



THE HILLS
Sydney's Garden Shire

THE HILLS SHIRE COUNCIL

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26 August 2025

Mr Tom Piovesan
Department of Planning and Environment
Uploaded to Planning Portal

Our Ref: 47/2025/PRE
Your Ref: PAE-89374222
SSD-80229956

Dear Mr Piovesan

Residential development with in-fill affordable housing
16-30 Dawes Avenue, 4-8 Hughes Ave and 2-10 Cadman Crescent, Castle Hill

The following comments are provided for consideration of the Department in the assessment of the subject application. Due to the limited exhibition period, these comments highlight only high-level issues based on a limited review by Council staff.

1. Development Comments:

a. *Height*

The subject site is mapped as containing a maximum building height of 21m pursuant to Clause 4.3 of LEP 2019. Subclause 3 of Clause 16 of the SEPP (Housing) 2021 permits a bonus height. The proposal seeks a variation to the maximum height permitted under the bonus provisions of Subclause 3 of Clause 16 of the SEPP (Housing) 2021.

The Clause 4.6 written submission states that the proposal meets the objectives of the development standard notwithstanding its non-compliance with the standard and considers that the proposal would meet the objectives of the height standard under Clause 4.3 of the LEP. Objective b) of the height standard requires the impact of overshadowing, visual impact on adjoining properties and open space areas to be *minimised*. The shadow diagrams submitted indicate that there would be further overshadowing impacts to existing and

potential future adjoining southern properties and open space areas. The proposal is also required to demonstrate how the bulk and scale of the additional two storeys would minimise the visual impact and loss of privacy on adjoining properties. The further departure from the height standard should not be supported until the application can demonstrate that objective b) can be achieved.

b. *Floor Space Ratio*

The subject application proposes 13.6% of the GFA to be used as affordable housing pursuant to the SEPP and is seeking to utilise the additional FSR pursuant to Clause 16 of the SEPP which permits a 30% bonus of maximum permissible FSR for the land under the relevant environmental planning instrument. The maximum permissible FSR under Clause 9.7 of the Hills LEP 2019 (LEP) is 2.3:1 subject to all provisions including unit mix, unit sizes and car parking requirements being met. The application must demonstrate that all the provisions under Clause 9.7 are met to ensure the incentive FSR can be applied. Otherwise, a bonus can only be applied to the maximum permissible FSR under Clause 4.4 of the LEP is 1.6:1.

c. *Solar Access*

The submitted documentation indicates that only 68% of units will receive 2 hours solar access between 9am – 3pm during the winter solstice. This does not achieve the minimum solar access design criteria under the Apartment Design Guide. The proposal should be amended to fully comply with the minimum provisions under the Apartment Design Guide.

2. Traffic Comments:

- a. The SSDA proposes a total of 631 on-site parking spaces across three basement levels, including 163 bicycle spaces and 11 motorcycle spaces. This represents a net increase of 147 spaces above the approved 672/2023/JP scheme, or 79 spaces above the modified scheme under 672/2023/JP/A, which is currently seeking approval. The proposed parking provision is significantly above the minimum SEPP requirements but close to the DCP requirements.
- b. The proposed vehicular access arrangements are consistent with the approved schemes, via separate basement car park and loading bay driveways, both off Cadman Crescent. As previously imposed, the service driveway will be restricted to right-in and left-out movements only, until the opposite side of Cadman Crescent is widened.
- c. The SSDA is expected to generate 68 AM peak hour trips and 54 PM peak hour trips, representing an increase of 15 and 12 trips (or approximately 30%) respectively, compared to the approved 53 AM and 42 PM peak hour trips. While the additional trips may not seem significant in isolation, similar developments in the area subject to the SEPP uplift could cumulatively place stress on existing and future transport infrastructure. The SEPP incentive assumes that developments near public transport terminals will result in minimal traffic impact, with a shift toward public transport. To support this, a Green Travel Plan and Travel Demand Management scheme must be prepared and implemented to reduce private car reliance and encourage active and public transport use.
- d. The site is subject to Contribution Plan CP19 – Showground Station Precinct. The SSDA must ensure that adequate contributions are collected from the proponent to support the delivery of planned transport infrastructure in the area, such as the proposed roundabout at the intersection of Middleton Avenue and Fishburn Crescent.

2. Contributions Comments:

A contribution condition cannot be provided until a schedule of the unit mix for each building and Stage is provided.

3. Environmental Health Comments:

Environmental Health recommend that the proposal be supported for approval, subject to conditions requiring the implementation of all mitigation measures and design recommendations outlined in the submitted wind and acoustic assessments. These measures should be incorporated into the final construction plans, installed during the construction phase, and verified as completed prior to the issue of an Occupation Certificate. Ongoing maintenance of these measures should also be ensured for the continued performance and compliance of the development.

