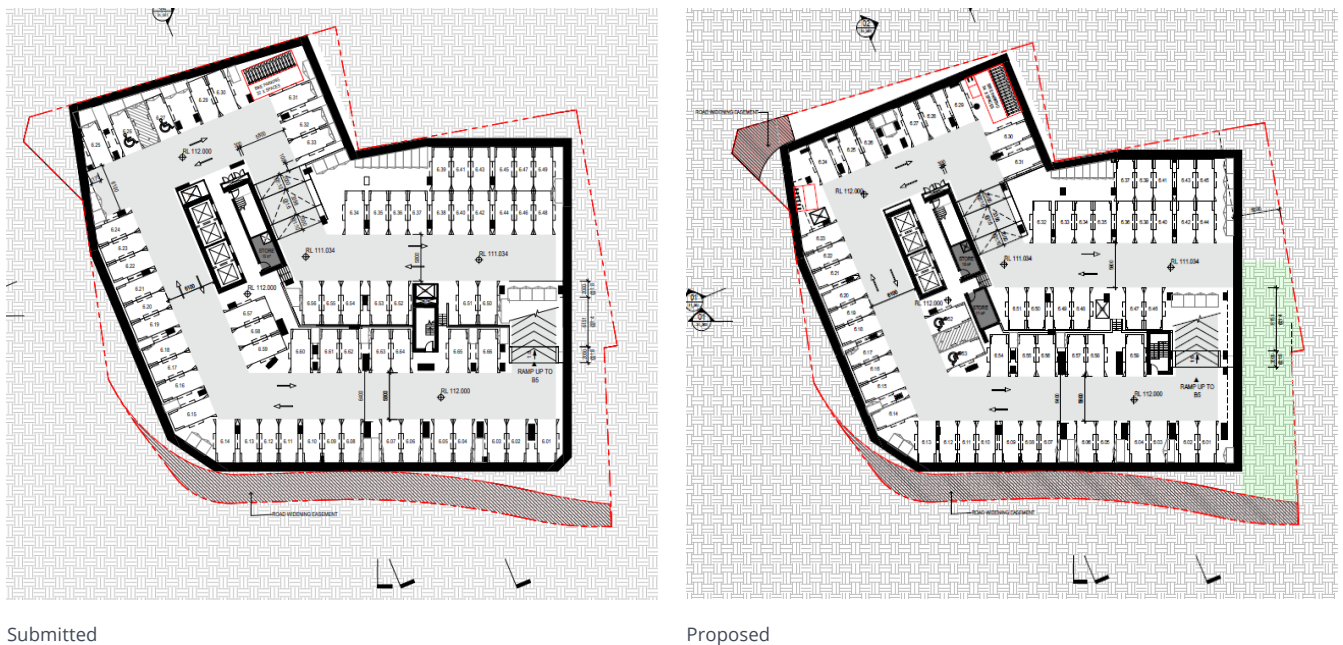


Figure 3 Revised excavation extent compared to the originally submitted design

Source: Studio SC

4.5 Car Parking Reduction

As a result of the reduction in the basement extent to accommodate greater deep soil, the overall parking provision has been reduced by 33 spaces. A comparative table has been provided below in **Table 2**.

Table 2 Comparison of the originally proposed car parking and the amended car parking

Basement Level	Originally Proposed	Amended
Ground floor	1	1
Basement 1	64	58
Basement 2	64	58
Basement 3	64	59
Basement 4	64	59
Basement 5	64	59
Basement 6	65	59
Total	386	353

4.6 Increase in Bike Parking

Bicycle parking has been increased from 160 to 179 spaces to improve support for active transport use for residents. Bicycle parking is now provided on the Ground Floor with direct and step-free access from the street (**Figure 4**). A comparative table has been provided below in **Table 3**.

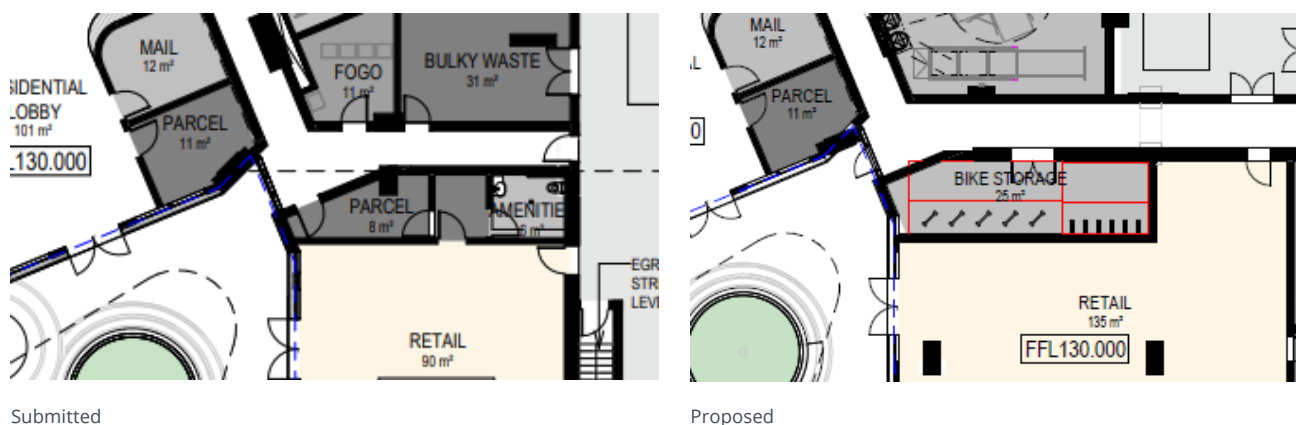


Figure 4 Proposed bike storage on Ground Floor

Source: Studio SC

Table 3 Comparison of the originally proposed bicycle parking and the amended bicycle parking

