



SCOPING REPORT -

REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENT (SEARS)

Construction of a part 14/15-storey residential flat building comprising approximately 115 dwellings, including a minimum 15% affordable housing component, with basement parking, building services, landscaping and associated site infrastructure works

51–57 Castle Street, Castle Hill NSW 2154

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1. Introduction

This Scoping Report has been prepared to support a request for the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of a State Significant Development Application (SSDA) and concurrent Planning Proposal for land at Nos. 51–57 Castle Street, Castle Hill NSW (the site). The report has been prepared by Planning Ingenuity on behalf of Dr James H. K. Kim (the Proponent) and is informed by preliminary concept architectural drawings and massing prepared by PBD Architects.

The proposal seeks approval for the construction of a part 14/15-storey residential flat building comprising approximately 115 dwellings, including a minimum 15% affordable housing component, supported by basement parking, building services, landscaping and associated site infrastructure works. The development is intended to deliver a high-quality, mid-rise residential outcome that responds to its suburban context while contributing to housing supply objectives within walking distance of Castle Hill Metro Station.

The site comprises a consolidated landholding within an established residential area of Castle Hill and is located within the Castle Hill Strategic Centre and the Sydney Metro Northwest station catchment areas. The land is currently zoned R3 Medium Density Residential under The Hills Local Environmental Plan 2019, with a maximum building height of 9 metres. Under the R3 zone, residential accommodation (including residential flat buildings) is a prohibited land use, and the proposed development cannot be facilitated under the existing local zoning framework. However, as the site is located within a low and mid rise housing area, cl174 of SEPP (Housing 2021) permits residential flat buildings in the R3 Medium Density Housing zone and there is no need for a planning proposal to alter the zoning.

The project was submitted to the NSW Housing Delivery Authority (HDA) as EOI 51795. Following HDA assessment, the Minister for Planning declared the project to be State Significant Development (SSD) under section 4.36(3) of the Environmental Planning and Assessment Act 1979. The Ministerial Planning Order has been published on the NSW Planning Portal (Ministerial Orders page). The HDA's advice noted that the SSD pathway is appropriate given the project's strategic location and scale, while also advising that merit assessment may result in development standards or dwelling yield lower than those outlined in the EOI.

The proposal seeks approval through a concurrent SSD and Planning Proposal pathway, with the Environmental Impact Statement (EIS) to incorporate the Planning Proposal documentation. The Planning Proposal will seek to amend the applicable development standards under The Hills Local Environmental Plan 2019, including the height of buildings development standard as the extent of variation is greater than 20%, noting that no FSR development standard is mapped for the site. It is requested that the SEARs include matters to be addressed in relation to the Planning Proposal, noting that the site's strategic merit and suitability for State-led assessment have already been considered through the HDA process.

As an approved HDA project, it is anticipated that industry-specific SEARs will be appropriate to guide preparation of the EIS. The SEARs should focus on core site-specific matters, including urban design quality, built form and height, residential amenity, traffic and access, infrastructure servicing and environmental performance. The site is not affected by complex environmental constraints, and the surrounding urban context supports a targeted and proportionate scope of assessment commensurate with the nature and scale of the proposal.

Supporting technical assessments informing the preparation of this Scoping Report to be expanded within the EIS will address the following key matters:

- Strategic and site specific merit;
- Urban design and built form (including ADG and design quality principles);
- Traffic, parking and access;
- Residential amenity, including acoustic performance and privacy;

- 
- Environmental sustainability (ESD) and building performance;
 - Stormwater management and infrastructure servicing;
 - Social and economic impacts; and
 - Contributions and infrastructure funding.

The EIS will assess the proposal against the relevant provisions of The Hills Local Environmental Plan 2019, applicable State Environmental Planning Policies (including the *State Environmental Planning Policy (Housing) 2021*), and other relevant State and local planning frameworks. It is expected that the EIS will demonstrate the suitability of the site for high-density residential development and the capacity for the proposal to deliver high-quality housing outcomes consistent with State housing, transport and sustainability objectives.

To support this SEARs request, this Scoping Report provides:

- A description of the proposed development (concept to be refined);
- A summary of the key applicable planning provisions (current and proposed);
- Justification for the site's suitability for high-density residential development; and
- A preliminary identification of key environmental and technical issues.

This report is accompanied by Concept architectural plans and massing study prepared by *PBD Architects* and Title and property information.

The purpose of this report is to assist the Department of Planning, Housing and Infrastructure in issuing proportionate, industry-specific SEARs for the proposed development. The structure of this report includes an overview of the site and context, proposed development description, applicable planning framework, site suitability assessment, preliminary identification of environmental issues, and conclusion.

2. Site Analysis and Context

2.1 THE SITE

The subject site is located on the south-western side of Castle Street, Castle Hill, and comprises a consolidated landholding at Nos. 51, 53, 55 and 57 Castle Street. The land is legally described as Lots 4–7 in DP 216875 and has a combined site area of approximately 3,233m². The site is located within The Hills Shire Local Government Area (LGA).

The site is currently occupied by a series of detached residential dwellings and associated outbuildings. The land generally slopes across the site, with a moderate fall typical of the surrounding Castle Hill locality. Existing driveway access is taken from Castle Street, and the site contains established landscaping and vegetation consistent with its residential use.

The site is zoned R3 Medium Density Residential under The Hills Local Environmental Plan 2019. Under the R3 zone, uses expressly permitted in the zone including dwelling-house and multi-dwelling housing (species) but the genus term of residential accommodation (including residential flat buildings) is a prohibited land use. In addition, the applicable development standards include a maximum building height of 9 metres, no specified floor space ratio, and a minimum lot size of 700m². These local controls do not facilitate the form or scale of development proposed and preclude the delivery of a residential flat building outcome.

The uplift in development potential is supported by the site's strategic location, proximity to high-capacity public transport, and its relationship to adjoining and nearby R4-zoned land within the Castle Hill Strategic Centre. The site is not affected by heritage listing or land reservation and is fully serviced by existing urban infrastructure, including water, sewer, drainage, electricity and telecommunications.

The surrounding area exhibits a clear transitional character, with established low and medium-density residential development giving way to increasingly intensive residential and mixed-use outcomes within and adjoining the Castle Hill Strategic Centre and the Castle Hill Metro Station precinct. Recent approvals and emerging development patterns within the station catchment demonstrate a shift toward residential flat buildings and higher-density housing forms, particularly in locations adjoining or influenced by Transport Oriented Development (TOD) zoning and the application of Low- and Mid-Rise Housing (LMR) provisions under the State Environmental Planning Policy (Housing) 2021. This evolving built form context is applicable around Castle Hill and includes the site which reflects a broader, deliberate transition in response to high-capacity public transport investment and State housing delivery objectives.

The site is located within approximately 650m walking distance of Castle Hill Metro Station and benefits from access to local bus services along Castle Street and surrounding arterial roads. The Castle Hill town centre, retail, commercial, community and recreational facilities are readily accessible, contributing to a highly connected urban environment supported by high-capacity public transport and established social infrastructure.

In summary, the site represents a strategic infill opportunity within the Castle Hill station catchment that is well suited to residential intensification. Residential flat buildings are permitted via c174 of the Housing SEPP on the site and this is reflective of the site's location, accessibility and surrounding planning context consistent with State and local objectives for housing delivery in proximity to public transport.

An aerial photograph of the site is provided at **Figure 1** below.

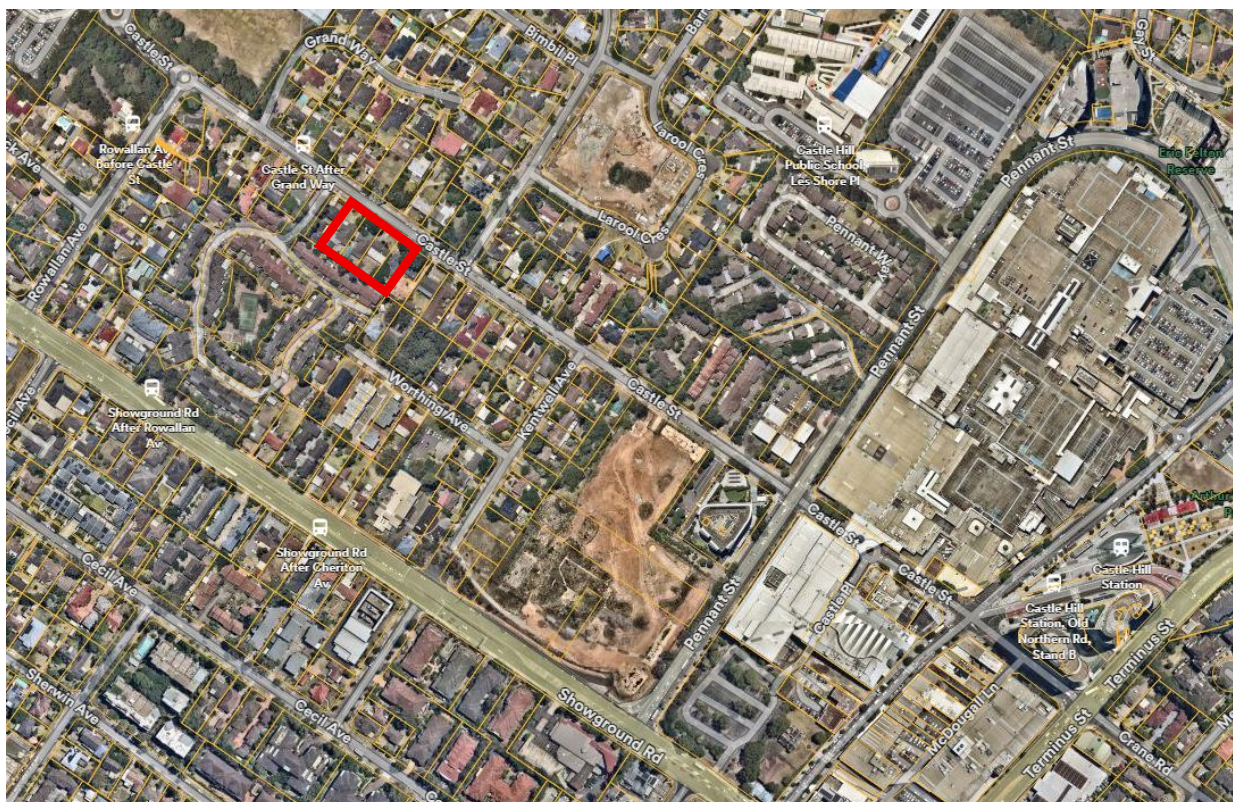


Figure 1 Aerial Photo of The Site (Bounded in red) (Source: NearMaps)

The site occupies a strategic infill location within the Castle Hill Strategic Centre catchment, with direct frontage to Castle Street, a local road under the care and control of The Hills Shire Council. Castle Street provides a direct connection to the broader Castle Hill road network, including Old Northern Road and surrounding collector roads, which facilitate access to the Castle Hill town centre, retail and commercial services, community facilities and public transport.

The site is located approximately 650 metres from Castle Hill Metro Station, placing it within a comfortable walking distance of high-capacity public transport and the Strategic Centre. This accessibility supports residential intensification and reinforces the site's role as part of a transition area between lower-density residential neighbourhoods and the higher-density residential and mixed-use development occurring closer to the station and town centre. Figures illustrating the site's street frontage, access arrangements and surrounding urban context are provided below.



Figure 2 The site as viewed from 57 Castle Street

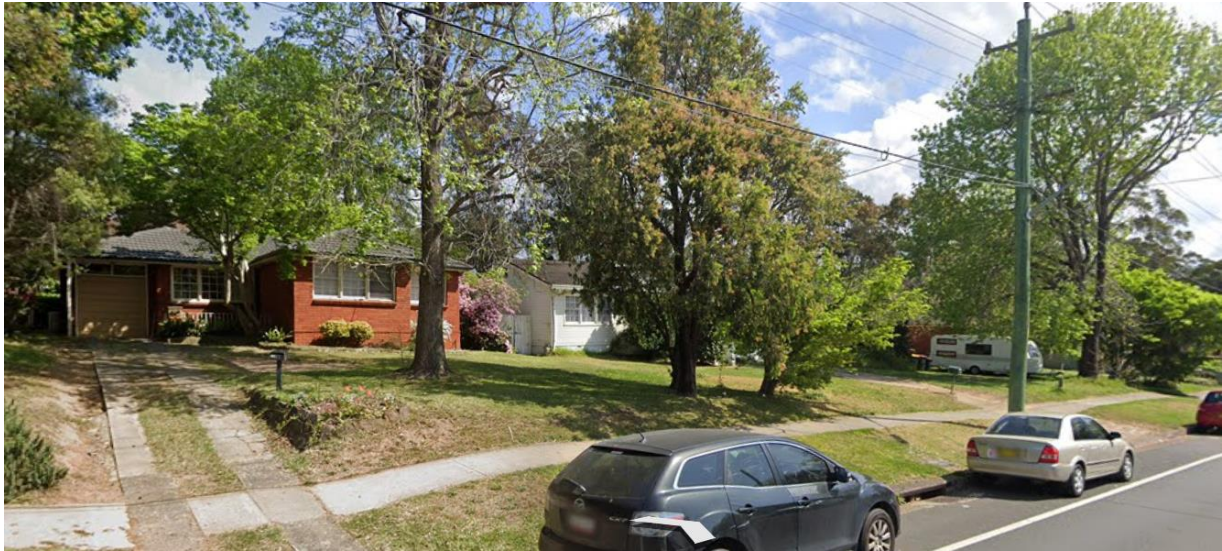


Figure 3 The site as viewed from 51 Castle Street

The site benefits from an extensive street frontage of approximately 71 metres to Castle Street, enabling a strong address to the public domain and opportunities to deliver a high-quality residential interface, generous setbacks, articulated building frontage and an enhanced streetscape outcome. The length of the frontage provides flexibility to accommodate well-defined pedestrian entries, landscape treatment and building articulation that responds to the scale of Castle Street and the surrounding residential context.

Vehicular access to the site is currently obtained from Castle Street and will be rationalised as part of the proposed development to balance safe and efficient vehicle movements with a pedestrian-focused public domain. Opportunities exist to consolidate vehicle access points and improve pedestrian connectivity along the street frontage, consistent with contemporary residential design principles and Council's public domain objectives.

The site is fully serviced by existing urban infrastructure, including water, sewer, stormwater drainage, electricity and telecommunications.

Given its location within the Castle Hill Strategic Centre catchment, proximity to Castle Hill Metro Station, established access to local services and infrastructure, and the opportunity for site consolidation, the subject land represents a highly suitable infill redevelopment opportunity. The proposal will contribute to the delivery of new housing, including affordable housing, in a location aligned with State housing delivery objectives and the NSW Housing Delivery Accord, supporting the efficient use of existing infrastructure and public transport investment.