Acoustic Assessment

Koikas Acoustics conducted an acoustic assessment of the proposed development to evaluate compliance with typical SEARs requirements and internal sound insulation standards for apartments. Based on the architectural drawings and project-specific information, the report concludes that cumulative noise emissions from mechanical systems, including air conditioning condensers and building fans, can be suitably controlled if recommended noise control measures—such as acoustic duct lining, barriers, and the use of Night Quiet Modes between 10 pm and 8 am—are implemented. Additionally, the internal partition systems comply with appropriate sound insulation standards. Overall, Koikas Acoustics is satisfied that the development, as designed, will meet the necessary acoustic requirements. As part of development consent, it is recommended that conditions are placed in the development consent to ensure that all mitigation and operational measures outlined in the acoustic report are fully implemented. This includes requiring that noise control measures (e.g. acoustic ducting, barriers, Night Quiet Modes, and partition specifications) are clearly shown on construction plans prior to commencement, installed during construction, and independently verified prior to occupation. Further, ongoing conditions should be included to ensure that the development is operated in accordance with the acoustic report and that all soundproofing elements are properly maintained for the life of the development.

Contamination

Contamination status of the site was already considered during the original development approval under 672/2023/JP

4. Property Numbering Comments:

The majority of numbering remains the same as that within 672/2023/JP/A consent- with the only amendments being the addition of unit numbering for Levels 6 & 7.

The overall property addresses for this development are:

Building A – 26 Dawes Avenue, CASTLE HILL NSW 2154
Building B – 22 Dawes Avenue, CASTLE HILL NSW 2154
Building C – 18 Dawes Avenue, CASTLE HILL NSW 2154
Building D – 10 Cadman Crescent, CASTLE HILL NSW 2154
Building E – 8 Cadman Crescent, CASTLE HILL NSW 2154
Building F – 6 Hughes Avenue, CASTLE HILL NSW 2154
Building G – 4 Hughes Avenue, CASTLE HILL NSW 2154
Building H – 2 Hughes Avenue, CASTLE HILL NSW 2154

Property and Unit Numbering is marked up by Council's Land Information Team as per 'Numbering Plans' identifying unit numbers; and as follows:

<u>Level</u>	Buildin g A	Buildin g B	Buildin g C	Buildin g D	Buildin g E	Buildin g F	Buildin g G	Buildin g H
Basemen t 2								B201
Ground	G01 – G08	G09 – G13	G14 – G18	G19 – G23	G24 – G28	G29 – G34	G35 – G39	G40 – G44
One	101 – 109	110 – 115	116 – 121	122 – 127	128 – 134	135 – 141	142 – 147	148 – 152
Two	201 – 209	210 – 215	216 – 221	222 – 227	228 – 234	235 – 241	242 – 247	248 – 252
Three	301 – 309	310 – 315	316 – 321	322 – 327	328 – 334	335 – 341	342 – 347	348 – 352
Four	401 – 407	408 – 411	412 – 416	417 – 421	422 – 426	427 – 431	432 – 436	437 – 440
Five	501 – 507	508 – 511	512 – 516	517 – 521	522 – 526	527 – 531	532 – 536	537 – 540
Six	601 – 607	608 – 611	612 – 616	617 – 621	622 – 626	627 – 631	632 – 636	637 – 640
Seven	701 – 707	708 – 711	712 – 716	717 – 721	722 – 726	727 – 731	732 – 736	737 – 740

These addresses shall be used for all correspondence, legal property transactions and shown on the final registered Deposited Plan/Strata Plan lodged with Land Registry Services NSW as required.

Under no circumstances can unit numbering be repeated or skipped throughout the development regardless of the building name or number.

Approved numbers, unless otherwise approved by Council in writing, are to be displayed clearly on all door entrances including stairwells, lift, and lobby entry doors.

Signage

External directional signage is to be erected on site at driveway entry points, on buildings, stairwells, and lifts to ensure that all numbering signage throughout the complex is clear to assist emergency service providers locate a destination easily & quickly.

Mailboxes

A cluster Mailbox for each building is required outside the entrance of each major Lobby. Australia Post requires cluster mailboxes at the entrance to a building to be as close to the footpath or road as possible. Parking for Postal officer motorcycle/walk buggy is to be provided in a safe location that is viewable from foyer mailboxes to ensure the security of mail located on the vehicle. An intercom or doorbell is to be provided for each unit for the delivery of parcels.