Basement Level	Originally Proposed	Amended
Ground Floor	0	10
Basement 2	32	26
Basement 3	32	26
Basement 4	32	26
Basement 5	32	26
Basement 6	32	65
Total	160	179

4.7 Extended Ground-level Awning

The Level 1 northern awning has been extended as shown within **Figure 5**. The awning extent has been extended to the northern boundary and to the northwestern corner to provide increased coverage. This is in response to suggested wind mitigation measures recommended by RWDI.



Submitted



Proposed

Figure 5 Originally submitted awning compared to the revised awning extent

Source: Studio SC

4.8 Increase Southern Boundary Screening

In response to SDRP feedback, the revised Architectural Drawings prepared by Studio SC at **Appendix C** have been amended to add additional screening to the southern façade from levels 5 to 39. Refer to **Figure 6** below. This change includes an additional panel of screening at the southern boundary; it has very minor visual impacts and is not noticeable when compared to the previously proposed plans.



Figure 6 Originally submitted southern elevation compared to the revised additional screening

Source: Studio SC

4.9 Balustrade Height Increase

The revised Architectural Drawings prepared by Studio SC at **Appendix C** have been amended to increase the balustrade height encompassing the Level 30 communal open space. The revised balustrade height is 1.9m and is shown in **Figure 7**.

This balustrade height increase is as a result of recommendations from RWDI with regard to wind impacts.



Figure 7 Originally submitted balustrade compared to the revised balustrade height at Level 30,

Source: Studio SC

4.10 Refined Entry

The resident entry point from the public domain has been refined to improve its clarity and legibility from the street. The previous entry, which had a triangular form, has been redesigned with a straightened alignment to provide a more prominent arrival point with improved sightlines for residents.

Refer to **Figure 8** below.

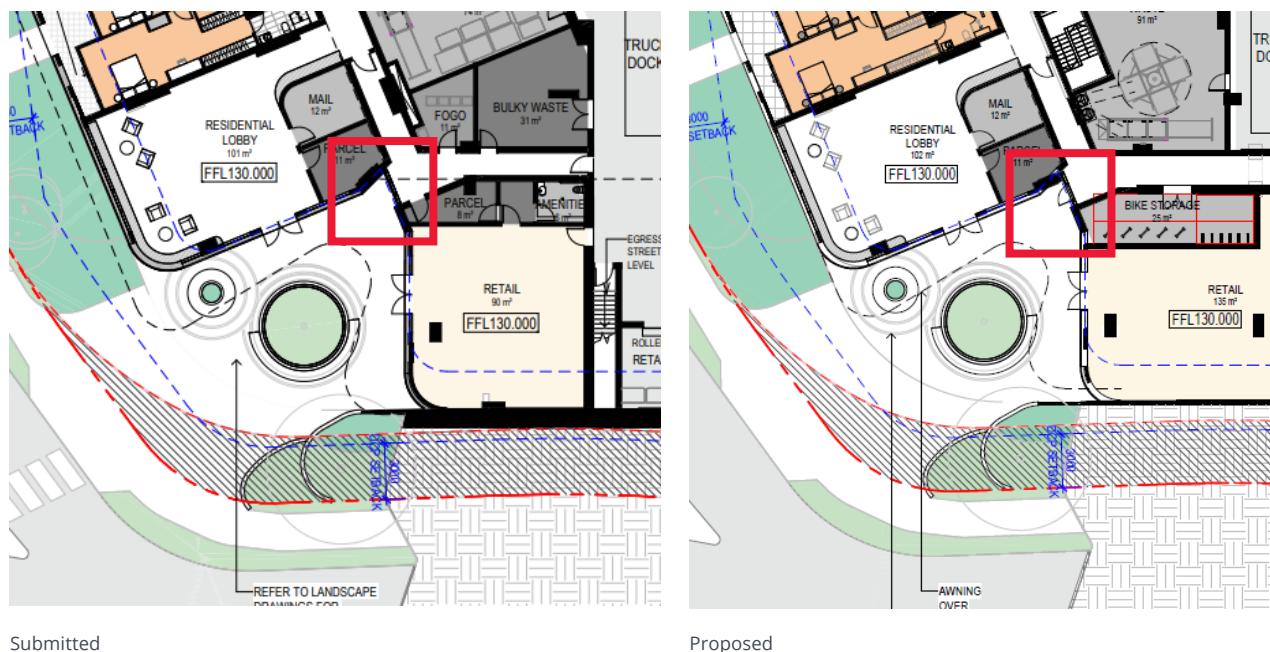


Figure 8 Comparison of submitted and proposed entry

Source: Studio SC

4.11 Affordable Housing

In response to recent updates to HDA criteria and in order to ensure the affordable housing public benefit associated with the proposal can be secured permanently rather than for a temporary period, it is proposed to switch the proposed affordable housing offer from a temporary period to in perpetuity.

