



Environmental Impact Statement

Mixed Use Development – Early Works

16-20 Old Castle Hill Road, Castle Hill

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

SSD-86460458

Prepared by Colliers Urban Planning

12 February 2026 | 2240250



'Gura Bulga'

Liz Belanjee Cameron

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



'Dagura Buumarri'

Liz Belanjee Cameron

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



'Gadalung Djarri'

Liz Belanjee Cameron

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

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

We pay our respects to their Elders past and present.

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

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12 February 2026

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12 February 2026

Version No.	Date of issue	Prepared by	Approved by
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B. Demolition and Excavation Plans	Studio SC
C. Statutory Compliance Table	Colliers Urban Planning
D. Community Engagement Report	Sarah George Consulting
E. Mitigation Measures Table	Colliers Urban Planning
F. Survey Plan	SDG
G. Arboricultural Report	Arbor Express
H. Geotechnical Investigation Report	Douglas Partners
I. Preliminary Site Investigation	Foundation Earth Sciences
J. Detailed Site Investigation	Foundation Earth Sciences
K. Remediation Action Plan	Foundation Earth Sciences
L. Construction Environmental Management Plan	Foundation Earth Sciences
M. BDAR Waiver	Department of Planning, Housing and Infrastructure
N. Preliminary Acid Sulfate Soil Assessment	Foundation Earth Sciences
O. Preliminary Hazardous Materials Assessment	Foundation Earth Sciences
P. Groundwater Impact Assessment	Douglas Partners
Q. Transport Impact Assessment	Stantec
R. Noise and Vibration Impact Assessment	RWDI Australia
S. Construction and Demolition Waste Management Plan	Elephants Foot
T. Flood Impact and Risk Assessment	BG&E

U. Aboriginal Cultural Heritage Assessment Report	Regal Heritage
V. Salinity Assessment	Foundation Earth Sciences
W. Erosion and Sediment Control Plans	BG&E
X. Estimated Development Cost Report	Construction Consultants

Signed Declaration

Project Details	
Project Name	16-20 Old Castle Hill Road – Mixed Use Development
Application Number	SSD-86460458
Land to be Developed	16-20 Old Castle Hill Road, Castle Hill identified as Lot 10-11 DP 881332, Lot 20 DP 222257, Lot 1 DP 204335
Applicant Details	
Applicant Name	UPG Castle Corner Pty Ltd
Applicant Address	Suite 110, Level 1, 180-186 Burwood Road, Burwood NSW 2134
Prepared by	
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Qualifications	BPlan
Address	Level 4, 180 George Street, Sydney NSW 2000
Declaration	
Name	Michael Oliver
Qualifications	Bachelor of Planning (Class 1), Master of Environmental Law, Registered Planner
Registration Number	40820
Organisation Registered With	Planning Institute of Australia
The undersigned declares that this EIS: • has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.	
Signature	

Summary

Overview

This Environmental Impact Statement has been prepared on behalf of UPG Castle Corner Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) identified as SSD-86460458. This application responds to the proposal being identified for accelerated and state significant assessment by the Housing Delivery Authority. The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for the proposed early works required for a residential development including affordable housing on land at 16-20 Old Castle Hill Road, Castle Hill (the site).

The site was declared State Significant Development (SSD) pursuant to State Significant Declaration Order 2025 (the Order) issued on 13 May 2025. The Order establishes specified development on specific land to be declared SSD for the purposes of the *Environmental Planning & Assessment Act 1979* (EP&A Act). The Order states development specified in EOI application 240857 dated 23 February 2025, including development for the purpose of residential flat building with provision of affordable housing at 16-20 Old Castle Hill Road as identified in Schedule (1)(d), is declared to be SSD.

Unlike development declared as SSD via a SEPP, development identified as SSD via a Ministerial Order does not require an estimated development cost threshold to be met. Rather, it declares state significance for the development described in the relevant HDA application. Therefore, the early works component of the residential development identified in the HDA EOI is of state significance.

On 2 July 2025, the DPHI issued industry-specific SEARs for the project (SSD-86460458), described as:

'Early works including:

- *Site establishment*
- *Establishment works and construction activities*
- *Bulk excavation*
- *Infrastructure services coordination and deviation*
- *Erosion and sediment control*
- *Removal of trees'*

The future associated SSDA (SSD-85238209) with concurrent rezoning will seek consent for building works and an amendment to The Hills Local Environmental Plan 2019 (The Hills LEP 2019) to accommodate the building.