2.2 SURROUNDING CONTEXT

The site is located within the Castle Hill Strategic Centre catchment and forms part of the broader Sydney Metro Northwest corridor, which has been the focus of significant public transport investment and evolving land-use outcomes. The surrounding locality is characterised by a diverse and transitional built form, comprising established low- and medium-density residential development, with increasing residential flat building and mixed-use density occurring closer to Castle Hill Metro Station and the town centre. The locality being mapped within the LMR area is set for a significant change in scale and density of development and therefore the character of the locality can be considered to be in transition from the existing lower density development which is discussed below.

To the south and west, the site adjoins established low-density residential development characterised by detached dwellings and landscaped streetscapes. This interface represents the lower-density edge of the broader Castle Hill precinct and informs the need for sensitive built form transitions, setbacks and articulation in the design of the proposed development.

Directly to the east, the surrounding area comprises predominantly low- to medium-density residential development, including dwelling houses, townhouses and smaller-scale residential buildings. The built form in this direction reflects the established suburban character of Castle Hill, transitioning incrementally toward higher-density outcomes within walking distance of the strategic centre.

Further toward the north and north-east, development intensity increases in proximity to the Castle Hill town centre and Metro station, where a mix of medium- and higher-density residential flat buildings, shop-top housing and mixed-use development has emerged. This pattern reflects a deliberate and planned intensification of land use in response to proximity to high-capacity public transport, retail and commercial uses, consistent with State and local strategic planning frameworks.

On this side the site is connected via Castle Street and the surrounding road network to Castle Hill Metro Station, located approximately 650 metres from the site. Areas closer to the station and along key transport corridors exhibit higher-density residential and mixed-use development, including outcomes influenced by Transport Oriented Development (TOD) zoning and the application of Low- and Mid-Rise Housing (LMR) provisions under the State Environmental Planning Policy (Housing) 2021.



Figure 4 View east along Castle Street

Overall, the surrounding context demonstrates a clear transition in scale and intensity, with the subject site positioned between lower-density residential neighbourhoods and the more intensive development occurring closer to the Castle Hill Strategic Centre and Metro station. Importantly, the site is adjoining and in close proximity to land zoned R4 High Density Residential, and is well placed to function as a logical extension of the existing high-density residential zone, rather than an isolated or anomalous outcome. This evolving context supports consideration of a mid to high-rise residential flat building that contributes to housing supply while responding appropriately to its surrounding built-form interfaces and transition conditions.

2.3 STRATEGIC CONTEXT

The proposed development is guided by the Greater Sydney Region Plan and the Central City District Plan, which together establish a metropolitan strategy focused on delivering new housing within existing centres and areas well serviced by public transport. These plans emphasise the role of strategic centres and station catchments in accommodating housing growth in locations that maximise access to employment, services and infrastructure while supporting reduced car dependence.



Within this framework, Castle Hill is identified as a Strategic Centre and forms part of the Sydney Metro Northwest corridor, which has been the subject of significant State investment in high-capacity public transport. State planning policy seeks to leverage this investment by encouraging increased residential density and housing diversity within walking distance of Metro stations, recognising that existing local planning controls in many locations pre-date the delivery of this infrastructure.

The site is located approximately 650 metres from Castle Hill Metro Station and within the broader Castle Hill Strategic Centre catchment. While the site is not subject to a State-led Growth Precinct or adopted precinct plan, State and local strategic planning frameworks consistently identify the Castle Hill centre and station catchment as an appropriate location for residential intensification, including mid-rise and higher-density housing forms, supported by public transport accessibility and established services.

At the local level, The Hills Local Strategic Planning Statement (LSPS) identifies Castle Hill as a key centre for housing diversity and increased residential density, particularly within walking distance of the Castle Hill Metro Station and town centre. The LSPS recognises the need for a graduated transition from traditional low- and medium-density residential areas toward higher-density housing forms in accessible locations, in response to population growth, housing demand and significant public transport investment. The subject site's location within this transition area, and its relationship to adjoining R4 High Density Residential land, supports consideration of a more intensive residential outcome than that envisaged under the existing R3 zoning controls.

The proposal has been reviewed by the NSW Housing Delivery Authority (HDA) as Expression of Interest 251795 and has been recommended for declaration as State Significant Development (SSD) under section 4.36(3) of the *Environmental Planning and Assessment Act 1979*. This endorsement confirms that the proposal aligns with Government priorities for accelerated housing delivery, including the provision of affordable housing, in locations serviced by high-capacity public transport. The HDA also confirmed that a concurrent Planning Proposal is an appropriate mechanism to facilitate the proposed development outcome, subject to detailed design and development standards being refined through the SSD merit assessment process.

Assessment of the proposal under the SSD pathway, together with a concurrent Planning Proposal to amend relevant development standards under The Hills Local Environmental Plan 2019, will enable coordinated State-level consideration of urban design quality, residential amenity, infrastructure capacity and public benefit outcomes. This approach will deliver greater density and housing than that provided under the current Housing SEPP and reflects established practice for HDA-endorsed projects where local planning controls have not yet been updated to reflect strategic transport investment and housing delivery objectives.

Overall, the proposed development is consistent with the strategic intent of State and local planning frameworks, which seek to:

- concentrate new housing within strategic centres and public transport catchments;
- deliver well-designed, diverse housing, including affordable housing, in accessible locations;
- support reduced car dependence and increased use of public and active transport; and
- facilitate a graduated transition of built form that responds to surrounding residential contexts while contributing to metropolitan housing supply objectives.

A zoning map of the subject site and surrounding area is provided in **Figure 5** below.

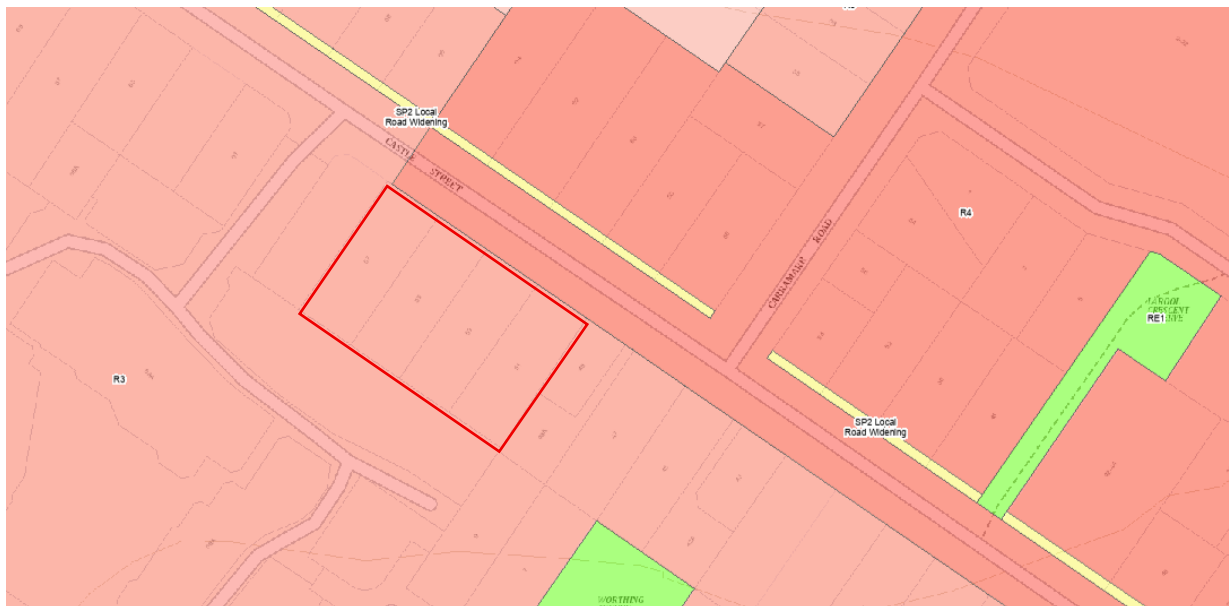


Figure 5 Zoning Map of subject site (Bounded in red) (Source: DoP Spatial Viewer)

The site is also identified within an indicative Low- and Mid-Rise Housing (LMR) area under State planning policy. While the indicative LMR mapping is non-statutory and does not confer development entitlement, it reflects a clear policy signal that this part of the Castle Hill locality is anticipated to accommodate increased residential density over time, particularly in proximity to the Castle Hill Strategic Centre and Metro station. This indicative designation reinforces the site's role within a broader transition area between established lower-density residential neighbourhoods and higher-density development closer to the station and provides additional strategic context for consideration of a mid-high rise residential outcome through the SSD and concurrent Planning Proposal pathway.

The LMR mapping of the subject site and surrounding area is provided in **Figure 6** below.

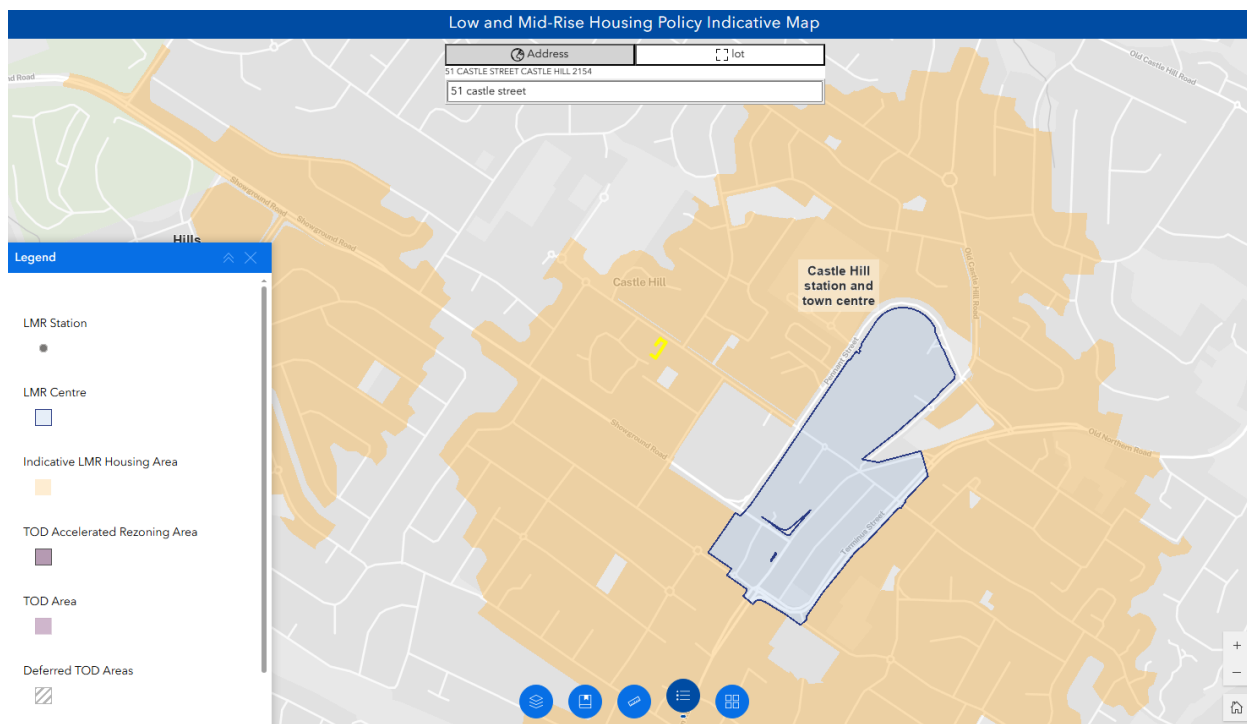


Figure 6 LMR Housing Policy Indicative Map (51 Castle Street shown in yellow).



It is noted that the distance from the mapped Castle Hill Town Centre to the boundary of the subject site is approximately 405m which is detailed in Figure 7 below.

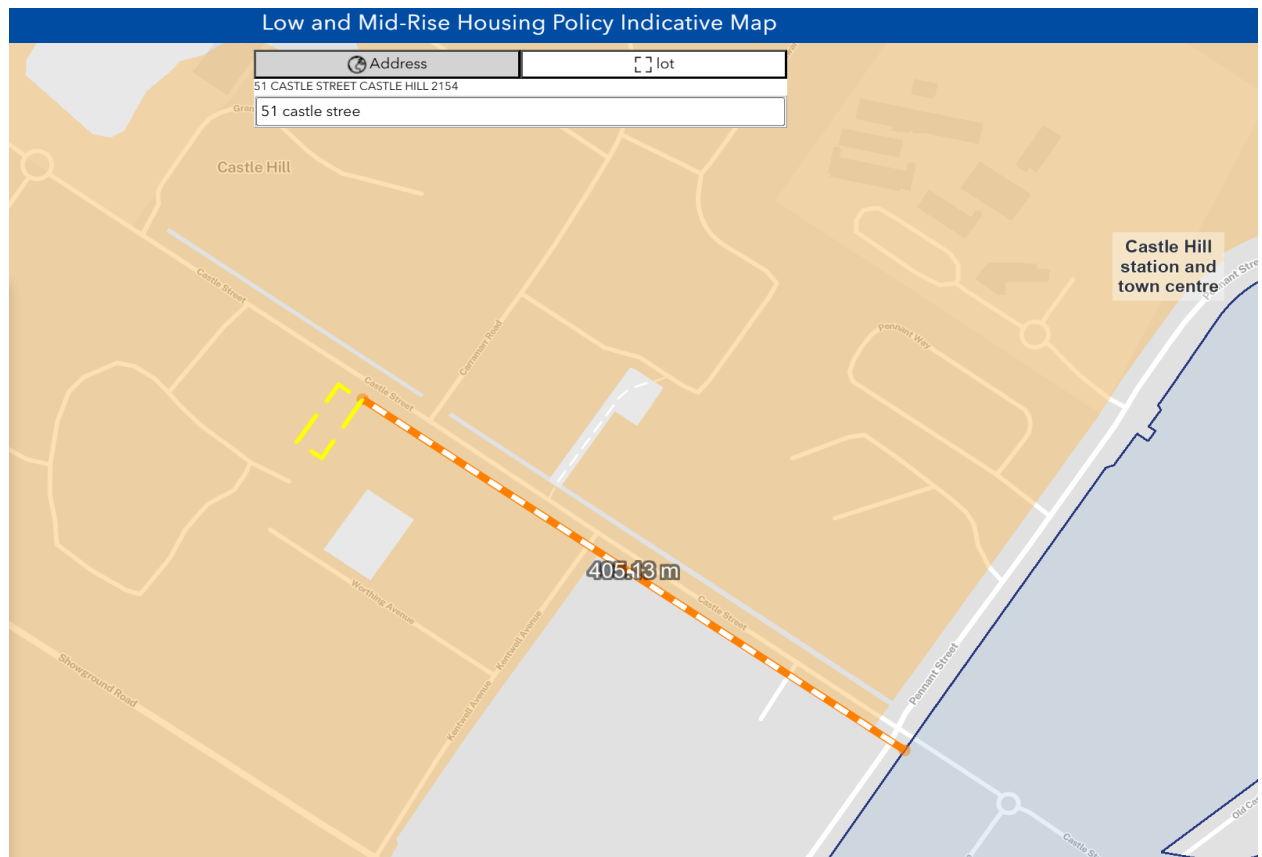


Figure 7 Distance of the edge of the site from the Town Centre

The client will be engaging a surveyor as the distance will determine the difference between the “inner” and “outer” area controls in the LMR. However, the Planning Proposal for Castle Towers Kentwell Avenue Site (PP-2022-3644) is currently in the pre-exhibition phase seeks the following for 17-25 Castle Street (uncoloured in Figure 7 above):

- Amending The Hills LEP Building Height Map to facilitate increased maximum permissible building heights across the Site up to a maximum of 88 metres (currently 7m to 28m under The Hills LEP 2019).
- Amending The Hills LEP Floor Space Ratio Map to allow a maximum incentive GFA of 171,585sqm across the Site (equivalent to an average FSR of 4.1:1 - currently 1.9:1 under The Hills LEP 2019).
- Amending The Hills LEP Land Zoning Map to rezone the location of the proposed public park as RE1 Public Recreation.