Given the nature of affordable housing in perpetuity has a much greater impact on project feasibility than affordable housing provided temporarily, the percentage of affordable housing provided must reduce from 15%. Accordingly, 3% of residential GFA is proposed as affordable housing in perpetuity, as this is broadly equivalent from a feasibility perspective.

3% as a percentage is also commensurate with the base percentage required across generally across NSW TOD Tier 1 precincts, and higher than the 2% requirement across Tier 2 precincts. Whilst not located within a mapped Tier 1 or Tier 2 TOD precinct, given the project is effectively a TOD project located less than 200m from Castle Hill Metro Station, and the equivalence from a feasibility perspective of 3% in perpetuity compared to 15% for 15 years, the proposed percentage is considered appropriate.

Overall, there is a significant planning benefit by ensuring affordable housing is provided in perpetuity, guaranteeing the long term provision of high quality affordable housing in a highly accessible location.

Accordingly, nine (9) units across the Ground Floor, Level 1 and Level 2 will be for affordable housing, secured as affordable housing permanently.

A breakdown of the proposed affordable housing including a proportionate common area calculation is provided in the affordable housing drawing plan in AD-DA80_561.

Refer to **Figure 9** below for the floorplan of the proposed affordable housing.



Figure 9 *Proposed affordable housing*

Source: Studio SC

4.12 Unit Mix and Yield

The unit mix and yield have been amended as part of ongoing design amendments and revisions to the floor plate. A comparison of the proposed and amended unit mix is provided in **Table 4** below.

Table 4 *Unit mix*

	Originally proposed		Amended	
	Count	Mix Percentage	Count	Mix Percentage
1 bedroom	90	24%	141	36%
2 bedroom	194	52%	191	49%
3 bedroom	83	22%	56	14%
4 bedroom	4	1%	4	1%
Total	371	100%	392	100%

4.12.1 Accessible Apartment Changes

Following further design refinement, the adaptable and liveable apartment mix has been updated. Refer to **Table 5**.

Table 5 Accessible mix changes

Basement Level	Originally Proposed	Amended
Adaptable	19	28
Liveable	77	115

4.13 FSR Reduction

The GFA and FSR of the development have reduced as a result of the design changes. See the comparison table below at **Table 6**.

Table 6 Revised GFA Calculations

GFA Calculation	Originally Proposed	Amended
Overall Residential	36,067m ²	34,735m ²
Market	30,659m ²	33,668m ²
Affordable Housing	5,409	1,067m ² *
Retail	112m ²	166m ²
Total GFA	36,067m ²	34,902m ²
FSR	11.55:1	10.98:1

*The reduction in affordable housing GFA is a result of switching the offer from 15% for 15 years to 3% in perpetuity.

4.14 Façade Amendments

The façade colour palette has been revised to incorporate a natural, earthy range of tones that responds to and integrates with the surrounding local context. Refer to a comparison of the submitted colour palette and the proposed palette in **Figure 10**.

The primary framing has been revised from a continuous vertical pattern to structured grid, improving the look and feel of the buildings by breaking up the extent of the building and providing visual relief through the tower. Additional façade elements have been introduced to provide greater depth and visual interest, while the infill pattern has been updated to create a more unified design and reduce the perceived bulk of the tower. The façade has also been refined to incorporate shading and recessed elements that improve solar performance. Refer to **Figure 11** and **Figure 13** below.