Analysis of Alternatives

During the design process of the proposed development, feasible alternative options for the site were explored. This included the following:

- **Do Nothing** – Leave the site as it currently exists, where the site remains under-utilised and does not contribute to the strategic vision of the Castle Hill North precinct.
- **Use of the site for an Alternative Purpose** – Considering the current demand for housing in well-located areas close to public transport, delaying the development or utilising the site for an alternative use is contrary to the housing delivery objectives of the state and federal governments. Delaying the Early Works SSDA would likely result in not meeting the timeframe for lodgement of the main works SSDA under the HDA pathway.
- **The Proposed Development** - The proposed development represents the most suitable and appropriate pathway to achieve the strategic priorities of the HDA and National Housing Accord targets. The proposed Early Works will facilitate the timely delivery of housing on the site and in turn contribute to housing growth within Castle Hill and The Hills LGA.

As such, it was determined that the feasible alternative options for the site do not represent the highest and best use nor the best overall outcome when compared against the proposed development.

Environmental Impacts and Mitigation Measures

This EIS provides an assessment of the environmental impacts of the Proposal in accordance with the issued SEARs (refer to **Appendix A**), and sets out the undertakings made by the applicant to manage and minimise potential impacts arising from the development. Key potential environmental impacts of the Proposal include:

- **Contamination and Remediation** – A Preliminary Site Investigation (PSI) (**Appendix I**), Detailed Site Investigation (DSI) (**Appendix J**) and Remediation Action Plan (RAP) (**Appendix K**) have been prepared by Foundation Earth Sciences Pty Ltd. The investigations confirm that the site can be made suitable for the proposed high-density residential development, subject to full implementation of the RAP. The remediation works recommended by this RAP will be undertaken as part of the Early Works package proposed in this EIS.
- **Hazardous Materials** – A Preliminary Hazardous Materials Assessment has been prepared by Foundation Earth Sciences and is included at **Appendix O**. The report recommends controlled removal and disposal of all identified hazardous materials by appropriately licensed contractors. Subject to implementation of these measures and confirmation of clearance prior to construction, the site is considered suitable for demolition and subsequent redevelopment.
- **Geotechnical** – A Geotechnical Investigation has been undertaken by Douglas Partners and is provided at **Appendix H**. The geotechnical conditions are considered suitable for the proposed development, provided the recommended excavation support, groundwater management, vibration control and foundation design measures are implemented. No specific acid sulphate soil or salinity management plans are required. With the proposed mitigation strategies in place, geotechnical impacts are expected to be manageable and acceptable in the context of the SSDA.
- **Groundwater** – A Groundwater Impact Assessment has been prepared by Douglas Partners at **Appendix P**. The assessment concludes that a drained basement can be constructed and operated without significant impacts on surrounding groundwater systems or nearby structures, provided the recommended management measures are implemented. Predicted inflows under base case conditions are below 3 ML/year, likely avoiding the need for a Water Access Licence, and sensitivity case inflows remain within NSW AIP Level 1 minimal impact criteria.
- **Acid Sulfate Soils** – A Preliminary Acid Sulfate Soil (ASS) Assessment has been prepared by Foundation Earth Sciences and is provided at **Appendix N**. The report concludes the site is not impacted by Actual or Potential Acid Sulphate Soils to the depths investigated and that no Acid Sulphate Soil Management Plan or further ASS investigations are required.
- **Tree Removal and Arboricultural Assessment** – An Arboricultural Impact Assessment has been prepared by Arbor Express and is provided at **Appendix G**. A total of 99 trees were recorded, and 75 are proposed to be removed to accommodate the development footprint, including several species exempt under Council controls. No major encroachments into TPZs or SRZs are predicted, and the moderate encroachments are considered acceptable given existing hard surfaces and the high vitality of affected trees. The assessment concludes that, while substantial tree removal is required, the retained trees can be adequately protected and that residual impacts are minimal and manageable with the recommended controls and ongoing arborist oversight.

A complete assessment of each issue identified within the issued SEARs is provided in **Section 6.0**. A consolidation of mitigation measures proposed is provided at **Appendix E**.