The aim is to deliver the following:

- A centrally located public park, accessible via pedestrian links to Pennant Street, Showground Road and Castle Street. The park will include open lawn space for outdoor events, an extensive active play area, a fitness circuit with exercise stations and a basketball half-court.
- A fine-grain pedestrian plaza lined with café and retail tenancies and integrated with a proposed footbridge bridge over Pennant Street. The plaza will feature outdoor seating and umbrellas, catenary lighting and tree plantings.
- Connection with the footbridge pedestrian bridge over Pennant Street, which will conveniently connect residents to the urban core of Castle Hill and the Metro Station.
- Approximately 1,431 dwellings across three high-density residential developments (Lots B, C and E), three mixed-use developments (Lots A, D and F) and a residential flat building and townhouses fronting Kentwell



Ave (Lot G). These dwellings will comprise a range of typologies, including stand-alone townhouses, podium townhouses and 1-, 2- and 3-bedroom apartments.

- Approximately 27,874 sqm of commercial and retail floor space across certain buildings, including a commercial tower on Lot A.
- An internal two-way street that runs between Showground Road, around the proposed public open space and onto Kentwell Avenue.
- Approximately 1,720 car parking spaces, determined as an appropriate parking-rate given the Site's proximity to the Castle Hill Metro Station.
- Planting of additional trees across the Site to increase the Site's canopy coverage from 20-30% to +40%.
- Stormwater management and water-sensitive urban design infrastructure, including infrastructure to manage overland flows from surrounding landholdings.

If approval is granted, the above planning proposal should have the effect of expanding the mapped Castle Hill Town Centre to ensure that the subject site is certainly within 400m which would constitute an inner area. The implications will be discussed below.

3. Description of the Proposal

3.1 RESIDENTIAL FLAT BUILDING DEVELOPMENT

3.1.1 Development History and Planning Processes

The subject site at No. 51–57 Castle Street, Castle Hill comprises a consolidated landholding currently occupied by detached residential dwellings and associated outbuildings. The land has historically been used for residential purposes and forms part of an established suburban neighbourhood zoned R3 Medium Density Residential under The Hills Local Environmental Plan 2019.

There is no recent development history involving major redevelopment proposals for the site. However, the broader Castle Hill locality has experienced progressive change and intensification, particularly within the Castle Hill Strategic Centre and areas adjoining Castle Hill Metro Station, following the delivery of the Sydney Metro Northwest. Recent approvals and emerging development patterns within the station catchment reflect a shift toward residential flat buildings and higher-density housing forms, supported by State and local strategic planning frameworks.

The proposed development was submitted to the NSW Housing Delivery Authority (HDA) as Expression of Interest 251795. Following assessment, the HDA recommended that the proposal be declared State Significant Development (SSD) under section 4.36(3) of the *Environmental Planning and Assessment Act 1979*, confirming that the proposal aligns with Government priorities for accelerated housing delivery in accessible, infrastructure-serviced locations. The HDA also confirmed that a concurrent Planning Proposal would be required to amend relevant development standards under The Hills LEP 2019 to facilitate the proposed outcome, noting that detailed design and development parameters would be refined through the SSD merit assessment process.

Progression of the proposal under the SSD pathway enables a coordinated assessment by the Department of Planning, Housing and Infrastructure (DPHI), allowing consideration of the proposal against State and local planning objectives including housing supply, affordable housing delivery, urban design quality, residential amenity and infrastructure capacity. This approach reflects established practice for HDA-endorsed projects where local planning controls have not yet been updated to reflect strategic transport investment and housing delivery objectives.

This Scoping Report represents the first formal step in progressing redevelopment of the site to deliver a mid-high rise residential flat building, supported by basement parking, landscaping and associated site infrastructure, facilitated through a concurrent Planning Proposal to increase the height for the site, noting no FSR is mapped for the site. The proposal responds to the site's strategic location within the Castle Hill Strategic Centre catchment, its proximity to Castle Hill Metro Station, and the opportunity to contribute meaningfully to housing supply, including affordable housing, in a location that is aligned with State housing delivery, transport and sustainability policy objectives.

3.2 THE PROPOSAL

The State Significant Development (SSD) Application will refine a concept for a mid-high rise residential flat building comprising:

- Approximately 115 dwellings, including a minimum 15% affordable housing component;
- A single residential building form with articulated massing and setbacks responding to surrounding residential interfaces;
- Basement parking accommodating resident and visitor parking; and
- Communal open space, landscaping and associated site infrastructure works.

The proposal seeks to deliver a high-quality residential outcome that responds to the site's location within the Castle Hill Strategic Centre catchment, its proximity to Castle Hill Metro Station, and the transitional character of the surrounding area between lower-density residential neighbourhoods and higher-density development closer to the station and town centre.

The proposed development is illustrated in the concept architectural plans prepared by PBD Architects accompanying this Scoping Report. The key elements of the proposal are summarised below.

Table 1 Proposed Development	
Building Height	Approximately 14-15 storeys above ground with basement parking
Dwellings	Approximately 115 apartments, comprising a mix of 1-, 2- and 3-bedroom dwellings, including a minimum 15% affordable housing component under the Housing SEPP
Land Use	Residential Flat Building
Parking and Access	Basement car parking accommodating resident and visitor parking accessed via Castle Street.
Vehicular Access	Single driveway access from Castle Street, with circulation to basement parking
Pedestrian Access	Primary pedestrian access from Castle Street, with clearly defined residential entries
Landscaping	Streetscape, Multi level and rooftop landscape treatments
Communal Open Space	Multi-Level including Podium-level and/or rooftop communal open space for residents
Sustainability	Designed in accordance with SEPP (Sustainable Buildings) 2022, incorporating energy-efficient design and WSUD measures
Stormwater Management	On-site stormwater management with connection to Council drainage infrastructure
Building Services	Fully serviced by existing urban infrastructure (water, sewer, power, telecommunications, NBN)
Public Domain Interface	Articulated building frontage and landscaped setbacks addressing Castle Street to enhance pedestrian amenity.
Construction Staging	Anticipated to be delivered as a single stage, subject to SSD consent and infrastructure coordination

A more detailed architectural response, including building elevations, sections, overshadowing analysis, solar access, Apartment Design Guide (ADG) compliance and environmental performance analysis, will accompany the Environmental Impact Statement (EIS). The preliminary concept plans included with this Scoping Report provide a high-level illustration of the proposed built form and its relationship to the surrounding context.

A concept image of the proposal is provided in **Figure 8** below.



Figure 8 Proposed Concept scheme (PBD Architects)

3.2.1 Building Design and Proposal Summary

Overall Layout: Overall Layout:

The proposed development comprises a single mid-high rise residential flat building arranged to respond to the site's consolidated landholding, generous street frontage to Castle Street, and its location within a transitional area between lower-density residential neighbourhoods and the Castle Hill Strategic Centre. The building layout is designed to optimise residential amenity, efficient circulation and an appropriate relationship with surrounding development, while enabling a clear and legible address to the public domain.

Basement parking is proposed beneath the building footprint, allowing the ground plane to prioritise pedestrian access, landscaping and residential entries. Communal open space is provided within the building envelope, including podium-level and/or rooftop spaces, to support high-quality onsite amenity for future residents.

Architectural Design:

The concept design prepared by PBD Architects adopts a contemporary residential architectural language, with articulated façades, modulation of building massing and varied setbacks to reduce perceived bulk and respond to the changing scale and character of development afforded by the LMR provisions of the Housing SEPP. The design approach emphasises high levels of daylight access, natural ventilation and outlook for residential apartments, while presenting a well-scaled and visually engaging frontage to Castle Street.

The building form is intentionally stepped and articulated, supporting a graduated transition in height and scale that reflects the evolving built form character of the Castle Hill locality. Detailed architectural design, including façade treatments, materials and articulation, will be refined as part of the SSD design development process and informed by urban design and amenity testing undertaken for the Environmental Impact Statement (EIS).



Communal Areas and Open Space:

Multi-Level communal open space, including roof top, will be provided for residents in accordance with the ADG, incorporating landscaped terraces, seating areas and passive recreation spaces. These areas are intended to maximise solar access, outlook and residential amenity, and will be integrated with the overall landscape strategy for the site. Opportunities for deep-soil planting and canopy tree provision will be explored where feasible, subject to detailed design and basement layout.

Access and Circulation:

Vehicular access to the site will be provided from Castle Street, with circulation to basement parking levels. The access strategy will be designed to minimise vehicle–pedestrian conflict and support safe and efficient movement within the local street network.

Pedestrian access will be clearly defined from Castle Street, with a primary residential entry providing a strong and legible address to the public domain. Internal circulation will be provided via a centralised residential core serving all apartment levels. Parking provision, bicycle storage and end-of-trip facilities will be designed in accordance with relevant Australian Standards, the State Environmental Planning Policy (Transport and Infrastructure) 2021, and applicable Council controls, subject to SSD assessment.

Sustainability:

The proposed development will be designed to comply with the State Environmental Planning Policy (Sustainable Buildings) 2022, incorporating passive design principles, building envelope optimisation, energy-efficient services and water-sensitive urban design measures. Sustainability initiatives will be further developed and documented as part of the EIS, with consideration given to opportunities for improved operational performance and reduced environmental impact.

Servicing and Infrastructure:

The development will connect to existing urban utility networks, including water, sewer, stormwater drainage, electricity and telecommunications. Any required service upgrades or augmentation will be identified through consultation with relevant authorities during the EIS process. No major off-site infrastructure works are anticipated at this stage.

Construction and Staging:

The development is anticipated to be delivered as a single construction stage, subject to the grant of SSD consent and coordination with service authorities. Construction methodology, staging and management measures will be addressed in detail within the EIS to ensure appropriate mitigation of construction-related impacts.

3.3 SUSTAINABILITY AND ENVIRONMENTAL CONSIDERATIONS

The proposed development has been designed to achieve a high standard of environmental performance, consistent with the State Environmental Planning Policy (Sustainable Buildings) 2022, the Apartment Design Guide (ADG) and relevant objectives of The Hills Development Control Plan. The Environmental Impact Statement (EIS) will demonstrate best-practice outcomes relating to energy and water efficiency, residential amenity, urban heat mitigation, landscape design and long-term building performance, commensurate with the scale and nature of the proposal.

Environmental Context and Constraints

The site is located within an established urban residential area that is fully serviced by existing infrastructure. The site is not affected by significant environmental constraints such as flooding or biodiversity corridors. As a previously developed residential site within a suburban context, biodiversity impacts are expected to be limited. Key environmental considerations for the proposal relate to sustainable building performance, amenity outcomes, landscaping and construction impacts, all of which will be addressed in detail through the EIS.



Energy and Resource Efficiency

The development will seek to minimise operational energy demand and greenhouse gas emissions through a combination of passive and active design measures, including:

- Building orientation and apartment layouts to maximise daylight access and natural ventilation;
- A high-performance building envelope, including appropriate glazing and shading;
- Energy-efficient building services, lighting and appliances;
- Provision for electric vehicle (EV) charging infrastructure and smart metering; and
- Opportunities to enhance building performance beyond minimum standards, subject to detailed design.

Where required under the SEPP (Sustainable Buildings) 2022, a Whole-of-Life Carbon Assessment will be prepared to assess embodied and operational emissions and inform low-carbon material selection.

Water Efficiency and Stormwater Management

A Water efficiency will be achieved through a combination of water-efficient fixtures, rainwater capture and reuse for landscape irrigation, and water-sensitive landscape design. A stormwater management strategy will be prepared to manage runoff and water quality prior to discharge to Council's drainage system, consistent with applicable Council requirements. Water-Sensitive Urban Design (WSUD) measures will be integrated where appropriate to support improved water quality and reduce peak flows.

Urban Heat Mitigation and Landscape Design

Landscape design will play a key role in enhancing residential amenity and mitigating urban heat impacts. Measures to be incorporated include:

- Canopy tree planting and soft landscaping to improve shade and microclimate;
- Use of permeable surfaces and low-albedo materials where feasible;
- Integration of landscaping within communal open space areas; and
- Opportunities for deep-soil planting or equivalent solutions, subject to basement configuration.

These measures will contribute to improved thermal comfort, visual amenity and environmental performance.

Acoustic and Air Quality Considerations

An Acoustic Assessment will be undertaken to inform façade design and internal amenity measures, ensuring compliance with relevant standards, including AS 2107–2016 where applicable. Construction-phase noise, dust and air quality impacts will be managed through appropriate mitigation measures and documented within a Construction Environmental Management Plan (CEMP).

Waste, Materials and Circular Economy

A Waste Management Plan will be prepared as part of the EIS to address waste generation, storage and collection arrangements for both construction and operation phases. The proposal will incorporate:

- Dedicated waste storage areas within the building;
- Waste separation and recycling facilities; and
- Measures to minimise construction waste and support reuse and recycling in accordance with circular-economy principles.



Material selection will consider durability, maintenance and environmental performance to support long-term sustainability outcomes.