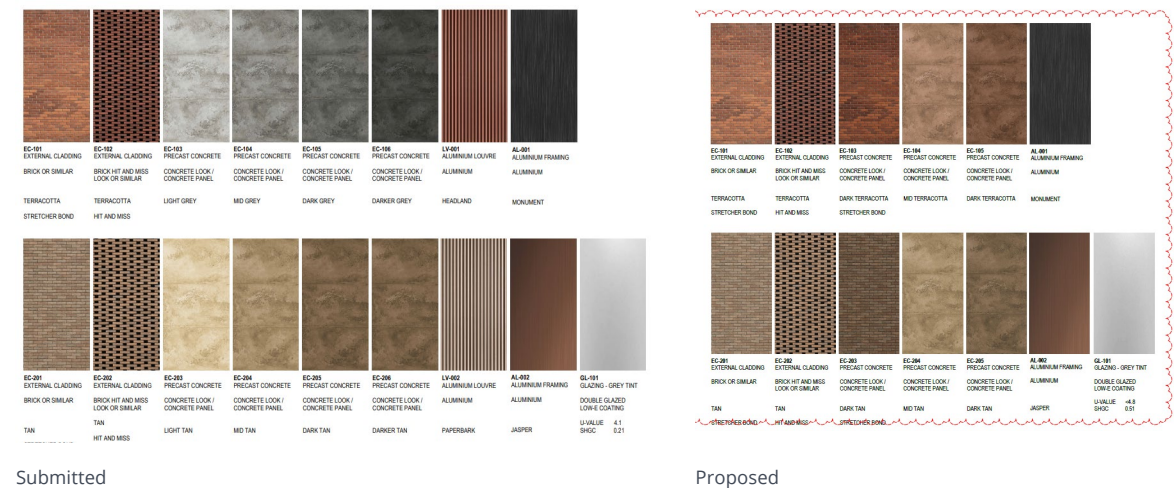


Figure 10 Comparison of submitted and proposed external finishes and materials



Figure 11 *Render of amended facade*

Source: Studio SC

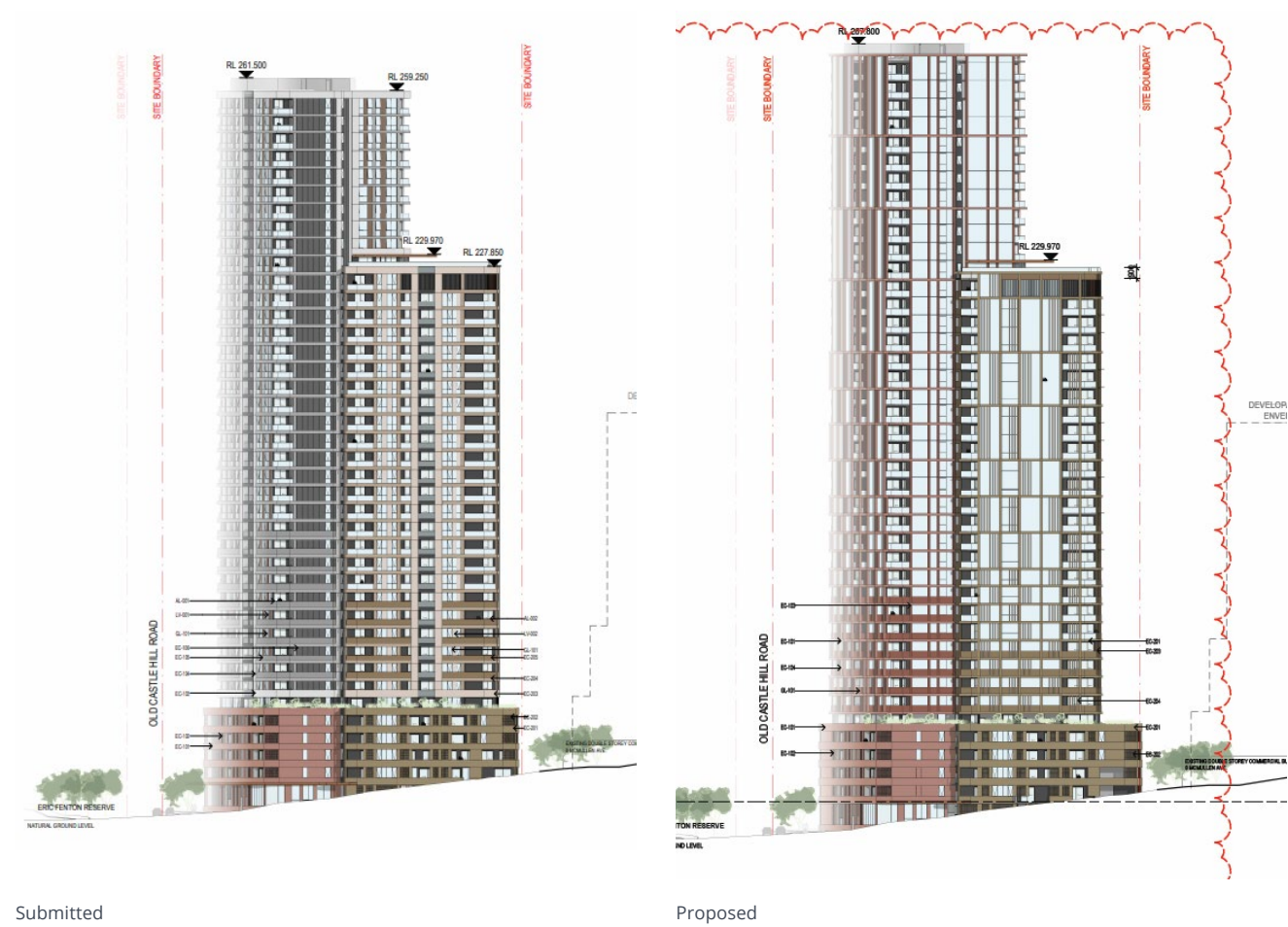


Figure 12 Comparison of submitted and proposed façade (southern elevation)

Source: Studio SC

4.15 Landscaping Amendments

In response to feedback from the SDRP, the total deep soil area has been increased to achieve the ADG criteria. To facilitate this, the building envelope has been setback further from the northern and eastern boundaries, creating additional opportunities for deep soil planting. In particular, deep soil zones along these boundaries have been expanded and revised to provide a minimum width of 6 metres, and the ADG deep soil percentage of 15%. Refer to **Figure 13**, with the area of increased deep soil outlined indicatively in blue.



Figure 13 Comparison of submitted and proposed façade (southern elevation)

Source: Studio SC

4.16 Updated Mitigation Measures

4.16.1 Wind

The Pedestrian Wind Study has been revised to include updated mitigation measures, which include the following:

- **Ground:** Extended awning to 3m depth at the corner of Old Castle Hill Road and Garthowen Crescent.
- **Level 30 Communal Terrace:** The height of perimeter screening increased to 1.9 m above FFL, and the awning was maintained to be at least 3 m to increase wind capture.
- **Southwest Corner Balconies (Levels 30 and above):** A full-height impermeable screen has been included along the shorter aspect to mitigate corner wind acceleration effects. The latest drawings indicate that the screening has been extended further through the introduction of additional louvres. This is expected to further improve local wind conditions.

These mitigation measures have been incorporated into the amended design, as discussed at **Section 4.1**.

5.0 Response to Submissions

The Detailed Summary of Submissions Tables in the **Appendix B** provides a comprehensive overview of the submissions raised by government agencies, key stakeholders, organisations, and the community. It includes detailed responses to each of the issues raised during the consultation period.