Conclusion and Justification

Having regard to environmental, economic, and social considerations, the carrying out of the Proposal is justified for the following reasons:

- The State Significant Development Declaration Order 2025 (No 7) dated 13 May 2025 declared the project as State Significant Development under the *Environmental Planning and Assessment Act 1979*. The proposed development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including The Hills LEP 2019 and relevant State Environmental Planning Policies.
- The proposed SSDA forms part of the enabling works for the Ministerial declared HDA site under SSD-85238209 (SEARS issued 10 June 2025), which will result in the construction of new high-density dwellings close to transport and essential services. The proposed demolition, remediation and excavation works will ensure the expedient delivery of the HDA application at the site (SSD-86460458) which must be lodged within 9 months, as per the requirements of the HDA approval pathway.

- The early works will facilitate the redevelopment of the site for high density residential purposes, which will deliver important social and economic benefits to the community by contributing to housing diversity in a highly accessible location in proximity to existing services and public open space.
- The early works will facilitate a development that directly responds to the strategic vision and objectives for the delivery of additional housing supply, stated in such documents as the National Housing Accord 2022, Housing 2041, the Greater Sydney Region Plan and Central City District Plan, and Council's Local Strategic Planning Statement and Local Housing Strategy.
- The assessment of the proposed early works has demonstrated that they will not result in any unreasonable environmental impacts that cannot be appropriately managed consistent with the relevant planning controls for the site.
- Supporting technical studies which accompany this SSDA demonstrate that the environmental impacts associated with the early works are acceptable and will not give rise to any adverse impacts.
- The proposed development is suitable for the site and in the public interest.

1.0 Introduction

This Environmental Impact Statement (EIS) has been prepared on behalf of UPG Castle Corner Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) identified as SSD-86460458. The EIS is submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for Early Works development activities in facilitating a proposed mixed use development and concurrent rezoning identified by the Housing Delivery Authority for accelerated state-significant assessment. The substance of the proposed development is subject to a separate SSDA (SSD-85238209). For ease of reference, this application will be referred to as the 'Early Works SSDA', and the future, separate application (for buildings) will be referred to as the 'Main Works SSDA'.

The Early Works include site establishment, tree removal, bulk excavation, infrastructure services augmentation and ancillary site works on land at 16-20 Old Castle Hill Road, Castle Hill (the site).

The site was declared State Significant Development (SSD) pursuant to State Significant Declaration Order 2025 (the Order) issued on 13 May 2025. The Order establishes specified development on specific land to be declared SSD for the purposes of the *Environmental Planning & Assessment Act 1979* (EP&A Act). The Order states development specified in EOI application 240857 dated 23 February 2025, including development for the purpose of residential flat building with provision of affordable housing at 16-20 Old Castle Hill Road as identified in Schedule (1)(d), is declared to be SSD.

Unlike development declared as SSD via a SEPP, development identified as SSD via a Ministerial Order does not require an estimated development cost threshold to be met. Rather, it declares state significance for the development described in the relevant HDA application. Therefore, the early works component of the residential development identified in the HDA EOI is of state significance.

On 2 July 2025, DPHI issued industry-specific SEARs for the project (SSD-86460458), described as:

'Early works including:

- *Site establishment*
- *Establishment works and construction activities*
- *Bulk excavation*
- *Infrastructure services coordination and deviation*
- *Erosion and sediment control*
- *Removal of trees'*

The future associated SSDA (SSD-85238209) with concurrent rezoning will seek consent for building works and an amendment to The Hills Local Environmental Plan 2019 (The Hills LEP 2019) to accommodate the building.

This EIS is based on the Demolition and Excavation Drawings prepared by StudioSC (see **Appendix B**) and other supporting technical information appended to the report (see Table of Contents).

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, clause 175 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation), and the issued SEARs. A SEARs Compliance Table provided at **Appendix A** that identifies where the SEARs have been addressed in this EIS. This EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report. The EIS intends to inform the community and stakeholders about the Proposal, including its social, economic and environmental impacts, mitigation measures and benefits, as well as providing an environmental assessment of the proposal.

1.1 The Applicant

The Applicant’s details are presented in **Table 1** below.