Compliance with SEPP (Sustainable Buildings) 2022

The development will demonstrate compliance with the State Environmental Planning Policy (Sustainable Buildings) 2022, including:

- Achievement of relevant BASIX energy and water targets;
- Integration of passive design and energy-efficient services;
- Support for active and public transport use, reflecting proximity to Castle Hill Metro Station; and
- Consideration of sustainability verification and performance monitoring where appropriate.

Collectively, these measures will ensure the proposal delivers a high-amenity, energy-efficient and environmentally responsible residential development, consistent with State and local sustainability objectives and the site's role within a transit-supported strategic centre catchment.

3.4 AFFORDABLE HOUSING

The proposed development includes a commitment to deliver a minimum of 15% affordable housing under Chapter 2 of the Housing SEPP, consistent with the objectives of the NSW Housing Delivery Authority (HDA) and broader State policy to increase the supply of affordable rental housing in well-located, infrastructure-serviced areas.

The affordable housing component will be integrated within the residential flat building and delivered as part of the overall development, ensuring equitable access to building amenities and a high standard of residential amenity consistent with the Apartment Design Guide. The dwellings will be distributed within the building and designed to the same architectural and environmental performance standards as the market housing component.

The affordable housing offer reflects the site's strategic location within the Castle Hill Strategic Centre catchment, approximately 650 metres from Castle Hill Metro Station, and its suitability for delivering affordable housing in proximity to employment, services and high-capacity public transport. This location aligns with State objectives to concentrate affordable housing within accessible centres to support social inclusion and reduced transport costs for residents.

The affordable housing dwellings are intended to be secured for affordable rental purposes for a minimum period consistent with the Housing SEPP (15 years), and to be managed by a registered Community Housing Provider, subject to final agreement. The detailed delivery mechanism, tenure mix and management arrangements will be documented as part of the Environmental Impact Statement (EIS) and refined through the SSD assessment process.

The inclusion of affordable housing is a key public benefit of the proposal and forms a central component of the project's endorsement through the HDA pathway. Assessment of the proposal under the State Significant Development and concurrent Planning Proposal pathway will enable coordinated consideration of the affordable housing offer alongside built form, amenity and infrastructure matters.

Overall, the proposal will contribute meaningfully to the supply of affordable housing within The Hills Shire, delivering well-located, high-quality dwellings in a location supported by public transport and services, consistent with State housing delivery objectives.

4. Environmental Planning Framework

4.1 STATUTORY PLANNING POLICIES

The proposed development is being advanced as State Significant Development (SSD) following endorsement by the NSW Housing Delivery Authority (HDA). This pathway recognises the project's strategic location within the Castle Hill Strategic Centre catchment, its proximity to Castle Hill Metro Station, and its alignment with State priorities for accelerating housing supply, including the delivery of affordable housing, in accessible, infrastructure-serviced locations.

Assessment and determination of the application will occur under Division 4.7 of the Environmental Planning and Assessment Act 1979 (EP&A Act). As an SSD, the proposal will be assessed by the Department of Planning, Housing and Infrastructure (DPHI), with consultation undertaken with The Hills Shire Council and relevant State agencies as required. The proposal is not subject to local concurrence or referral processes, although Council input will inform the assessment.

The legislation and environmental planning instruments (EPIs) applying to the proposed development include, but are not limited to:

- Environmental Planning and Assessment Act 1979 (NSW)
- Environmental Planning and Assessment Regulation 2021
- State Environmental Planning Policy (Planning Systems) 2021 – administrative provisions for SSD assessment
- State Environmental Planning Policy (Housing) 2021 – Chapter 2 (Affordable Housing), Chapter 4 (Design Quality of Residential Apartment Development) and Chapter 6 (Low and Mid Rise Housing)
- State Environmental Planning Policy (Resilience and Hazards) 2021 – consideration of contamination, geotechnical conditions and other site-specific hazards.
- State Environmental Planning Policy (Transport and Infrastructure) 2021 – traffic, access, parking and transport impact assessment requirements.
- State Environmental Planning Policy (Sustainable Buildings) 2022 – energy efficiency, water efficiency, sustainability and environmental performance standards.
- State Environmental Planning Policy (Biodiversity and Conservation) 2021 – applies generally across NSW; no significant biodiversity constraints are anticipated for the site.
- The Hills Local Environmental Plan 2019, including:
 - R3 applies currently, and
 - Existing development standards, including the 9 metre maximum building height, which will be addressed through a concurrent Planning Proposal to facilitate the proposed development
 - No FSR is currently mapped for the site
- The Hills Development Control Plan – while not binding for SSD (in accordance with the Planning Systems SEPP), its principles relating to residential amenity, landscape design and public domain outcomes will inform the EIS where relevant.

In preparing the Environmental Impact Statement (EIS), consideration will also be given to the following guidelines and policies:

- Apartment Design Guide (ADG)
- Sustainable Buildings Guideline (2022), BASIX protocols

- Transport for NSW Guide to Traffic and Transport Impact Assessment (2023)
- EPA Noise, Vibration and Construction Management Guidelines
- Better Placed (2017) and the Design and Place SEARs Template for HDA projects
- NSW Urban Heat and Green Infrastructure Guidelines (2022)

This statutory and policy framework will ensure that the proposal is assessed against all relevant legislative requirements and design-performance standards applicable to a mid-rise residential flat building delivered through the SSD and concurrent Planning Proposal pathway within the Castle Hill Strategic Centre catchment.

4.2 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The Environmental Planning and Assessment Act 1979 (EP&A Act) is the principal planning legislation governing development in New South Wales and applies to the proposed development. The proposal is being advanced as State Significant Development (SSD) and will be assessed under Division 4.7 (Sections 4.36–4.43) of the EP&A Act.

The Environmental Impact Statement (EIS) prepared in response to the Secretary's Environmental Assessment Requirements (SEARs) will address all relevant matters under section 4.15, including detailed assessment of built form, residential amenity, environmental performance, traffic and access, infrastructure servicing and public benefit outcomes. The assessment will be undertaken having regard to the concurrent Planning Proposal to amend the height of buildings development standard under The Hills Local Environmental Plan 2019, as permitted under the SSD framework.

4.3 LOCAL GOVERNMENT ACT 1993 (LG ACT)

The Local Government Act 1993 (LG Act) applies generally to approvals and ongoing operations of developments within local government areas. As the proposal will be assessed and determined under the SSD provisions of the EP&A Act, approvals ordinarily required under the LG Act (e.g. Section 68 activity approvals) are not separately required. Nevertheless, the EIS will confirm that the development satisfies the performance and service objectives of the LG Act, including public-domain interface, waste management and infrastructure servicing standards.

4.4 ENVIRONMENTAL PLANNING AND ASSESSMENT REGULATION 2021

The Environmental Planning and Assessment Regulation 2021 prescribes procedural requirements for the preparation, form and lodgement of State Significant Development applications. Relevant provisions include requirements for an Environmental Impact Statement (EIS), as set out in Part 12, Division 5 of the Regulation, which mandate that the EIS must:

- Describe the project and its capital investment value (CIV);
- Address the Secretary's Environmental Assessment Requirements (SEARs);
- Summarise consultation undertaken with public authorities and stakeholders;
- Present the environmental and technical assessments informing the design; and
- Identify measures to avoid, minimise and offset impacts.

The Regulation also outlines requirements for public exhibition, notification, consultation, and post-determination processes, including management of modification applications, compliance reporting, and enforcement.

The EIS for the proposal will be prepared in accordance with the Regulation and lodged via the Major Projects Portal, consistent with the SSD pathway.

4.5 STATE ENVIRONMENTAL PLANNING POLICY (PLANNING SYSTEMS) 2021

The State Environmental Planning Policy (Planning Systems) 2021 establishes the statutory framework for the assessment and determination of State Significant Development (SSD) in NSW. Under Division 4.7 of the Environmental Planning and Assessment Act 1979, development may be identified as SSD either by satisfying the criteria set out in Schedule 1 of the Planning Systems SEPP or by Ministerial declaration.

Ministerial SSD Declaration (HDA Project):

The proposed development at No. 51–57 Castle Street, Castle Hill has been endorsed through the NSW Housing Delivery Authority (HDA) process and recommended for declaration as State Significant Development. The proposal has subsequently been declared SSD by the Minister for Planning under section 4.36(3) of the *Environmental Planning and Assessment Act 1979*, with the declaration published as a Ministerial Planning Order on the NSW Planning Portal.

Accordingly, the proposal is identified as SSD by Ministerial declaration, rather than by satisfying the development thresholds set out in Schedule 1 (including clause 26A) of the Planning Systems SEPP.

As a result of its SSD status:

- the development will be assessed and determined by the Department of Planning, Housing and Infrastructure (DPHI);
- local development assessment pathways under Part 4 of the EP&A Act do not apply; and
- an Environmental Impact Statement (EIS) must be prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs), including any industry-specific SEARs applicable to HDA-endorsed projects.

The HDA's endorsement of the proposal confirms that it:

- aligns with the State's priorities for accelerated housing delivery, including the provision of affordable housing, in accessible locations serviced by high-capacity public transport;
- is of a scale and strategic relevance that warrants State-coordinated assessment; and
- is suitable for a streamlined and proportionate SEARs framework to support timely progression of the project through the SSD process.

Specifically, the HDA Official Briefing Note states as follows for the proposal:

21.	251795 - <u>51-57 Castle Street</u>, Castle Hill - Planning Ingenuity Summary of proposal: A 14 storey building with 115 apartments and 15% affordable housing No of dwellings (indicative): 115 Concurrent rezoning: Yes	The HDA: • Recommended to the Minister that this project be declared SSD under s4.36(3) of the EP&A Act • Noted the reasons for HDA recommendation: ◦ The proposal adequately satisfies the objectives and criteria of the HDA EOI. • Formed the view that the development proposal is of state significance as it satisfies the HDA SSD criteria. • Provided the following advice to the Minister:
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No.	Description	Record of Briefing
		○ The proposal has State significance as it is a major residential project as it satisfies the HDA SSD criteria established in the document "HDA consideration of State significance under s4.36 of the EP&A Act." • Recommended that the applicant be advised that a merit assessment may result in development standards and dwelling yield lower than proposed in the EOI application. • Noted there are no member conflict of interests.

Figure 9 HAD EOI declaration

Accordingly, the concurrent Planning Proposal and State Significant Development Application (SSDA) will be assessed by the Department of Planning, Housing and Infrastructure (DPHI), in consultation with The Hills Shire Council and relevant State agencies.

The Environmental Impact Statement (EIS) will confirm the project's capital investment value, address relevant provisions of the State Environmental Planning Policy (Housing) 2021, and demonstrate that the proposal achieves appropriate outcomes in relation to design quality, residential amenity, sustainability, affordable housing delivery and infrastructure capacity, consistent with the objectives of the Housing Delivery Authority pathway and broader State housing delivery priorities.

4.6 STATE ENVIRONMENTAL PLANNING POLICY (RESILIENCE AND HAZARDS) 2021

The State Environmental Planning Policy (Resilience and Hazards) 2021 establishes requirements for the consideration of land contamination, geotechnical conditions and other site-specific hazards to ensure land is suitable for its intended use.

Land Contamination

Chapter 4 of the SEPP requires consideration of whether land is contaminated and, if so, whether it is suitable or can be made suitable for the proposed development. The subject site has historically been used for residential purposes and is not known to be affected by contamination associated with intensive industrial or commercial activities.

A Preliminary Site Investigation (PSI) will be undertaken as part of the Environmental Impact Statement (EIS) to confirm the contamination status of the land. Given the age of some existing dwellings, the PSI will consider the potential presence of materials typically associated with older residential buildings, such as asbestos-containing materials or lead-based paint. Should the PSI identify potential contamination risks, further investigation and, if necessary, remediation measures will be undertaken in accordance with the Contaminated Land Management Act 1997, relevant EPA Guidelines and the SEPP (Resilience and Hazards) 2021.

Flooding and Natural Hazards

The site is not located within a mapped floodplain and is not subject to flood-related development controls. Accordingly, flooding is not anticipated to be a determinative constraint for the proposal. The EIS will confirm the site's flood status and address any relevant stormwater management considerations consistent with Council requirements.

The site is not identified as bushfire-prone land. As such, bushfire risk is not expected to present a significant constraint to the proposed development.

Geotechnical Considerations

Geotechnical considerations associated with basement excavation and building foundations will be addressed through a Geotechnical Investigation, which will inform foundation design, excavation methodology and construction staging. This investigation will consider local soil conditions, groundwater levels and slope characteristics typical of the Castle Hill locality.

Key Matters for the EIS

In accordance with SEPP (Resilience and Hazards) 2021, the EIS will address the following matters, where relevant:

- Preliminary contamination assessment and confirmation of land suitability for residential use;
- Any required remediation or management measures identified through site investigations;
- Geotechnical conditions relevant to basement construction and building stability;
- Stormwater management and integration with Council's drainage system; and
- Construction-phase environmental management, including erosion and sediment control measures.

The EIS will demonstrate that the site is suitable, or can be made suitable, for the proposed residential flat building and that the development can be undertaken in accordance with the requirements of the State Environmental Planning Policy (Resilience and Hazards) 2021.

4.7 STATE ENVIRONMENTAL PLANNING POLICY (TRANSPORT AND INFRASTRUCTURE) 2021

The State Environmental Planning Policy (Transport and Infrastructure) 2021 establishes assessment and referral requirements for development that has the potential to impact transport infrastructure, including development on or adjacent to classified roads, rail corridors, or development generating significant traffic and transport demand.

Under Schedule 3 of the SEPP, certain development types are required to be referred to Transport for NSW (TfNSW) for advice. While the proposed residential flat building comprises approximately 115 dwellings, which is below the 200-dwelling referral threshold for residential flat buildings, the Department may still consult TfNSW having regard to the site's proximity to the Sydney Metro Northwest and the broader transport network.

Vehicular access to the site is proposed from Castle Street, which is a local road under the care and control of The Hills Shire Council, and does not involve direct access to a classified or regional road. Accordingly, formal referral under is not triggered on the basis of road access.

Notwithstanding this, a Traffic and Transport Impact Assessment (TIA) will be prepared as part of the Environmental Impact Statement (EIS) to assess the transport implications of the proposal and to inform consultation with relevant agencies. The TIA will address, where relevant:

- vehicular access design, servicing arrangements and sight-distance requirements;
- car parking provision and demand, including visitor parking;
- pedestrian connectivity and universal access to Castle Street and surrounding footpaths;
- cyclist access and bicycle parking provision;
- proximity and connectivity to Castle Hill Metro Station and local bus services;
- impacts on the surrounding local road network and nearby intersections; and
- construction traffic, including preparation of a Construction Traffic Management Plan (CTMP).