6.0 Further Assessment of Amended Project

6.1 Statutory Assessment

Since the SSDA lodgement, there have been no relevant changes to the strategic or statutory context that would affect the site or the proposed development. As such, no further detailed assessment is required based on these changes.

However, in response to THSC-31 within the Detailed Response Table in **Appendix B, Table 7** provides a detailed assessment against the requirements of Chapter 4 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP).

6.1.1 Chapter 4 Housing SEPP (2021)

Table 7 *Schedule 9 Design principles for residential apartment development*

Legislation	Assessment
1 Context and neighbourhood character	- The site is located within the Castle Hill Strategic Centre, an evolving precinct transitioning from low-density housing to higher-density residential living. The proposed development responds to this changing context while respecting the surrounding lower-density character through careful building placement and considered design. - The proposal incorporates curved building edges to ensure compatibility with both the existing and future character of the area. - The design includes varied setbacks to ensure compatibility with surrounding development and to deliver improved public-domain outcomes. - The proposed material palette is varied and has been selected to blend with the wider built form of Castle Hill, with red brick and brown tones used to reflect the established character of the area.
2 Built form and scale	- The proposal concentrates density close to Castle Hill Station to support the use of public transport. - A six-storey podium provides a consistent street wall and a pedestrian-scaled interface, with a partitioned slender tower form above to reduce perceived bulk. - The tower form is sculpted and tapered to reduce overshadowing of Arthur Whitling Park and nearby public spaces. The scheme also targets strong residential amenity outcomes, including solar access and cross-ventilation performance consistent with the ADG. - The towers split and step to soften the skyline profile, improve solar access and maintain view corridors to key public spaces - Podium and tower datums align with surrounding approvals and emerging built form along Old Castle Hill Road and McMullen Avenue. - Curved corners and a strong vertical expression break down the façade and improve legibility at street level. - Deep soil zones, terraced planting and active frontages integrate the podium with the public domain and support a walkable precinct.
3 Density	- The site is located within the Castle Hill strategic centre, which is an evolving precinct transitioning from currently low-density residential to high-density residential living options. The proposed development responds to this changing typology whilst respecting the lower density character surrounding the site through the careful placement of built form across the site and building design choices. - The proposal concentrates density close to Castle Hill Station to support public transport use and reduce car dependency.

4 Sustainability

- The proposal has sought to integrate principles of Ecologically Sustainable Development (ESD) throughout the development. This includes achieving a 5 Star Green Buildings rating, as well as numerous initiatives to ensure the efficient use of resources, including gas, electricity and water.
- The proposed development supports sustainability objectives by embedding sustainability principles throughout the design, including the retention of deep soil zones to support canopy planting, contributing to improved urban cooling, biodiversity, and urban amenity.

5 Landscape

- Landscaping provision: The proposal provides a generous amount of landscaping to support a high-amenity and liveable development outcome.
- Deep soil areas: Large deep-soil zones are located on both sides of the site, compliant with the deep soil requirements of the ADG.
- Tree retention: Existing trees along McMullen Street and Old Castle Hill Road are retained to preserve the established landscape character.
- Planting typologies: A variety of planting typologies has been layered to create adaptable landscape buffers that enhance amenity and improve privacy.
- Streetscape response: A garden-like streetscape has been designed to integrate with the surrounding landscape quality.
- Native species: Native species have been incorporated to strengthen habitat connectivity and support biodiversity.
- Total landscaped area: A total of 1,955 m² of landscaped area is provided, offering a generous and high-quality environment for residents and the public to enjoy

6 Amenity

The proposal results in the following amenity outcomes:

- 73% of apartments achieve solar access for at least 2 hours, exceeding the 70% requirement within the ADG.
- No more than 15% of apartments are solely south-facing, maximising the sharing of solar amenity across the development well beyond the ADG guidance.
- 60% of apartments are naturally cross-ventilated, consistent with ADG guidance.

7 Safety

- The proposal incorporates Crime Prevention Through Environmental Design principles, including CCTV coverage, appropriate lighting and clear signage, to enhance safety, amenity and perceptions of security.
- The private and communal open spaces have been designed to ensure they are safe and secure, with appropriate security measures integrated into the layout and operation of these areas.
- The development also provides clear sightlines to apartment doors within corridors, maximises access to natural light and ensures that hallways will be well illuminated at night to support visibility and passive surveillance.

8 Housing diversity and social interaction

- The proposal will deliver 392 apartments, including 9 affordable housing units in perpetuity, within an established strategic centre
- The proposal includes a range of 1 to 4 bedroom apartments to cater to different household needs.

9 Aesthetics

- The proposal incorporates a wide range of materials and colours that reflect the original character of Castle Hill, with brick and brown tones used as the primary elements.
- The proposal adopts a modern architectural approach that also aligns with the future direction of Castle Hill as it transitions toward higher-density residential and commercial development.

6.2 Bulk and Scale

The proposed changes reduce the proposal's building bulk and scale, resulting in a more slender tower form and an improved urban design outcome, directly in response to feedback received from the SDRP and DPHI. While the tower has increased in height by two storeys, this is principally to the high rise 'pencil' element, which is extremely slender at approx. 576m² GFA floor plates and only makes up a small portion of the overall building. The midrise component of the tower, which makes up the majority of the tower, has been significantly reduced in width, creating a slimmer building profile and significantly reducing the perceived bulk of the development, especially from street level.