Table 1 *Applicant Details*

Applicant:	UPG Castle Corner Pty Ltd
Address:	Suite 110, Level 1, 180-186 Burwood Road, Burwood NSW 2134
ABN:	80 055 722 444

1.2 Overview of Proposed Development

The SSDA seeks consent for the following Early Works that will facilitate the future mixed-use development. Specifically, this SSDA seeks approval for Early Works that are consistent with the development as described within the request for SEARs:

- Site establishment;
- Establishment works and construction activities;
- Bulk excavation and remediation;
- Infrastructure services coordination and deviation;
- Erosion and sediment control; and
- Removal of trees.

This EIS provides further description of the proposal in **Section 3.0**. The proposal will be undertaken in accordance with the Demolition and Excavation Plans prepared by StudioSC (**Appendix B**).

1.3 Objectives of the Development

The objectives of the proposed development are to:

- Facilitate Early Works at the site to enable future development (subject to separate SSDA, SSD-85238209) for the supply of housing, including affordable housing, on the site as part of a mixed use development;
- Facilitate the orderly and efficient renewal of a large parcel of land in Castle Hill;
- Facilitate a future development that will deliver a diverse mix of dwellings that will enjoy excellent amenity, taking advantage of the site’s strategic location, proximity to services and employment opportunities;
- Facilitate the future development of a high-quality built outcome in terms of amenity, open space, deep soil and sustainability; and
- Facilitate expedited delivery of housing within the Housing Accord period by allowing enabling works to commence prior to consent for the Main Works.

1.4 Background

1.4.1 Prior Application

Prior to the inauguration of the HDA pathway, a related alternative development utilising the infill affordable housing bonus was progressed by the applicant through the preliminary stages.

On 30 January 2025, SEARs were granted for a *‘Residential development comprising a 23 storey building providing 194 apartments (including 29 affordable) with basement car parking’* at 16-20 Old Castle Hill Road, Castle Hill (SSD-74239777). The proposed development qualified as SSD under the in-fill affordable housing pathway, having an estimated cost of more than \$75 million.

The application was withdrawn on 3 July upon SEARs being obtained for the Early and Main Works SSDAs.

1.4.2 Restrictions or Covenants

A Survey Plan is provided at **Appendix F**, identifying the restrictions and covenants that apply to the subject lots. The sole easement on the site relates to an area reserved for acquisition for the purposes of a road upgrade to Old Castle Hill Road and McMullen Avenue.

1.4.3 Housing Delivery Authority and National Housing Accord

The NSW State Government has agreed to a National Housing Accord (Accord) with other states and territories, local government, institutional investors and the construction sector. The Accord includes an initial aspirational target agreed by all parties to build 1.2 million new well-located homes over 5 years from mid-2024. NSW has a target to deliver 377,000 new homes over five years by July 2029 under the National Housing Accord.

To accelerate the delivery of much needed homes and help meet NSW's target under the Accord, the NSW Government established the Housing Delivery Authority (HDA).

The HDA offers a clear planning pathway for large residential and mixed-use developments to be assessed as state significant development and state significant development with a concurrent rezoning. This process aims to improve consistency in planning decisions and speed up assessment, without sacrificing housing quality.

This project was nominated as State Significant Development under the HDA, also allowing for a concurrent rezoning to facilitate the intended development. This Early Works SSDA comprises the first part of the project declared SSD. The proposed demolition, remediation, excavation and other enabling works form part of an early works package required to ensure the site can support the proposed mixed-use development at the site and that housing can be delivered in an expedient manner.

1.4.4 Relationship between Early and Main Works

The proposed Early Works form part of a staged approach to the redevelopment of the site and are intrinsically linked to a separate SSDA for the Main Works (SSD-85238209). The Main Works SSDA seeks consent for the redevelopment of the site for a high-density mixed-use development, comprising a residential flat building with provision of affordable housing, ground floor retail uses, basement car parking, public domain improvements and associated landscaping works.

The Main Works SSDA also includes a concurrent rezoning under the HDA pathway to amend the applicable planning controls to facilitate the proposed scale and form of development. That application will address the detailed built form, urban design, residential amenity, traffic and transport, social impacts and operational matters associated with the completed development.

The Early Works SSDA is limited in scope to enabling works only and does not seek approval for any above-ground building works or residential uses. The Early Works comprise demolition, remediation, bulk excavation, tree removal, infrastructure service coordination and associated civil works required to prepare the site for the future development. These works are necessary to ensure the site is physically and environmentally suitable for the Main Works development and to allow construction of the basement and foundations once consent is granted for the Main Works SSDA.