The site benefits from high levels of public transport accessibility, including convenient walking access to Castle Hill Metro Station and local bus services, supporting reduced reliance on private vehicles and alignment with State objectives for mode shift and transit-oriented development. Assessment under the SSD pathway will ensure that traffic, access and transport matters are appropriately addressed in consultation with TfNSW and Council, as required.

4.8 STATE ENVIRONMENTAL PLANNING POLICY (SUSTAINABLE BUILDINGS) 2022

The SEPP (Sustainable Buildings) 2022 establishes minimum sustainability requirements for new residential and non-residential development, including energy, water, operational performance, and embodied-carbon reporting standards. The proposed development will be designed to demonstrate compliance with the SEPP and the associated Sustainable Buildings Guideline (2022) through:

- BASIX-compliant apartments meeting or exceeding energy and water performance requirements;
- Integration of water-sensitive urban design (WSUD) measures within landscaping and stormwater systems;
- Provision of EV-ready parking, energy-efficient lift and building services, and smart metering capability;
- Inclusion of on-site renewable energy (e.g. rooftop PV) where feasible, and high-performance façade systems to reduce energy load;
- Consideration of embodied carbon reductions through materials selection and construction methodologies; and
- Design measures to reduce urban heat, including canopy planting, shading and low-albedo materials.

Where required under the SEPP, the Environmental Impact Statement (EIS) will include a Sustainability Strategy and supporting modelling demonstrating compliance with the Policy, including quantification of greenhouse gas emissions, energy demand and water use reductions achieved by the proposed development.

The proposal's proximity to Castle Hill Metro Station further supports the objectives of the SEPP by encouraging reduced car dependence and supporting more sustainable travel patterns, consistent with broader State sustainability and housing delivery goals.

4.9 STATE ENVIRONMENTAL PLANNING POLICY (HOUSING) 2021 –

The State Environmental Planning Policy (Housing) 2021 provides the primary State policy framework governing the design quality of residential apartment development and the delivery of affordable housing in New South Wales. The Policy applies to the proposed residential flat building at Nos. 51–57 Castle Street, Castle Hill.

The development is subject to:

- Chapter 2 -Affordable Housing, enabling the delivery of in-fill affordable housing where dedicated or managed by an appropriate Community Housing Provider (CHP).–
- Chapter 4- Design Quality of Residential Apartment Development, requiring the proposal to address the Design Quality Principles and demonstrate consistency with the Apartment Design Guide (ADG); ; and
- Chapter 6 – Low and Mid Rise Housing (LMR) permitting residential flat buildings in R3 Medium Density zones and providing non-discretionary development standards for height and FSR.

Consistent with the proposal's endorsement through the Housing Delivery Authority (HDA) pathway, the development includes a commitment to deliver a minimum 15% affordable housing component under Chapter 2 of the Housing SEPP for 15 years. The Environmental Impact Statement (EIS) will include an Affordable Housing Statement detailing the proportion of affordable housing, dwelling mix, tenure arrangements and management framework, consistent with the Housing SEPP and HDA requirements.

An Urban Design and Architectural Design Report will be prepared to demonstrate how the proposal satisfies the Design Quality Principles under the Housing SEPP, including:

- response to context, including the site's location within the Castle Hill Strategic Centre catchment and its transitional built-form setting;
- density, amenity and liveability outcomes, including apartment mix, minimum dwelling sizes, solar access and natural ventilation;
- provision of communal open space in accordance with the ADG, including landscaped areas that support resident amenity;
- privacy, acoustic performance and building separation consistent with ADG standards; and
- safety, sustainability and CPTED principles, including design measures that support walking, cycling and public transport use.

The EIS will assess compliance with key ADG requirements relating to solar access, cross-ventilation, circulation efficiency, communal open space and building separation. While deep-soil planting opportunities may be constrained by basement construction, equivalent landscape outcomes will be delivered through a combination of landscaped setbacks, communal open space planting, canopy trees and rooftop or podium-level landscaping, consistent with the intent of the ADG.

In terms of the LMR provisions, these provisions provide the permissibility and minimum development standards that are applicable for the proposed development. In this regard, cl174 of the Housing SEPP permits residential flat buildings in the R3 Medium Density Residential Zone which provides the route to permissibility and no need to alter the current zoning under The Hills LEP. Furthermore, the provisions of cl180 of the Housing SEPP provide for minimum development standards for height and FSR which are dependent on the site being within an "inner" or "outer" area. As discussed in Part 2.3 above, there is some uncertainty over the measurement and a detailed survey will be undertaken with the EIS.

Regardless of this a summary of the applicable controls for the subject site are provided in Table 2 below:

Table 2 LMR Provisions (cl180 of Housing SEPP)		
	Inner Area (0-400m)	Outer Area (400-800m)
Height	22m (RFB)	17.5m
FSR	2.2:1	1.5:1

When adding the "bonus" height and FSR afforded under Cl16 of the Housing SEPP, which provides up to 30% based on an affordable housing contribution of 15%, the maximum permissible height and FSR under the Housing SEPP is provided in Table 3 as follows:

Table 3 LMR Provisions (cl180 of Housing SEPP) with Affordable Housing "Bonus"		
	Inner Area (0-400m)	Outer Area (400-800m)
Height	28.6m (RFB)	22.75m
FSR	2.86:1	1.95:1

Overall, the Housing SEPP establishes the mandatory design-quality, affordable-housing, permissibility and non-discretionary development standards that superseded The Hills LEP which will guide the detailed design assessed through the EIS. Assessment under the SSD and concurrent Planning Proposal pathway will ensure the proposal delivers high-quality residential outcomes consistent with State housing, design and amenity objectives.

Permissibility of Residential Flat Buildings

Clause 174 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) provides that residential flat buildings are permitted with development consent on land to which Chapter 6 applies that is located within a Low and Mid Rise Housing Area in the R2 Low Density Residential or R3 Medium Density Residential zones. Clause 174 states:

“Development for the purposes of residential flat buildings is permitted with development consent on land to which this chapter applies in a low and mid rise housing area in Zone R2 Low Density Residential or R3 Medium Density Residential.”

This clause establishes permissibility for residential flat buildings within the relevant zones where land is identified as being within a Low and Mid Rise Housing Area. The subject site is located within the mapped Low and Mid Rise Housing Area and therefore falls within the scope of Clause 174.

Clauses 175–180 of the Housing SEPP establish development standards relating to height and storeys for development within Inner and Outer Low and Mid Rise Housing Areas. These provisions operate as development standards rather than provisions determining land use permissibility.

This structure is consistent with the approach adopted within the Standard Instrument LEP framework, where land use permissibility is established through zoning provisions (typically contained within Part 2 of the instrument), while development standards are addressed separately. Non-compliance with a development standard does not, of itself, render development prohibited; rather, such standards may be varied where appropriate through the mechanisms available under the Environmental Planning and Assessment Act and relevant environmental planning instruments.

In this regard, Clauses 175–180 of the Housing SEPP operate in a similar manner to other development standards and may be varied where justified. These clauses are not expressly excluded from the operation of Clause 4.6 of the Standard Instrument – Principal Local Environmental Plan, and in practice similar provisions have been varied in a number of development assessments where appropriate planning grounds were demonstrated.

The Housing SEPP also contains numerous provisions that establish land use permissibility independently of LEP zoning tables. Examples include provisions permitting secondary dwellings, co-living housing, and dual occupancies and semi-detached dwellings in certain circumstances. In accordance with Section 3.28 of the Environmental Planning and Assessment Act 1979, a State Environmental Planning Policy prevails over a Local Environmental Plan to the extent of any inconsistency. Accordingly, where the Housing SEPP expressly provides permissibility for a form of development, that permissibility operates independently of the LEP zoning table.

On this basis, Clause 174 of the Housing SEPP provides a clear statutory pathway for residential flat buildings to be considered with development consent on land within the mapped Low and Mid Rise Housing Area in the R3 zone. While the proposal seeks development outcomes that exceed the development standards prescribed under Clauses 175–180, this does not of itself render the development prohibited.

Notwithstanding the above interpretation, the project is being progressed with a concurrent Planning Proposal to amend the applicable zoning and development standards to ensure a clear and coordinated statutory framework for the assessment of the proposal through the State Significant Development pathway.

4.10 THE HILLS LOCAL ENVIRONMENTAL PLAN 2019

The Hills Local Environmental Plan 2019 (HLEP 2019) is the principal statutory planning instrument governing land use, zoning and development standards applying to the subject site.

The land at Nos. 51–57 Castle Street, Castle Hill is currently zoned R3 Medium Density Residential under HLEP 2019. While the R3 zone seeks to provide a variety of medium-density housing types, residential accommodation (including residential flat buildings) is a prohibited land use within the zone. Accordingly, the proposed development relies upon CI174 of the Housing SEPP for permissibility.

The site is currently subject to a maximum height of buildings development standard of 9 metres but there is no mapped FSR development standard applicable for the subject site. These controls pre-date the delivery of the Sydney Metro Northwest and do not reflect the site's proximity to Castle Hill Metro Station, its location within the Castle Hill Strategic Centre catchment, or the established and emerging pattern of higher-density residential development permitted under CI180 of the Housing SEPP.

The proposed development is therefore being advanced as a State Significant Development (SSD) with a concurrent Planning Proposal to amend associated development standards under HLEP 2019. Whilst rezoning of the subject site to R4 High Density Residential is not necessarily required given cl174 of the Housing SEPP, the client would be willing to incorporate a rezoning to R4 if sought by the Department.

As discussed above, the site is located within the LMR area which will result in a significant change in character to the locality. Notably, the Housing SEPP makes residential flat buildings permissible and establishes an FSR for the site, where one previously did not exist.

The Planning Proposal will be assessed concurrently with the SSD Application to amend the height of buildings development standard and introduce an FSR development standard for the subject site, reflective of the proposed development. This will ensure that the proposed uplift is considered holistically alongside design quality, residential amenity, infrastructure capacity, traffic impacts and public benefits, including the provision of affordable housing. This approach is consistent with established practice for HDA-endorsed projects, where existing local controls no longer reflect strategic planning objectives or major public transport investment.

The following sections of this report summarise the key provisions of HLEP 2019 relevant to the proposal and outline how the proposed development responds to the objectives of the R4 High Density Residential zone and the broader State and local strategic planning framework.

4.10.1 Zoning and Permissibility

Under the Hills Local Environmental Plan 2019, the subject site at Nos. 51–57 Castle Street, Castle Hill is zoned R3 Medium Density Residential.

The following are the land uses permitted and prohibited within the existing R3 zone:

2 Permitted without consent

Home Business; Home Occupations

3 Permitted with consent

Attached dwellings; Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Dual occupancies; Dwelling houses; Group homes; Home-based child care; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; Respite day care centres; Roads; Seniors housing; Tank-based aquaculture; Any other development not specified in item 2 or 4

4 Prohibited

Agriculture; Air transport facilities; Airstrips; Amusement centres; Animal boarding or training establishments; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Correctional centres; Crematoria; Depots; Eco-tourist facilities; Electricity generating works; Entertainment facilities; Environmental facilities; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Function centres; Heavy industrial storage establishments; Helipads; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Information and education facilities; Jetties; Local distribution premises; Marinas; Mooring pens; Moorings; Mortuaries; Open cut mining; Passenger transport facilities; Port facilities; Public administration buildings; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Research stations; Residential accommodation; Restricted premises; Rural industries; Service stations; Sewerage systems; Sex services premises; Signage; Storage premises; Tourist and



visitor accommodation; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Veterinary hospitals; Warehouse or distribution centres; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies

As discussed above, whilst residential accommodation is prohibited in the zone, cl174 of the Housing SEPP expressly permits residential flat buildings in the R3 zone. Whilst there is no need to rezone the site, the applicant is willing to include a rezoning from R3 Medium Density Residential to R4 High Density Residential in the Planning Proposal.

The following are the land uses permitted and prohibited within the R4 zone:

2 Permitted without consent

Home Business; Home Occupations

3 Permitted with consent

*Attached dwellings; Boarding houses; Building identification signs; Business identification signs; Centre-based child care facilities; Community facilities; Dual occupancies; Dwelling houses; Home-based child care; Multi dwelling housing; Neighbourhood shops; Oyster aquaculture; Places of public worship; **Residential flat buildings**; Respite day care centres; Roads; Shop top housing; Any other development not specified in item 2 or 4*

4 Prohibited

Agriculture; Air transport facilities; Airstrips; Amusement centres; Animal boarding or training establishments; Boat building and repair facilities; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Correctional centres; Crematoria; Depots; Eco-tourist facilities; Electricity generating works; Entertainment facilities; Environmental facilities; Exhibition villages; Extractive industries; Farm buildings; Forestry; Freight transport facilities; Function centres; Heavy industrial storage establishments; Helipads; Highway service centres; Home occupations (sex services); Industrial retail outlets; Industrial training facilities; Industries; Information and education facilities; Jetties; Local distribution premises; Marinas; Mooring pens; Moorings; Mortuaries; Open cut mining; Passenger transport facilities; Port facilities; Public administration buildings; Recreation facilities (indoor); Recreation facilities (major); Recreation facilities (outdoor); Registered clubs; Research stations; Residential accommodation; Restricted premises; Rural industries; Service stations; Sewerage systems; Sex services premises; Signage; Storage premises; Tourist and visitor accommodation; Transport depots; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Veterinary hospitals; Warehouse or distribution centres; Waste or resource management facilities; Water recreation structures; Water supply systems; Wharf or boating facilities; Wholesale supplies

Irrespective of the R3 or R4 zoning, the proposal meets the objectives of the zone, which will be detailed in the EIS for the application.

The SSD and concurrent Planning Proposal pathway provides the correct statutory mechanism to assess and facilitate the proposed development in a manner consistent with contemporary planning objectives for the Castle Hill Strategic Centre and Sydney Metro Northwest corridor.

Other Principal Development Standards

- Clause 4.3 (HOB) – the subject site is currently mapped for 9m height of buildings development standard. However, under Cl180 of the Housing SEPP a non-discretionary height of between 17.5-22m is applicable to the site and surrounding properties dependent on the distance from the Castle Hill Town Centre.

The concurrent Planning Proposal seeks to amend the height of buildings development standard to reflect the concept scheme.

- Clause 4.4 (FSR) – the subject site is not currently not mapped for an FSR development standard. However, under Cl180 of the Housing SEPP a non-discretionary FSR of between 1.75-2.2:1 is applicable to the site and surrounding properties dependent on the distance from the Castle Hill Town Centre.

The concurrent Planning Proposal seeks to introduce an FSR for the site to reflect the concept scheme.



- Clause 4.6 – While Clause 4.6 of The Hills Local Environmental Plan 2019 provides a mechanism to vary certain development standards in circumstances where a development is otherwise permissible, it is not relied upon for the proposed development.