Australia Post approval has been provided to Council by applicant signed off by Levi de Boehmler at Australia Post via email dated 14 August 2024 to applicant and on sent to Council on 9 September 2024. Locations are noted on plans DWG No DA-2000; Rev 6; Dated 23/06/2023.

The number of mailboxes to be provided is to be equal to the number of units plus one (1) for the proprietors of the development and be as per Australia Post size requirements. The proprietor's additional mailbox is to be located within the cluster located at **Building A - 26 Dawes Avenue, CASTLE HILL NSW 2154**.

Strata Developments

All approved developments that require subdivision under a Strata Plan, must submit a copy of the final strata plan to Council's Land Information Section *before it is registered* for the approval and allocation of final property and unit numbering. This applies regardless of whether the PCA is Council or not.

It is required that Lot numbers within the proposed strata plan are not duplicated, and all run sequentially within the same level, commencing from the lowest level upwards to the highest level within the development.

Please call 9843 0555 or email a copy of the final strata plan *before it is registered* at Land Registry Services NSW to council@thehills.nsw.gov.au for the approval of final Property and Unit numbering with corresponding Lot Numbers now required to be included within the registered Strata Administration sheet.

Under no circumstances is the Strata Plan to be lodged with Land Registry Services NSW before Council has approved the final strata plan Admin Sheet.

5. Waste Comments:

All conditions imposed under Development Consent 672/2023/JP apply to the subject application with the following amendment to condition 35 for an increase of bin numbers.

35. Construction of Waste Storage Areas

The waste storage area(s) must be designed and constructed in accordance with the following requirements. The central bin collection room must provide minimum storage facility for 20x 1100 litre garbage bins, 20 x 1100 litre recycling bins and, 38 x 240 litre food organics bins. The waste chute termination rooms must provide minimum storage facility for 1 x 2-1100 litre bin linear track system with compaction unit for garbage and 1 x 2-1100 litre bin linear track system for recycling (no compaction).

- The waste storage area(s) must be of adequate size to comfortably store and manoeuvre the total minimum required number of bins and associated waste infrastructure as specified above.
- The layout of the waste storage area(s) must ensure that each bin is easily accessible and manoeuvrable in and out of the areas with no manual handling of other bins. All internal walkways must be at least 1.5m wide.
- The walls of the waste storage area(s) must be constructed of brickwork.
- The floor of the waste storage area(s) must be constructed of concrete with a smooth non-slip finish, graded and drained to sewer. The rooms must not contain ramps and must be roofed (if located external to the building).
- The central bin collection room must have a waste servicing door, with a minimum clear floor width of 1.5m. The door must be located to allow the most direct access to the bins by collection contractors. Acceptable waste servicing doors are single or double swinging doors and roller doors (preferred). The waste servicing door must be supplied with a lock through Council's Waste Management Master Key System 'P3520'. See condition titled 'Installation of Master Key System to Waste Collection Room' for further details.
- The waste storage area(s) must have a resident access door, which allows wheelchair access for adaptable sites. Suitable resident access doors are single or double swinging doors. The resident access door must be separate to the waste servicing door. If a loading dock is proposed in the development the resident access door must be located to ensure that residents do not have access to the loading dock to gain access to the waste storage area(s).
- All doors of the waste storage area(s), when fully opened, must be flush with the outside wall(s) and must not block or obstruct car park aisles or footways. All doors must be able to be fixed in position when fully opened.
- The waste storage area(s) must be adequately ventilated (mechanically if located within the building footprint). Vented waste storage areas should not be connected to the same ventilation system supplying air to the units.
- The waste storage area(s) must be provided with a hose tap (hot and cold mixer), connected to a water supply. If the tap is located inside the waste storage area(s), it is not to conflict with the space designated for the placement of bins.
- The waste storage area(s) must be provided with internal lighting such as

automatic sensor lights.

- The maximum grade acceptable for moving bins for collection purposes is 5%.

- Under no circumstance is this grade to be exceeded. It is to allow the safe and efficient servicing of bins.
- The waste storage area(s) must have appropriate signage (Council approved designs), mounted in a visible location on internal walls and are to be permanently maintained by the Owners Corporation.
- Finishes and colours of the waste storage area(s) are to complement the design of the development.

Example Bin Measurements (mm)

240L: 735 (d) 580 (w) 1080 (h) 1100L: 1245 (d) 1370 (w) 1470 (h)

6. Landscaping Comments:

All conditions imposed under Development Consent 672/2023/JP apply to the subject application.

Engineering comments are outstanding at the time of this letter and will be forwarded under separate cover.

Should you wish to discuss the above please contact me on 9843 0334.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Cynthia Dugan', with a large, sweeping flourish at the end.

Cynthia Dugan

PRINCIPAL CO-ORDINATOR