While assessed separately, the Early Works and Main Works SSDAs form part of a single, integrated development outcome that has been declared SSD. The Early Works will not prejudice the assessment of the Main Works SSDA, nor predetermine the final built form or design. Rather, they facilitate an orderly, efficient and timely redevelopment of the site by allowing enabling works to commence prior to determination of the Main Works application, consistent with the objectives of the HDA to accelerate housing delivery.

2.0 Strategic Context

This section identifies key strategic matters relevant to the assessment of the proposal, including the site's features, context, strategic context and other development in the surrounding area. This section also provides an analysis of feasible alternatives that were considered in light of the proposal's objectives.

2.1 Site Location and Context

The site is situated at 16-20 Old Castle Hill Road, Castle Hill, within The Hills Local Government Area (LGA). The traditional owners of the land are the Bidjigal people of the Dharug Nation. It is well located, being approximately 250m from Castle Hill Metro Station which provides services to Rouse Hill, Macquarie Park, Chatswood and the Sydney CBD. It is equally proximate to Castle Towers shopping centre, a major regional retail hub. The site has ready access to public open space being less than 100m from Arthur Whitling Park and Eric Fenton Reserve.

Existing development on the site consists of two detached residential dwellings with a moderate amount of vegetation. This area of Castle Hill is currently undergoing substantial development intensification with the introduction of residential flat buildings and mixed-use developments in replacement of low detached residential dwellings.

A Site Location and Context Map is provided in **Figure 1** below.