This is because the proposal is being progressed through a concurrent Planning Proposal and State Significant Development (SSD) Application, which provides the appropriate statutory mechanism to consider land-use permissibility, zoning, height, density and built form holistically, having regard to the site's strategic context, proximity to Castle Hill Metro Station and alignment with State housing delivery objectives.

The remaining development standards under Part 4 of The Hills LEP will continue to apply to the subject site.

Other notable requirements of The Hills LEP are considered briefly below:

- Clause 5.10 – Heritage Conservation: The site is not heritage-listed and is not located within a heritage conservation area; however, the EIS will address potential visual relationships with nearby heritage items.
- Clause 7.7 – Design Excellence: Clause 7.7 of *The Hills Local Environmental Plan 2019* applies to development involving the erection of a new building with a height of 25 metres or more. As the proposed development comprises a mid-rise residential flat building exceeding this threshold, the clause is applicable.

In accordance with Clause 7.7, development consent must not be granted unless the consent authority is satisfied that the proposal exhibits design excellence. The Environmental Impact Statement (EIS) will therefore include a comprehensive Urban Design and Architectural Design Report addressing the matters listed under Clause 7.7(4), including built form, massing and modulation, streetscape and public domain outcomes, residential amenity, environmental performance and integration with surrounding development.

The proposal will be informed by a robust design process led by suitably qualified architects and supported by independent design review, consistent with the intent of Clause 7.7 to deliver the highest standard of architectural and urban design in locations accommodating increased building scale.

The remaining requirements under Parts 5 & 7 of The Hills LEP will continue to apply to the subject site.

The EIS will provide a comprehensive justification for the proposed controls, supported by urban design evidence, flood-compatible design, and demonstration of public benefit.

4.11 HILLS DEVELOPMENT CONTROL PLAN 2021

Pursuant to Clause 2.10 of the State Environmental Planning Policy (Planning Systems) 2021, development control plans do not apply to State Significant Development (SSD). Accordingly, the provisions of The Hills Development Control Plan are not statutory requirements for the proposed development.

Notwithstanding this, and consistent with best practice for SSD projects, the proposed development at Nos. 51–57 Castle Street, Castle Hill has been informed by the relevant objectives and planning principles of The Hills DCP to guide built form, residential amenity, landscape outcomes, traffic and access arrangements, and public domain interfaces. These provisions provide an important local context for assessing mid-high rise residential development within the Castle Hill Strategic Centre catchment.

Relevant Parts of the HDCP 2021

Part B – Residential Development

The residential controls within the DCP establish principles relating to:

- residential amenity and liveability;
- building articulation and scale;

- setbacks and interface management;
- communal open space and landscaping; and
- privacy, solar access and acoustic performance.

These principles will inform the detailed design of the proposed residential flat building and will be addressed through the Urban Design Report, Apartment Design Guide (ADG) compliance assessment, and Landscape Design Report accompanying the Environmental Impact Statement (EIS), including:

- apartment layout, mix and internal amenity;
- solar access, daylight and cross-ventilation;
- communal open space provision at podium and/or rooftop levels;
- separation distances and privacy to adjoining residential properties; and
- landscape design responding to the suburban transition context.

While numerical DCP controls (such as setbacks and height limits) are not binding for SSD, their underlying objectives will be used as a reference point in assessing appropriate built-form transitions and residential amenity outcomes.

Part B, Section 5 – Residential Flat Buildings

Part B, Section 5 of The Hills Development Control Plan applies specifically to residential flat buildings and establishes design principles and performance expectations relating to:

- residential amenity and liveability;
- building height, scale and articulation;
- setbacks and transitions to adjoining residential development;
- communal open space and deep soil/landscape outcomes;
- privacy, solar access and acoustic performance; and
- basement design, parking and servicing interfaces.

While Section 5 is not statutory for State Significant Development, its objectives provide a relevant local benchmark for assessing the appropriateness of residential flat building outcomes within established residential areas of Castle Hill.

The proposed development has been informed by the intent of Part B, Section 5 and will address these matters through the Urban Design Report, Apartment Design Guide (ADG) compliance assessment, and Landscape Design Report accompanying the Environmental Impact Statement (EIS), including:

- apartment layout, mix and internal amenity;
- solar access, daylight access and cross-ventilation performance;
- provision and distribution of communal open space at podium and/or rooftop levels;
- building setbacks, articulation and modulation to manage transitions to adjoining lower-density residential areas; and
- landscape design outcomes that contribute to canopy cover, visual relief and urban cooling.

Although the prescriptive numerical standards within Part B, Section 5 (such as height limits, setbacks and landscaped area requirements) do not apply to SSD, the proposal has been designed to respond to their underlying objectives, particularly in relation to built-form transition, residential amenity and neighbourhood compatibility.



Importantly, Part B, Section 5 of The Hills Development Control Plan demonstrates that the local planning framework already contemplates residential flat buildings as an appropriate built form outcome in certain locations within Castle Hill, subject to design quality, amenity and transition considerations. The existence of detailed controls for residential flat buildings reflects an implicit acknowledgement that higher-density residential development forms part of the intended housing mix within the Shire, particularly in accessible, infrastructure-served locations.

In this context, the concurrent Planning Proposal is not introducing an unfamiliar or incompatible development typology. Rather, it represents a logical and orderly progression of the planning framework to align zoning controls with:

- the site's proximity to Castle Hill Metro Station;
- its location within the Castle Hill Strategic Centre catchment;
- the emerging pattern of R4 zoning and residential flat building development on adjoining and nearby land through the Housing SEPP; and
- the design-based assessment approach already embedded within Part B, Section 5 of the DCP.

Accordingly, Part B, Section 5 provides an appropriate local design framework against which the proposed development can be assessed, while the concurrent Planning Proposal ensures that land use permissibility and development standards are brought into alignment with the site's contemporary strategic role and accessibility.

Part C – Parking and Transport

The DCP provides guidance on:

- vehicular access and driveway design;
- parking provision and layout;
- bicycle parking and end-of-trip facilities; and
- pedestrian connectivity.

Although the proposal is not required to strictly comply with DCP parking rates, a Traffic and Transport Impact Assessment will be prepared to support the SSD application, addressing:

- vehicular access from Castle Street;
- basement parking layout and circulation;
- visitor parking provision;
- pedestrian access and universal design; and
- integration with public transport, including Castle Hill Metro Station.

The proposal supports reduced car dependency, consistent with its location within walking distance of high-capacity public transport.

Part D – Environment and Site Management

Relevant DCP principles relating to environmental management will inform the EIS, including:

- stormwater management and water-sensitive urban design (WSUD);
- erosion and sediment control during construction;
- landscape integration and urban heat mitigation; and



- waste management and servicing arrangements.

Stormwater management will incorporate on-site detention and appropriate treatment prior to discharge to Council infrastructure, supported by detailed engineering design.

Public Domain, Safety and Amenity

The concept design has also been informed by DCP principles relating to:

- streetscape presentation and landscaped setbacks;
- passive surveillance and CPTED outcomes;
- pedestrian comfort and safety; and
- accessibility and legibility of building entries.

These matters will be further refined through detailed design and addressed in the EIS.

Application to the SSD Assessment

The Environmental Impact Statement will demonstrate how the proposal responds to, and where appropriate exceeds, the relevant objectives of The Hills DCP, particularly in relation to residential amenity, built-form transition, traffic and access, and landscape outcomes. This approach ensures that, while not bound by prescriptive controls, the proposal delivers a high-quality, locally responsive residential development consistent with the expectations for State Significant Development within the Castle Hill Strategic Centre catchment.

4.12 STRATEGIC PLANNING FRAMEWORK

Strategic and site-specific merit for the proposal will be demonstrated through the concurrent State Significant Development (SSD) application and Planning Proposal documentation forming part of the Environmental Impact Statement (EIS). The proposed development is consistent with the strategic planning framework that guides housing delivery, land use intensification and transport-oriented growth within the north-west metropolitan corridor, particularly within the Castle Hill Strategic Centre and the Sydney Metro Northwest catchment:

- Greater Sydney Region Plan – A Metropolis of Three Cities (2018)
- Central City District Plan
- NSW Housing Strategy 2041
- Future Transport Strategy 2056
- The Hills Local Strategic Planning Statement (LSPS)
- The Hills Local Housing Strategy
- Better Placed – Integrated Design Policy for the Built Environment of NSW
- Crime Prevention Through Environmental Design (CPTED) Principles
- Healthy Urban Development Checklist (NSW Health)

Alignment with State and Regional Strategies

The proposal directly supports the NSW Government's housing delivery and productivity objectives, including those advanced through the Housing Delivery Accord (HDA), by facilitating new housing supply — including affordable housing — within an accessible, infrastructure-rich location serviced by high-capacity public transport.





Under the Central City District Plan, Castle Hill is identified as a Strategic Centre intended to accommodate increased housing diversity, employment opportunities and community services supported by the Sydney Metro Northwest. The subject site's location approximately 650 metres from Castle Hill Metro Station aligns with the District Plan's emphasis on concentrating growth within walking distance of rapid transit to maximise public transport utilisation and reduce car dependence.

The proposal responds directly to the District Planning Priorities relating to:

- Delivering housing supply, choice and affordability in well-located centres;
- Creating liveable, walkable neighbourhoods supported by public transport; and
- Managing growth through density transitions, ensuring compatibility with surrounding residential areas.

Consistency with Local Strategic Planning – The Hills Shire

At the local level, The Hills Local Strategic Planning Statement (LSPS) establishes Castle Hill as a focal point for increased residential density and housing diversity, particularly within the Metro station catchment and adjoining areas capable of supporting intensified development outcomes.

The LSPS explicitly recognises that parts of Castle Hill will transition over time from traditional low- and medium-density residential development toward higher-density residential forms, reflecting population growth, infrastructure investment and evolving housing needs. This is evident in Castle Hill North and areas mapped for increased height and density under the LMR provisions of the Housing SEPP. The subject site is located within this identified transition area, positioned within the LMR mapped areas and land zoned R4 High Density Residential closer to the station core.

The proposal is therefore consistent with the LSPS objectives to:

- facilitate housing intensification in accessible locations;
- deliver a broader mix of dwelling types; and
- manage transitions in scale through design excellence rather than reliance on legacy zoning controls.

The Hills Local Housing Strategy further supports this approach by identifying the Castle Hill Strategic Centre as a key contributor to future housing supply, with particular emphasis on sites within walking distance of the Metro station that can accommodate well-designed apartment development.

Transport and Infrastructure Integration

The proposal is strongly aligned with the Future Transport Strategy 2056, which promotes transit-oriented development around high-capacity public transport infrastructure such as the Sydney Metro Northwest. The site's proximity to Castle Hill Metro Station, combined with access to bus services and the broader strategic road network, supports reduced car dependency and encourages walking, cycling and public transport use.

The proposed development pattern reinforces the significant public investment in the Metro by placing additional residents within easy walking distance of the station, consistent with State objectives to maximise the return on transport infrastructure expenditure.

In summary, the proposed development is consistent with the relevant State and local strategic planning framework by:

- Delivering new housing, including affordable housing, within a Strategic Centre catchment;
- Supporting transit-oriented development within walking distance of Castle Hill Metro Station;
- Responding to the planned transition from medium-density to higher-density residential development;
- Promoting high-quality design, residential amenity and sustainable built-form outcomes; and

- 
- 
- Advancing State housing, transport and infrastructure objectives through an integrated SSD and Planning Proposal pathway.

The Environmental Impact Statement (EIS) will provide further detailed analysis demonstrating consistency with these strategic planning directions and confirming that the proposal represents an orderly, justified and strategically appropriate response to the evolving role of Castle Hill as a major centre within Sydney's north-west growth corridor.

5. Suitability of the Site

5.1 STRATEGIC ALIGNMENT

The proposed development aligns strongly with the strategic planning framework guiding housing delivery, transport-oriented growth and centre-based intensification within Sydney's Central City District and is supported by current NSW Government and The Hills Shire priorities relating to housing supply, affordability and infrastructure investment.

Relevant State and local strategic documents include:

- Greater Sydney Region Plan – *A Metropolis of Three Cities*
- Central City District Plan
- NSW Housing Strategy 2041
- Future Transport Strategy 2056
- The Hills Local Strategic Planning Statement (LSPS)
- The Hills Local Housing Strategy

Collectively, these frameworks emphasise:

- Concentrating higher-density housing within Strategic Centres and public transport catchments
- Leveraging investment in Sydney Metro Northwest to support transit-oriented development
- Delivering a greater diversity of housing types, including affordable housing
- Managing transitions in scale between lower-density neighbourhoods and higher-density centres
- Reducing car dependency and increasing walking, cycling and public transport mode share

Strategic Location and Transport Accessibility

The subject site at Nos. 51–57 Castle Street, Castle Hill is located within the Castle Hill Strategic Centre catchment and approximately 650 metres walking distance from Castle Hill Metro Station. This proximity places the site within a highly accessible, infrastructure-serviced location consistent with State objectives for intensified residential development around high-capacity public transport. This is evident with the LMR provisions of the Housing SEPP.

The site benefits from:

- Direct access to the Sydney Metro Northwest, providing rapid connections to Norwest, Macquarie Park, Chatswood and the Sydney CBD;
- Proximity to the Castle Hill town centre, including retail, commercial, community and civic facilities; and
- Access to local and regional bus services and the surrounding arterial road network.

This level of accessibility supports urban consolidation, reduced car reliance and efficient access to employment, education and services.

Proposed Development and Strategic Response

The proposal seeks approval for a mid-high rise residential flat building of approximately 14-15 storeys, comprising approximately 115 dwellings, including a minimum 15% affordable housing component under the Housing SEPP, supported by basement parking, communal open space, landscaping and associated site infrastructure.

The development supports the objectives of the Housing Delivery Accord (HDA) by facilitating the timely delivery of well-located housing within walking distance of a Metro station, in an area identified for increased residential density and housing diversity.

The proposal contributes to strategic outcomes by:

- Increasing housing supply within the Castle Hill Strategic Centre catchment;
- Delivering new dwellings close to public transport, employment and services;
- Providing affordable housing consistent with the Housing SEPP and HDA objectives;
- Supporting sustainable, low-car living patterns enabled by Metro access; and
- Facilitating a planned transition from medium-density to higher-density residential development.

Alignment with Local Strategic Planning

The Hills Local Strategic Planning Statement identifies Castle Hill as a focal point for housing growth and increased residential density, particularly within walking distance of the Metro station. The LSPS acknowledges that existing zoning and development standards in some locations no longer reflect current accessibility or infrastructure capacity, and that transition toward higher-density residential forms is appropriate over time.