Overall, these changes represent an improved design outcome for the site, as the reduced floor plate lessens the visual scale and massing of the buildings while enhancing amenity outcomes for future residents and the surrounding area.

6.2.1 Height

The slender high-rise portion of the tower has been amended to increase by two storeys, with its maximum height rising from the originally proposed RL 261.500 (131.1 m) to RL 267.800 (137.4 m), representing an overall increase of 6.3m. As a result, the tower height has increased from 40 to 42 storeys.

The minor increase in height will not be overly perceptible compared to the 40 storey proposal as lodged, generally appearing of similar scale, and from a planning hierarchy perspective, it will remain to sit comfortably in its context in the Castle Hill skyline, and in the context of the hierarchy of heights across key centres in the Hills Shire, as shown **Figure 14** below, which shows the proposal in the existing and future context.

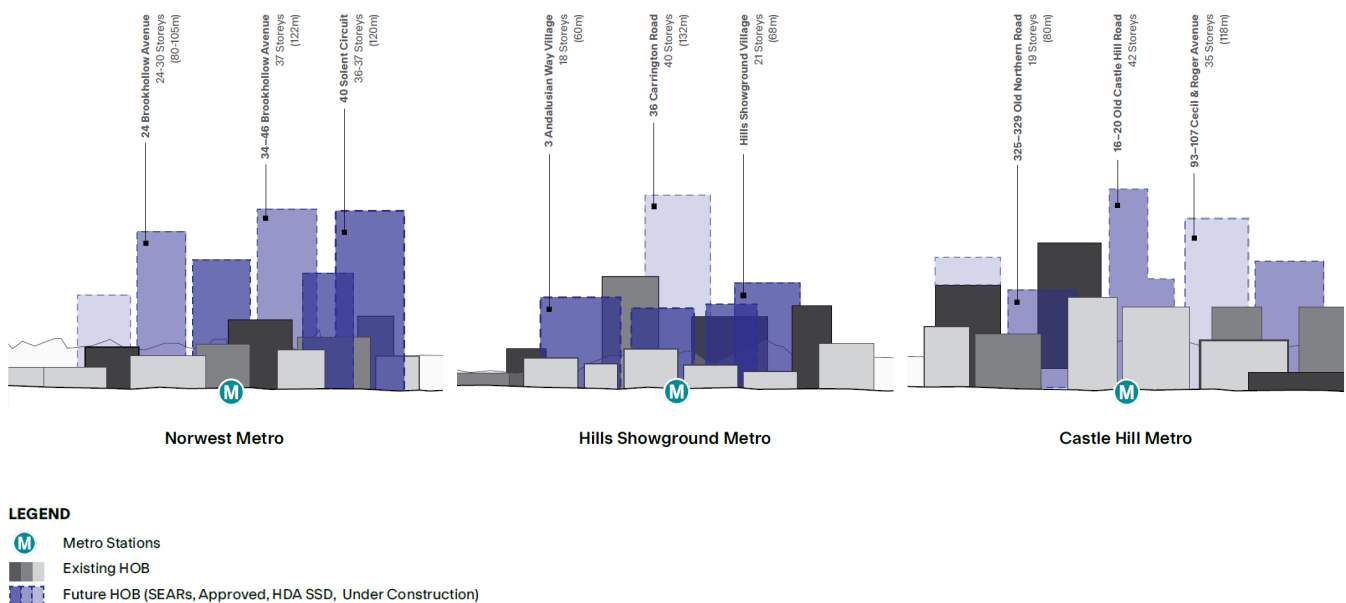


Figure 14 *Proposed development in existing and future context of locality*

Source: Studio SC

Notwithstanding the minor increase in height, the revised tower form will not result in any unacceptable impacts. Rather, the more slender tower profile will improve solar access outcomes and reduce overshadowing impacts on surrounding development, particularly Arthur Whitling Park (as discussed further below). As such, the proposal achieves the overarching design objective of reducing the perceived bulk and scale of the development. The height and scale strategy remains as assessed in the EIS with a focus on reducing the width of the tower form. Refer to **Figure 15** below.



Figure 15 Photomontage renders of the amended development as viewed from key locations within the locality

Source: Studio SC

6.2.2 Overshadowing

The massing of the amended building has been designed to minimise overshadowing to surrounding open space, such as Arthur Whitling Park and neighbouring properties, whilst balancing a need to deliver crucial housing density in a central and accessible area. The Design Response provided to DPHI at **Appendix O** includes shadow diagrams, which show shadow analysis at hourly intervals between 9am and 3pm for the winter solstice. The proposed overshadowing impacts during the winter solstice are included at **Figure 16**, demonstrating the worst-case scenario of overshadowing impacts.



03 OVERSHADOWING - 21 JUNE - 1100.



04 OVERSHADOWING - 21 JUNE - 1200.



05 OVERSHADOWING - 21 JUNE - 1300.



06 OVERSHADOWING - 21 JUNE - 1400.

LEGEND

- Arthur Whitting Park
- Overshadow by Current Scheme (HDA)
- Overshadow Difference between Previous and Current Scheme (HDA)
- Overshadow to Arthur Whitting Park

Figure 16 *Overshadowing analysis – winter solstice*

Source: Studio SC

Figure 16 demonstrates that the additional proposed height has no change in impact to Arthur Whitting Park, given the shadow caused by any changes at the top of the building is beyond the park itself. By amending the width of the building and making the overall form more slender, the impact on Arthur Whitting Park is reduced in some areas, principally in the early morning. Therefore, it is considered that the amendments proposed in this RTS are generally in accordance, and in some areas, an improvement upon the originally exhibited scheme.