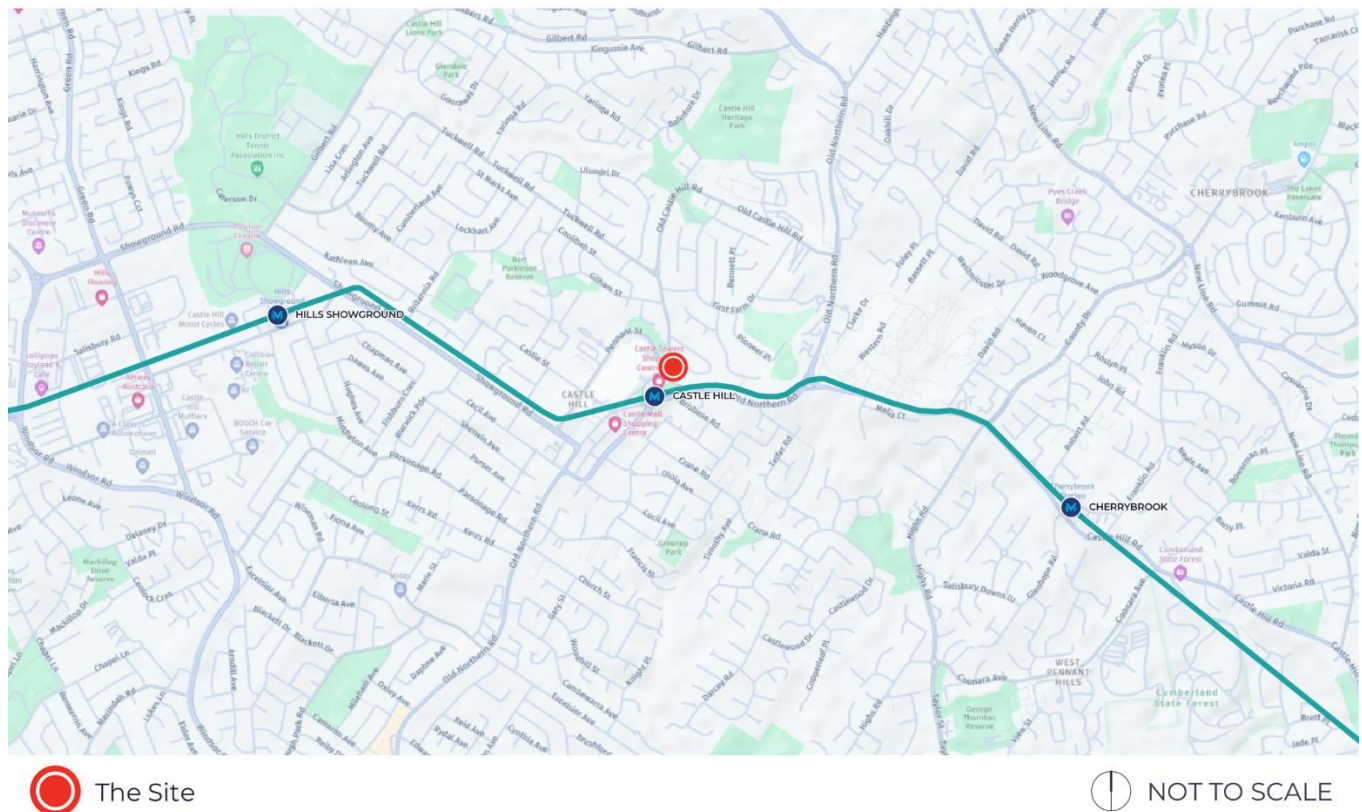


Figure 1 Site Location and Context Map

Source: Nearmap, edits by Colliers Urban Planning

2.2 Key Features of Site and Surrounds

2.2.1 Site Description

The site is located at the corner of Old Castle Hill Road and McMullen Avenue comprising an area of 3,180.4m². It comprises 4 lots in an irregular configuration. It has an approximate frontage of 50m to McMullen Avenue, 54m to Old Castle Hill Road and 41m to Garthowen Crescent. It is also bounded by adjoining lots at 3 Garthowen Crescent to the north-east and 8 McMullen Avenue to the south-east.

The site area and legal description is recorded in **Table 2** below:

Table 2 *Site Description*

Legal Description	Address	Area (m ²)
Lot 10 in DP 881332	16 Old Castle Hill Road	610.66
Lot 11 in DP 881332	18 Old Castle Hill Road	1305.73
Lot 20 in DP 222257	20 Old Castle Hill Road	533.87
Lot 1 in DP 204335		736.39
Total Area		3,180.4

A Site Aerial is provided in **Figure 2** below.