The subject site is positioned within a transition area between the showground precinct and land already zoned R4 High Density Residential closer to the station core. The proposal responds to this context by delivering a mid-high rise built form that increases housing supply while providing appropriate interfaces, setbacks and articulation to surrounding development.

Comparative Zoning and Development Context – Castle Hill Strategic Centre

Location / Site	Zoning	Approx. Distance to Castle Hill Metro	Approved / Emerging Built Form	Strategic Relevance
Subject Site – 51–57 Castle Street	R3 Medium Density Residential (proposed R4)	~650 m	Proposed 14-15-storey residential flat building (SSD / HDA)	Transitional site between low-density residential areas and higher-density station precinct
Land immediately north/ north-east (adjoining precinct)	R4 High Density Residential	~500–700 m	Residential flat buildings and shop-top housing (mid- to high-rise) with no height limit and FSR from 1.2-4.8:1.	Forms part of the Castle Hill North urban release areas
Castle Hill Town Centre core	MU1 Mixed Use / R4 High Density Residential	0–400 m	High-density residential, mixed-use buildings, shop-top housing with heights up to 68m and FSR to 6.5:1	Focus of transport-oriented development around Metro station



Location / Site	Zoning	Approx. Distance to Castle Hill Metro	Approved / Emerging Built Form	Strategic Relevance
Castle Hill Site B	MU1	400m	PP in pre exhibition with heights up to 88m and FSR up to 4.1:1	A Planning proposal less than 200m to the east of the subject site (Castle Towers Kentwell Avenue Site)
Indicative LMR Housing Areas (Housing SEPP)	Indicative LMR	400–800 m	Mid-rise residential outcomes emerging with heights up to 28.6m and FSR to 2.86:1 (subject to affordable housing)	Demonstrates State intent for increased density beyond strict TOD boundaries

Overall, the proposed development is strongly aligned with State and local strategic policies that seek to:

- Deliver well-located housing supply in Strategic Centres;
- Support affordable housing and housing diversity outcomes;
- Maximise the benefits of major public transport investment;
- Concentrate growth in accessible, infrastructure-rich locations; and
- Manage density transitions through high-quality design outcomes.

The proposal therefore represents a strategically justified, orderly and appropriate response to the evolving role of Castle Hill as a key centre within Sydney's north-west growth corridor, and directly advances the objectives of the Housing Delivery Accord and the broader NSW strategic planning framework

5.2 PERMISSIBILITY

Under The Hills Local Environmental Plan 2019 (HLEP 2019), the subject site at No. 51–57 Castle Street, Castle Hill is currently zoned R3 Medium Density Residential. As discussed above, a residential flat building is expressly permitted under CI174 of the Housing SEPP in the R3 zone which removes the jurisdictional hurdle of permissibility. However, the client is willing to alter the zone to R4 High Density Residential within the concurrent Planning Proposal if requested.

5.3 CAPACITY TO ACCOMMODATE FUTURE OCCUPANTS

The subject site comprises a consolidated landholding of approximately 3,230 m² located on the south-western side of Castle Street, Castle Hill, within approximately 650 metres walking distance of Castle Hill Metro Station. The site is of regular configuration, with frontage to Castle Street and sufficient depth to accommodate a mid-high rise residential flat building with appropriate setbacks, landscaped areas and basement servicing.

The land is fully serviced by existing urban infrastructure, including water, sewer, stormwater drainage, electricity and telecommunications. The site is not affected by bushfire-prone land, flooding or other significant natural hazards, and there are no known physical constraints that would prevent redevelopment for residential purposes.





The proposed development has been designed to ensure that the site can comfortably accommodate the anticipated residential population associated with a 14-15-storey residential flat building comprising approximately 115 dwellings, having regard to the following:

- **Basement parking and servicing**, providing resident and visitor parking, bicycle storage and waste facilities without reliance on on-street parking;
- **Communal open space** provided at podium and/or rooftop levels, offering usable outdoor areas for residents supported by landscaping, seating and shade;
- **Apartment layout and orientation** achieving appropriate levels of solar access, daylight and natural ventilation in accordance with the Apartment Design Guide (ADG);
- **Building setbacks, articulation and height modulation** to manage transitions to adjoining lower-density residential development and maintain residential amenity;
- **Safe and legible pedestrian access** from Castle Street, with clear separation between vehicular and pedestrian movements;
- **Efficient internal circulation and building services**, supporting long-term functionality and resident comfort; and
- **Water-sensitive urban design (WSUD)** measures and on-site stormwater management consistent with Council requirements and SEPP (Sustainable Buildings) 2022.

A Traffic and Transport Impact Assessment will accompany the Environmental Impact Statement (EIS) to confirm that Castle Street and the surrounding road network can accommodate the forecast traffic generated by the development, and that parking provision, access arrangements and servicing are appropriate given the site's proximity to the Metro station and local services.

Environmental considerations including acoustic performance, privacy, overshadowing and visual impact will be addressed through the EIS to ensure a high standard of residential amenity and compatibility with the surrounding built environment.

Overall, the site demonstrates strong capacity to support the proposed level of residential development, having regard to:

- its location within the Castle Hill Strategic Centre catchment;
- proximity to high-capacity public transport;
- availability of existing urban infrastructure;
- absence of significant environmental constraints; and
- the opportunity to deliver housing, including affordable housing, in a manner consistent with State and local strategic planning objectives.

The proposal therefore represents an efficient, sustainable and appropriate use of urban land, capable of accommodating future occupants while maintaining residential amenity and supporting the orderly intensification of development within Castle Hill.

5.4 JUSTIFICATION FOR BUILT FORM OUTCOMES

Built Form and Height

The proposed development comprises a mid-high rise residential flat building of approximately 14-15 storeys, facilitated through a concurrent Planning Proposal to amend the baseline height of buildings development standard for the site (currently 9m) and introduce an FSR development standard for the site (no mapped FSR).

The proposed height has been informed by:

- the site's location within approximately 650 metres of Castle Hill Metro Station;
- its position within the Castle Hill Strategic Centre catchment;
- Its presence directly adjacent to an "inner" area under the LMR with a non-discretionary height standard of up to 28.6m (including affordable infill housing "bonus" of 30%);
- Its proximity within 200m of the Castle Towers Kentwell Avenue Site Planning Proposal which is at pre-exhibition stage and proposes a height up to 88m;
- Its proximity within 420m of the Castle Hill Town Centre which has a mapped height of up to 68m;
- Its proximity to the Castle Hill North urban release area which is opposite the site with no established height limit (but FSR of 1.2-4.8:1);
- The scale and number of HDA developments declared by the Minister in the Castle Hill locality.

The concept scheme, including the lift overrun to the roof terrace will require a height of approximately 48m or approximately 45m to the parapet to the top level.

As discussed above, the heights of development within and surrounding the Castle Hill Town Centre are eclectic and inconsistent. Specifically, subject to the gazettal of the Castle Towers Kentwell Avenue Site, which has received Gateway Determination, this site will be the highest mapped building in the area, but it is outside the mapped Castle Hill Town Centre. The Castle Towers Kentwell Avenue site is at Nos. 17-25 Castle Street and is less than 200m to the east of the subject site which will not provide for a consistent transition from the town centre to lower density developments. Rather it provides for heights more akin to transverse waves that will certainly be part of the visual catchment and is a necessary consideration in the height of buildings.

Similarly, the Castle Hill North urban release area is located, in part, directly opposite the subject site, is zoned R4 High Density Residential and does not contain a maximum height limit, but rather incentive FSR ranging from 1.2-4.8:1 which will likely translate into tower forms of development, subject to satisfaction of the relevant Hills LEP requirements. The built form outcome of the Kentwell Avenue and Castle Hill North sites, coupled with the LMR mapped area and other HDA SSD declarations will create a height plane that is certainly greater than anticipated by the height of buildings development standard and does not transition from the town centre. That is, the height of the concept scheme takes its cues from the height of buildings outside the Castle Hill Town Centre.

The proposed height represents a reasonable and proportionate outcome that is consistent with the scale of residential flat buildings emerging within accessible locations across Castle Hill. The height enables efficient use of land close to public transport while remaining significantly below high-rise outcomes associated with metropolitan CBDs or core station precincts.

The built form has been designed to manage transitions through setbacks, articulation and modulation, ensuring that residential amenity and neighbourhood character are appropriately addressed.

An extract of the Surrounding HDA approvals for the site is provided below at **Figure 10**:

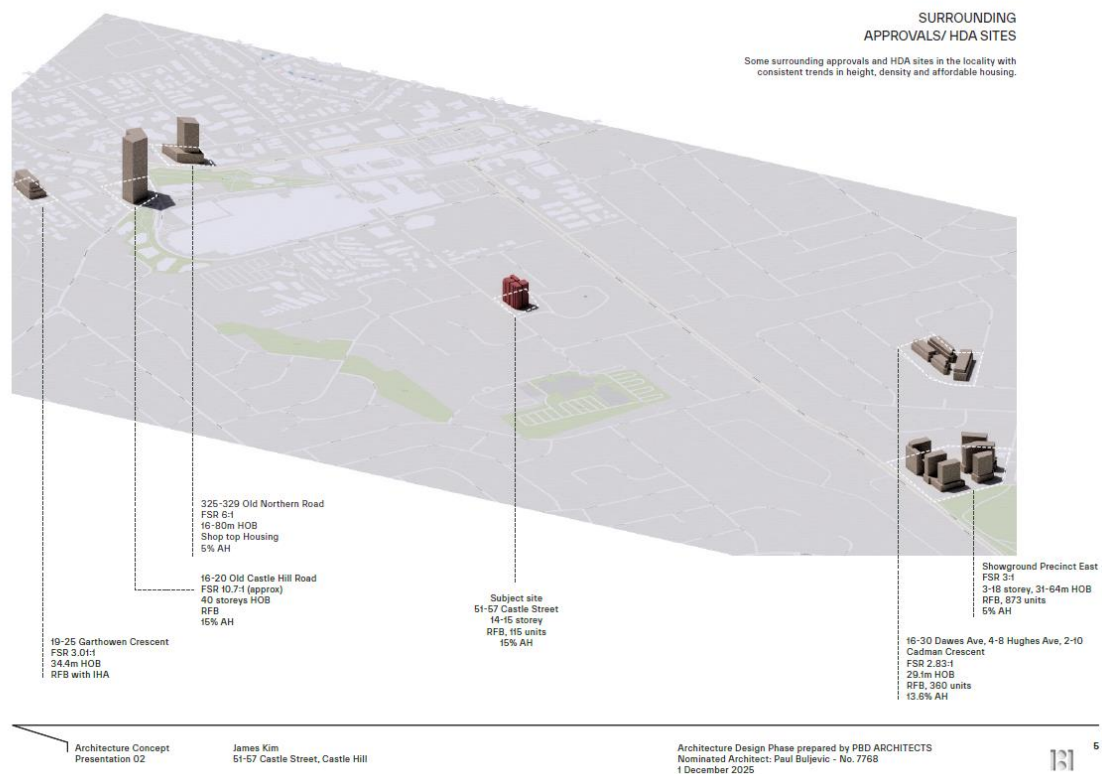


Figure 10 Extract of surrounding approvals (Source PBD Architects)

The context of the above buildings and many others within the Castle Hill locality demonstrate that the Concept Scheme will not be the highest building in the locality, but will sit comfortably amongst other buildings of similar heights. There are a number of factors that support a similar height (and density) being adopted for the subject site, especially given its strategic location, large land holding and ability to deliver much needed housing (including affordable housing). The evolving planning controls for the Castle Hill locality supports greater heights (and densities) within walking distance of the Metro Stations.

The concept design focuses a single tower occupying the site to a height of approximately 48m to the lift overrun. The tower is orientated towards the north to allow district views for north facing occupants and provides a height that is subservient to the Town Centre. The current controls constrain this vision for the site and there are compelling reasons to support an increase in the height of buildings development standard. Importantly, the concept proposal would enable the development of high-quality residential flat building that seeks to meet housing demand in a highly accessible and strategic location. The uplift will allow for the development of diverse residential space to activate the locality and meet the needs of the rapidly ageing community providing accessible housing near existing services, shopping and public transport. These benefits cannot be easily accommodated on other sites which are constrained for a number of reasons and will not be realised if the opportunity is not accepted by Council.

Density and Floor Space

The proposed density is a function of the site's consolidated landholding, accessibility and strategic role, rather than an attempt to maximise yield. The development delivers approximately 115 dwellings, including a minimum 15% affordable housing component, within a single residential building form.

This level of density is informed by:

- the site's location within approximately 650 metres of Castle Hill Metro Station;
- its position within the Castle Hill Strategic Centre catchment;



- Its presence within (or adjacent) to an “inner” area under the LMR with a non-discretionary FSR standard of up to 2.86:1 (including affordable infill housing “bonus” of 30%);
- Its proximity within 200m of the Castle Towers Kentwell Avenue Site Planning Proposal which is at pre-exhibition stage and proposes an FSR of up to 4.1:1;
- Its proximity within 420m of the Castle Hill Town Centre which has a mapped FSR up to 6.5:1;
- Its proximity to the Castle Hill North urban release area which is opposite the site with an incentive FSR of 1.2-4.8:1;
- The scale and number of HDA developments declared by the Minister in the Castle Hill locality as detailed in Figure 10 (above).

The concept scheme will require an FSR of approximately 4.1:1.

As discussed above, the FSR of development within and surrounding the Castle Hill Town Centre are eclectic and inconsistent. Specifically, subject to the gazettal of the Castle Towers Kentwell Avenue Site, which has received Gateway Determination, this site will be consistent with the FSR sought by the concept scheme and is certainly less than the maximum FSRs contemplated within the Castle Hill Town Centre and the Castle Hill North urban release area which is opposite the site. The Castle Towers Kentwell Avenue site is at Nos. 17-25 Castle Street and is less than 200m to the east of the subject site which will not provide for a consistent transition from the town centre to lower density developments.

The built form outcome of the Kentwell Avenue and Castle Hill North sites, coupled with the LMR mapped area and other HDA SSD declarations will create an eclectic pattern of FSR which does not transition from the town centre. That is, the FSR of the concept scheme takes its cues from the FSR from all development within and surrounding the Castle Hill Town Centre.

Having regard to the subdivision pattern, constraints and allotment sizes on surrounding properties, it is apparent that there are limited opportunities for a development of the scale proposed in the concept scheme that is accompanied by the suite of planning benefits it will deliver. The proposed uplift in the FSR (and height) development standards will deliver an appropriate density and built form within walking distance of Castle Hill Town Centre and Metro Station. The increased residential floor space will provide for more housing with a designed growth and strategic centre and will seek to meet the needs of Castle Hill's diverse and aging population providing housing that is accessible, near public transport, open space, shopping and other services. In addition, the concept scheme provides for affordable housing to house key workers in the locality in accordance with the Housing SEPP.