6.3 Residential Amenity

The built form changes have resulted in minor adjustments to the amenity outcomes. The only material impact is a 2% decrease in the proportion of apartments receiving a minimum of two hours of solar access during mid-winter. Despite this reduction, the revised proposal maintains compliance with solar access and cross ventilation as per the requirements of the ADG.

Refer to the comparison in **Table 8**.

In relation to the 9 affordable apartments being offered in perpetuity, approximately 77% of these apartments achieve 2 hours of solar, and 66% achieve cross ventilation, meaning that they are compliant with the requirements of the ADG, consistent with the remainder of apartments in the building.

Table 8 *Revised Residential Amenity*

	Originally Proposed Count	Originally Proposed Percentage	Amended Count	Percentage
Solar Access	271	73%	278	71%
Cross Ventilation (first 9 floors)	81	60%	80	60%

6.4 Wind

To address the findings of the originally submitted Wind Report, RWDI was engaged to undertake additional wind mitigation testing in **Appendix H**.

The updated assessment demonstrated that the proposed mitigation measures successfully resolved all previously identified wind safety exceedances. Further, the incorporation of densely planted landscaping within the Level 30 terrace planter areas is expected to improve wind comfort conditions to achieve a standing-use classification.

RWDI has subsequently reviewed the Revised Architectural Drawings at **Appendix C** and noted that the southern portion of the tower has been set back, resulting in a reduction to the building envelope and the extent of the Level 30 communal terrace. Based on this design amendment RWDI has advised that these design changes do not alter the conclusions of the updated assessment or the recommended mitigation measures.

7.0 Updated Project Justification

This section provides an updated justification for and evaluation of the project as a whole, incorporating any relevant issues raised in submissions and the applicant's response to these issues.

Any design changes or assessments undertaken are in response to issues raised in submissions and have not increased the impact of development. The design changes have adequately responded to the issues raised and remain generally consistent with that of the exhibited EIS. As such, the justification for the project, as previously outlined in the EIS, is reiterated and strengthened through the presented responses, which comprise meaningful amendments to the proposal.

Furthermore, the proposal as set out in this Submissions and Amendment Report reinforces the findings of the considerations of alternatives set out in the EIS. In particular, the options of 'Do Nothing' (Option 1), 'Use of the site for an alternative purpose' (Option 2), and 'Residential Development without 3% Affordable Housing' (Option 3B) are not feasible when consideration is given to the objectives of the development as set out in Section 1.3 of the EIS and the further assessment provided in this report.

7.1 Consistency with the Strategic Context

The strategic context for the proposal has been addressed in Section 2.3 and Section 5.0 of the EIS, and the proposed amended development is considered consistent with the relevant strategic planning framework. The proposal (as amended) aligns with the National Housing Accord by delivering a greater amount and choice of new homes, including affordable housing, in a well-located area within the existing urban footprint that is highly accessible to public transport.

The proposed development (as amended) continues to support key strategic planning moves relating to the following themes:

- **Responding to housing need:** The proposal makes a significant contribution to housing availability, affordability and diversity by providing approximately 392 new dwellings, including 9 affordable dwellings managed by a registered community housing in perpetuity. The site is a key strategic location within 250m of Castle Hill Metro Station, supporting transit-oriented development.
- **Delivering a healthy, resilient and socially connected community:** Apartments are co-located with retail uses, residential amenities and publicly accessible open spaces. The design includes landscaping and generous communal spaces, encouraging social cohesion and a strong sense of community.
- **Supporting local economic activity:** The proposal will activate the ground plane through retail tenancies and contribute to the vitality of the Castle Hill centre. Future residents are expected to support surrounding restaurants, cafés and shops, while the development itself will generate employment opportunities during construction and ongoing building operations.

7.2 Consistency with the Statutory Requirements

The relevant statutory requirements have been discussed in Section 6.0 of the EIS and assessed in Appendix C of the EIS.

Specifically, this EIS has addressed all of the matters specified in the issued SEARs dated 10 June 2025 (refer to Appendix A of the EIS) and Sections 190 and 192 of the EP&A Regulation (refer to Appendix C of the EIS).

The proposal (as amended) does not trigger the need for an EPBC Act approval and is consistent with the principal planning controls of The Hills LEP 2019, as demonstrated in Section 6.0 of the EIS. The amended proposal is consistent with the relevant Objects of the EP&A Act, as it:

- Delivers approximately 392 apartments, including 9 affordable dwellings in perpetuity, to accommodate the growing population of Greater Sydney and improve housing supply and affordability.
- Promotes the orderly and economic use of land by redeveloping an underutilised site within an existing urban area, close to high-frequency public transport.
- Embeds ecologically sustainable development (ESD) principles through design and operational initiatives.