The current planning controls constrain this vision for the site and there are compelling reasons to support an increase in the FSR development standard. Importantly, the concept proposal would enable the development of high quality residential flat building that seeks to meet housing demand in a highly accessible and strategic location. These benefits cannot be easily accommodated on other sites which are constrained for a number of reasons and will not be realised if the opportunity is not accepted by Council.

Planning Proposal Role

Importantly, the proposed scale and density are not being pursued as exceptions to development standards, but rather through a rezoning process that aligns land use permissibility and development capacity with contemporary strategic planning objectives. We would invite discussion with the Department on the envisaged height and density development standards. Specifically, it is open to the applicant to undertake a Planning Proposal seeking the maximum height and FSR required by the concept scheme and then “turning off” the infill affordable housing “bonuses” under the Housing SEPP. Alternatively, seek lower “base” heights and FSRs that will allow the infill affordable housing “bonuses” to achieve the required height and density of the concept scheme.



The proposed height and density are appropriate for the site given the eclectic nature of development within and surrounding the Castle Hill Town Centre. The concept proposal will support the delivery of well-located housing in proximity to high-capacity public transport.



6. Environmental and Site Constraints

The Environmental Impact Statement (EIS) will assess the potential environmental impacts of the proposed mid-high rise residential flat building at Nos. 51–57 Castle Street, Castle Hill. The site is located within a fully serviced suburban environment and is not subject to complex environmental constraints. Key considerations relate to residential amenity, traffic and access, infrastructure servicing, built-form transitions and construction impacts, all of which can be appropriately addressed through standard mitigation measures.

Specialist consultants will be engaged to prepare technical studies proportionate to the scale and nature of the development, as summarised below.

6.1 LANDFORM, GEOTECHNICAL AND ACID SULFATE SOILS

The site comprises a consolidated landholding with a moderate slope consistent with the surrounding Castle Hill locality. There are no unusual topographic features that would constrain development.

A Geotechnical Investigation will be prepared to confirm subsurface conditions, basement excavation feasibility and foundation design. The investigation will inform appropriate construction methodologies and retaining systems.

The site is not identified as being affected by acid sulfate soils under The Hills Local Environmental Plan 2019 mapping. Notwithstanding this, the geotechnical investigation will confirm soil conditions and address any management measures required during excavation, if applicable.

6.2 CONTAMINATION AND SITE HISTORY

The site is currently occupied by detached residential dwellings and has a history of residential use. A Preliminary Site Investigation (PSI) will be undertaken in accordance with SEPP (Resilience and Hazards) 2021 to confirm the absence of contamination or identify any potential contamination typically associated with residential uses (e.g. asbestos-containing materials).

If required, remediation measures will be identified and addressed through standard construction management procedures. The EIS will confirm that the site is, or can be made, suitable for residential occupation.

6.3 NOISE AND VIBRATION

The site is located within a residential environment and is subject primarily to local road traffic noise from Castle Street.

An Acoustic Assessment will be prepared to address:

- traffic noise impacts and appropriate façade attenuation measures;
- internal acoustic amenity in accordance with AS 2107 and relevant SEPP requirements; and
- construction noise and vibration management in accordance with the EPA Interim Construction Noise Guideline.

Mitigation measures will include appropriate building design, glazing specification and construction management controls.

6.4 SITE ISOLATION

The subject site at Nos. 51-57 Castle Street will not result in any isolated lots. Whilst the site at No. 59 Castle Street would appear to be isolated it is not given its size and frontage width. The adjoining site is capable of redevelopment as multi-dwelling housing which requires a minimum site area of 600sqm and lot width of 12m. This is permitted under cl172 of the Housing SEPP.

Alternative, the adjoining site can also redevelop as a residential flat building (within the outer area) given cl178 of the Housing SEPP specifically states in the R3 and R4 zones minimum lot sizes and widths under other planning controls do not apply. As such, the redevelopment of No. 59 Castle Street can reach a development potential under cl180 of 17.5m (height) and 1.5:1 (FSR) and then with the possibility of adding 30% infill affordable housing “bonus” on top of these requirements. That is, No. 59 Castle Street is not an isolated site.

6.5 OVERSHADOWING, SOLAR ACCESS AND WIND

A Solar Access and Overshadowing Analysis will be prepared to demonstrate compliance with the Apartment Design Guide (ADG) and to assess impacts on adjoining residential properties and communal open space.

Given the scale of the concept scheme, wind impacts are expected to be limited. A qualitative wind assessment will inform building articulation, balcony design and landscape treatments to maintain comfortable conditions within communal and pedestrian areas.

6.6 TRAFFIC, ACCESS AND PARKING

A Traffic and Transport Impact Assessment will assess the capacity of Castle Street and the surrounding local road network to accommodate the proposed development.

Key matters to be addressed include:

- vehicular access location and driveway design;
- on-site parking provision for residents and visitors;
- bicycle parking and end-of-trip facilities;
- pedestrian safety and accessibility; and
- construction traffic management.

Given the site’s proximity to Castle Hill Metro Station (approximately 650m), the development supports reduced car dependence and increased public transport use.

6.7 STORMWATER MANAGEMENT

The site is not flood affected. Stormwater will be managed through on-site detention (OSD) and water-sensitive urban design (WSUD) measures consistent with The Hills Development Control Plan and Council engineering requirements.

A Stormwater Management Plan will demonstrate that post-development runoff does not exceed pre-development conditions and that water quality objectives are achieved.

6.8 UTILITIES AND INFRASTRUCTURE SERVICING

The site is fully serviced by existing urban infrastructure, including:

- water and sewer;
- electricity;

- telecommunications and NBN; and
- stormwater drainage.

A Services and Infrastructure Report will confirm that existing networks have sufficient capacity to support the proposed development, with no significant augmentation works anticipated beyond standard connections.

6.9 BUILT-FORM, VISUAL AND HERITAGE CONTEXT

A Built Form and Visual Impact Assessment will consider the proposal's relationship to the surrounding residential context, including:

- scale and massing transitions to surrounding development;
- setbacks, articulation and modulation;
- streetscape presentation along Castle Street; and
- overall visual integration within the Castle Hill Strategic Centre catchment.

The site is not heritage-listed and is not located within a heritage conservation area. A heritage impact assessment is not anticipated to be required. The EIS will confirm that the proposal does not adversely affect any nearby heritage items

6.10 SUSTAINABILITY AND BUILDING PERFORMANCE

A Sustainability Report will demonstrate compliance with SEPP (Sustainable Buildings) 2022, addressing:

- BASIX energy and water performance;
- passive design and building envelope efficiency;
- water-efficient fixtures and WSUD measures; and
- opportunities to reduce urban heat through landscaping and material selection.

6.11 SOCIAL, ECONOMIC AND AMENITY CONSIDERATIONS

A Social Impact Assessment, proportionate to the scale of the development, will consider:

- contribution to housing supply and diversity;
- delivery of affordable housing;
- residential amenity outcomes; and
- integration with the surrounding community.

Residential amenity matters including privacy, daylight access, acoustic performance and communal open space quality will be addressed through the design and assessed in the EIS.

6.12 CONSTRUCTION AND ENVIRONMENTAL MANAGEMENT

A Construction Environmental Management Plan (CEMP) will be prepared to address:

- erosion and sediment control;
- dust and noise management;

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- waste minimisation and recycling;
 - construction traffic and pedestrian safety; and
 - site management and compliance.

Preliminary investigations indicate that the Castle Street site presents no significant environmental constraints that would preclude redevelopment for a residential flat building. The EIS will incorporate the above specialist assessments to ensure that potential impacts are appropriately identified, mitigated and managed through design, construction and operation.

7. SUMMARY OF PLANNING MERIT

7.1 STRATEGIC MERIT

Clearly, the subjects sites proximity to the Castle Hill Town Centre and Metro Station has strategic merit to provide for additional housing and jobs in an appropriate location. This is reflected by the sites mapping within the LMR zone. The concept scheme seeks to provide a building with a height and density that is compatible with other similar typologies within the Castle Hill locality and will not appear visually jarring or isolated. This additional height and FSR of the concept scheme will deliver additional housing, including affordable housing, short term construction jobs and public benefits. This Scoping Report is therefore consistent with the following documents:

- *A Metropolis of 3 Cities: The Greater Sydney Region Plan* and the Central City District Plan;
- NSW Housing Strategy 2041
- Future Transport Strategy 2056
- The Hills Local Strategic Planning Statement (LSPS)
- The Hills Local Housing Strategy
- Better Placed – Integrated Design Policy for the Built Environment of NSW
- Crime Prevention Through Environmental Design (CPTED) Principles
- Healthy Urban Development Checklist (NSW Health)
- The relevant SEPPs and Ministerial Directions.

This Scoping Report demonstrates the Concept scheme is consistent with the above documents as it provides a residential flat building that incorporates additional housing supply, including affordable housing, in a highly accessible and strategic location. That is, the Concept proposal will provide additional housing next to an existing commercial centre in a highly accessible location. The site is in single ownership and “shovel ready” that will provide the catalyst for the revisitation of the locality and provide a transit orientated development due to the excellent access to public transport.

The Scoping Report is a response to the disconnect between the current height and FSR development standards and provides for an envelope that seeks to achieve the strategic and site specific goals of the site. The Concept scheme has significant strategic merit because of its location within the mapped LMR area but also because of its consistency with relevant policies of the Greater Sydney Regional Plan and the Central City District Plan, SEPPs and Ministerial Directions. These will be discussed within the EIS.

7.2 SITE-SPECIFIC MERIT

In order to demonstrate site specific merit, this Scoping Report must identify the potential impacts of the uplift and consider mitigation measures and justification. As noted above, the site is largely “unconstrained” and insisting on full compliance with the current planning controls (including the Housing SEPP) represents a lost opportunity to enhance development potential in an ideal location in walking distance to Castle Hill Town Centre and Metro Station.

The proposed uplift to the height and FSR development standards will not impact or restrict the existing or future development of surrounding properties given the location, similar LMR zoning and orientation of the site. Whilst increasing the density on-site, the concept scheme will facilitate a redevelopment option that aligns or is compatible with the context and setting established by the Castle Hill Strategic Centre, various Planning Proposals and the LMR mapping under the Housing SEPP. The site is serviced by all essential infrastructure and is “shovel ready”. The site is



located within 650m of Castle Hill Metro Station and allows for a highly accessible and affordable development which can support the additional height and density proposed.

In summary, the site specific merit of the proposal includes the following:

- The site is located in a highly accessible location and is within close proximity to Castle Hill Town Centre and Metro Station with provides a variety of uses including commercial, religious, educational and healthcare facilities, amongst others.
- The site contains numerous characteristics which also enable site-specific merit. This includes the following:
 - It is within a highly accessible and strategic location (as noted above);
 - A considerable site area of 3,233m², representing one of the largest allotments in the Castle Hill locality in single ownership;
 - Expansive frontages to north facing Castle Street to enhance residential amenity;
 - Open space provided in various locations on the site to maximise solar access and enhance open space and linkages.
- The increase to the height and FSR will allow for an innovative and flexible design, site arrangement and built form. This will enable superior urban design and architectural outcomes, such as;
 - Improved presentation to Castle Street at multiple scales and greater visual interest;
 - Distribution of massing through building arrangement, whilst delivering an increase in density in a highly strategic location;
 - Allowing for a building height (approximately 48m) which will be lower and subservient of other buildings closer to the Castle Hill Town Centre including the Castle Towers Kentwell Avenue Site;
 - Provision of habitable uses at ground level for surveillance of the public domain surrounded by accessible open space;
 - Improvements to public safety and amenity by orientating dwellings orientated towards Castle Street;
 - Opportunity to deliver greater housing diversity and supply, including affordable housing, within an accessible location, in a desirable LGA; and
 - Opportunity to deliver additional short term construction jobs close to homes and existing commercial centres.



8. Conclusion

This Scoping Report has been prepared to support a request for the issue of Secretary's Environmental Assessment Requirements (SEARs) to guide the preparation of an Environmental Impact Statement (EIS) for a State Significant Development Application (SSDA) and concurrent Planning Proposal for land at Nos. 51–57 Castle Street, Castle Hill.

The proposed development seeks approval for a residential flat building of approximately 14-15 storeys, comprising approximately 115 dwellings, including a minimum 15% affordable housing component under the Housing SEPP, supported by basement parking, communal open space, landscaping and associated site infrastructure works. The proposal is intended to deliver a high-quality residential outcome that responds to its suburban context while contributing meaningfully to housing supply within walking distance of Castle Hill Metro Station.

The site seeks an uplift to height and FSR development standards which will be advanced through a concurrent Planning Proposal. This Planning Proposal will demonstrate the concept scheme is consistent with adjoining and nearby zoning, emerging development patterns within the Castle Hill Strategic Centre catchment, and State and local strategic planning directions following the delivery of the Sydney Metro Northwest.

The proposal has been reviewed by the NSW Housing Delivery Authority (HDA) and declared State Significant Development (SSD) by the Minister for Planning under section 4.36(3) of the Environmental Planning and Assessment Act 1979, confirming that the project aligns with Government priorities for accelerated housing delivery, including the provision of affordable housing in accessible, infrastructure-serviced locations.

The SSD and concurrent Planning Proposal pathway provides an appropriate and transparent mechanism for the coordinated assessment of:

- built form, scale and residential amenity;
- traffic, access and infrastructure capacity;
- environmental performance and sustainability; and
- public benefits, including affordable housing delivery.

This Scoping Report supports the request for SEARs to guide preparation of a proportionate EIS that will address all relevant environmental, technical and planning matters, including (but not limited to):

- strategic merit and uplift justification;
- urban design quality and built-form transitions;
- traffic, parking and access;
- residential amenity, including acoustic performance, privacy and solar access;
- stormwater management and infrastructure servicing;
- environmental sustainability and building performance; and
- social and economic impacts.

The proposed development is consistent with the Greater Sydney Region Plan – A Metropolis of Three Cities, the Central City District Plan, the NSW Housing Strategy 2041, and The Hills Local Strategic Planning Statement, which collectively support increased housing supply and diversity within Strategic Centres and within walking distance of high-capacity public transport.



Accordingly, Planning Ingenuity, on behalf of the proponent, respectfully requests that the Planning Secretary issue Secretary's Environmental Assessment Requirements to enable preparation and lodgement of an Environmental Impact Statement for the proposed State Significant Development and concurrent Planning Proposal at Nos. 51–57 Castle Street, Castle Hill.