- Will not result in adverse impacts to threatened species or ecological communities, as confirmed through the obtainment of a BDAR Waiver.
- Generates employment opportunities during both construction and operational phases.
- Has engaged with the NSW State Design Review Panel to achieve high-quality design and amenity outcomes.
- Incorporates good design and amenity of the built environment, as demonstrated in the assessment section of this Report.
- Does not adversely impact Aboriginal cultural heritage. Designing with Country and Connecting with Country principles have informed the proposal to ensure cultural values are respected and celebrated.
- Has involved consultation and feedback with all relevant stakeholders (refer to Section 7.0 of the EIS).
- Is suitable for the proposed development and is in the public interest.

7.2.1 Principles of Ecologically Sustainable Development

Section 193 of the EP&A Regulation outlines four (4) principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation, pricing and incentive mechanisms. An analysis of these principles is provided in the following sections.

7.2.2 Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This Submissions and Amendment Report has not identified any serious threat of irreversible damage to the environment and therefore, the precautionary principle is not relevant to the project. The proposal (as amended) will deliver a high standard of ESD outcomes and initiatives at the site, as described above (and in the EIS).

7.2.3 Intergenerational Equity

Intergenerational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal (as amended) has been designed to benefit both the existing and future generations by:

- Use of sustainable materials with low embodied emissions.
- Improving the biodiversity by incorporating native vegetation for landscaping.
- Incorporating water-efficient fixtures and systems to reduce water consumption and protect future water resources.
- Educating employees and occupants about sustainable practices and the importance of responsible resource use.

The proposal (as amended) has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications, such as waste disposal, would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in the EIS and technical reports.

7.2.4 Conservation of Biological Diversity and Ecological Integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal (as amended) would not have any significant effect on the biological diversity and ecological integrity of the study area.

7.2.5 Improved Valuation, Pricing and Incentive Mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

7.3 Likely Impacts of Development

Having regard to the natural environment, built environment and economic and social impacts of the amended proposed development, the likely impacts of development are considered acceptable as outlined in the following sections.

Additionally, the proposed mitigation measures detailed within Section 8.0 and Appendix E of the EIS outlined mitigation and management measures that will minimise the impact of the proposed development.

7.3.1 Biophysical

The proposed development (as amended) has demonstrated that the proposal adopts appropriate management strategies and will generate limited environmental impacts, due to the proposed mitigation measures and the considerate design of the development.

All potential environmental impacts are thoroughly addressed in the EIS and **Appendix B** in response to the public submissions.

7.3.2 Social and Economic

The amended proposal's social and economic impacts include:

- It will facilitate the delivery of a diverse housing within a desirable location, close to existing transport options and amenities, including Castle Hill Metro Station.
- It will enable the delivery of much-needed housing supply, contributing to NSW housing targets and addressing the recognised shortage of housing across Greater Sydney, which has intensified the current housing affordability challenge.
- It will support the provision of direct and indirect jobs on site during the construction stage.
- It will achieve a high-quality built form outcome, accompanied by significant public benefits through the delivery of affordable housing for 15 years in perpetuity.
- It will revitalise a currently underutilised site with a landmark residential development, catalysing growth in the Castle Hill centre and improving the visual amenity of the area.

7.4 Suitability of the Site

Having regard to the characteristics of the site and its immediate surrounding context, the proposed development (as amended) is suitable for the site for the following reasons:

- The site is located within the R1 General Residential zone.
- The proposal will allow for the development of a currently underutilised site with regard to its current density and strategic location for increased housing supply.
- The site is located within the Castle Hill strategic centre, which is an evolving precinct transitioning from currently low-density residential to high-density residential living options. The proposed development responds to this changing typology whilst respecting the lower density character surrounding the site through the careful placement of built form across the site and building design choices.
- All necessary utility services are readily available to the proposal and are capable of accommodating any additional demand that may be associated with the residential uplift proposed for the site.
- The size and dimensions of the site are suitable for the scale of the proposed development; and
- The site is proximate to a range of high-frequency public transport options, including the Castle Hill Metro Station.

7.5 Public Interest

Having regard to the public interest, the proposed development (as amended) is in the public interest for the following reasons:

- It will increase the supply and choice of housing in a highly accessible location. The proposal presents an important opportunity to revitalise the site in accordance with the strategic vision for Castle Hill.
- It will provide a considerably diverse housing supply in the form of affordable housing units proximate to public transport options and employment opportunities within the Castle Hill town centre. This directly contributes to the achievement of diverse housing in The Hills LGA in line with the National Housing Accord.
- Direct employment opportunities will be created during the construction and operation of the proposal.
- The development is consistent with planning controls under The Hills LEP and Housing SEPP, and implements the objectives of the ADG. The proposed rezoning addresses the FSR variation.
- The proposed development provides improved amenities for the surrounding area by revitalising a currently underutilised property with public domain improvements and increased housing supply; and
- The delivery of affordable housing will ensure that residents can access housing that is affordable and in close proximity to jobs, services and education.

8.0 Conclusion

As set out in this Submissions and Amendment Report, the Applicant has reviewed each of the submissions made by members of the general public and State and local Government agencies. In response to issues raised in these submissions, as well as matters identified by the Department, the Applicant has undertaken further environmental assessment and provided clarification regarding the scope of the proposed development that is the subject of this planning application. A number of changes to the proposed development have been made in the course of responding to matters raised in the submissions, as well as a result of further project design development. This Submissions and Amendment Report has set out these matters as required under section 59(2) of the EP&A Regulation and in accordance with the DPHI's *State Significant Development Guidelines, including Appendix C – Preparing a Submissions Report and Appendix D- Preparing and Amendment Report*



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