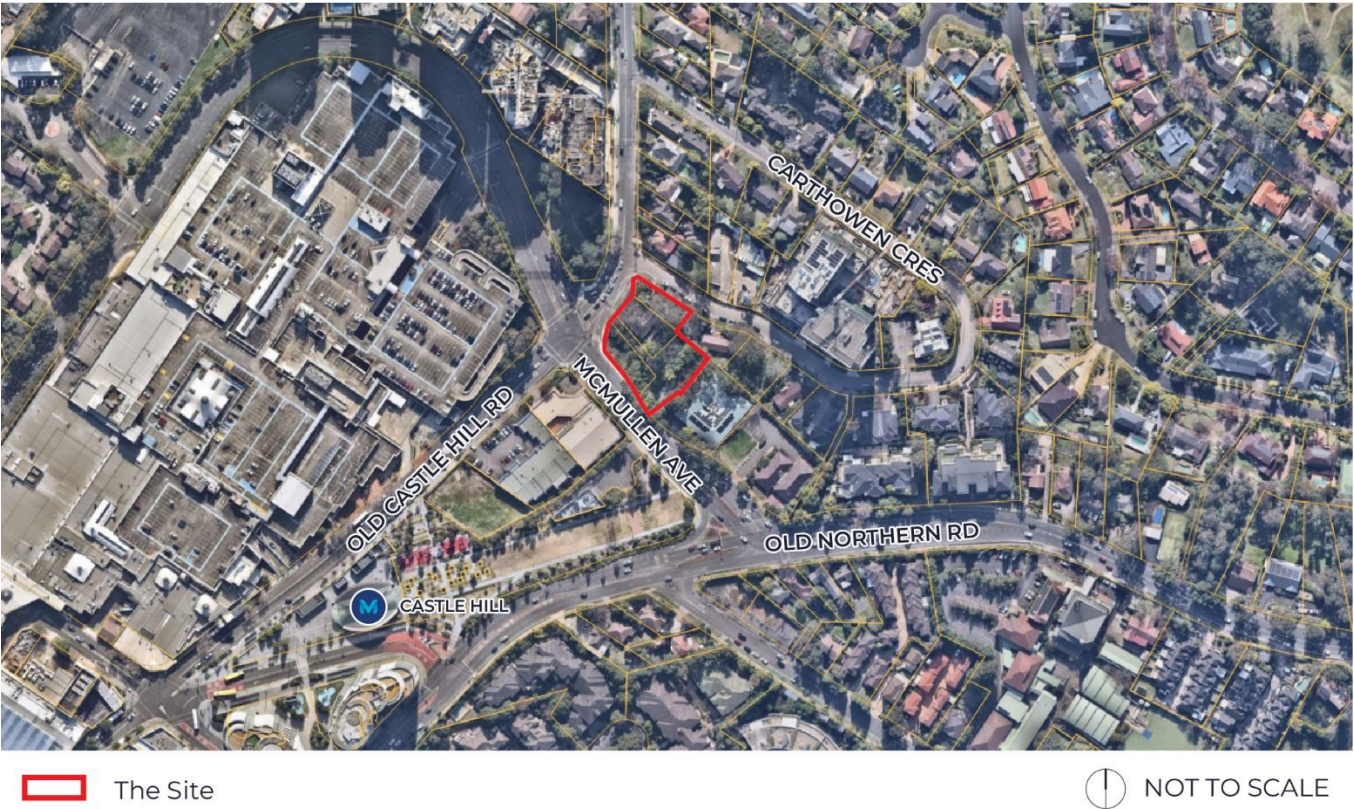


Figure 2 *Site Aerial Map*

Source: Nearmap, edits by Colliers Urban Planning

2.2.2 Existing Development

The site currently contains development comprising two detached residential dwellings located on 18 and 20 Castle Hill Road. Vehicular and pedestrian access for both dwellings is provided to Old Castle Hill Road by a shared driveway. 20 Old Castle Hill Road has additional vehicular access provided to Garthowen Crescent. There is currently no development on 16 Castle Hill Road. The site as a whole is covered in dense vegetation and has a steep slope upwards from the north-west to the south-east.

Figure 3, Figure 4, and Figure 5 illustrate the existing development on the site.



Figure 3 20 Old Castle Hill Road and shared driveway to 18 Old Castle Hill Road

Source: Google Maps



Figure 4 18 Old Castle Hill Road as viewed from McMullen Avenue



Figure 5 16 Old Castle Hill Road and steep slope upwards

Source: Google Maps

2.2.3 Surrounding Development

The site is situated within an area undergoing pronounced change from a low density residential character to a high density transport-oriented community following the opening of Castle Hill Metro Station. The surrounding development is summarised as follows:

- **North:** The site is bounded to the north by Garthowen Crescent. Opposite the site consists of low density detached houses, and a new, high density residential flat building, located at 8-18 Garthowen Crescent. Development to the north is displayed in **Figure 6**.
- **East:** Adjoining the site to the east is a 2 storey commercial building and car park containing tenancies of several businesses. Elsewhere to the east are low density residential dwellings. Development to the east is shown in **Figure 7**.



Figure 6 8-18 Garthowen Crescent, looking north-east



Figure 7 8 McMullen Avenue adjoining the site to the east

Source: Google Maps

- **South:** The site is bounded to the south by McMullen Ave. Castle Hill Metro Station and Athur Whitling Reserve are approximately 250m to the southwest. Further to the south are a mixture of late 20th century residential flat buildings and older low density residential dwellings. Development to the south is displayed in **Figure 8** and **Figure 9**.
- **West:** The site adjoins Old Castle Hill Rd to the west, at the corner of a medium-sized signalled intersection with McMullen Avenue and Pennant Street. Further to the west is the Castle Towers shopping centre, a five-storey retail complex. Elsewhere to the north-west are contemporary high density residential flat buildings. Development to the west is shown in **Figure 10** and **Figure 11**.



Figure 8 Castle Hill Metro Station and Arthur Whitling Reserve



Figure 9 Dwelling mix south of Old Northern Road



Figure 10 Intersection of Old Castle Hill Road, McMullen Avenue and Pennant Street; Castle Towers car-park to the right



Figure 11 New residential flat buildings at 51-55 Old Castle Hill Road and 9 Gay Street, north-west of the site

Source: Google Maps

2.2.4 Surrounding Future Development

A recent emergence of high-density residential and mixed-use built form typologies within the Castle Hill Town Centre has been facilitated by the introduction of the North West Rail Link (NWRL), also known as the Sydney Metro in 2019. Key surrounding future potential developments and developments under construction are listed in **Table 3** below.

Table 3 Surrounding Future Development

Development	Description	Status
325-329 Old Northern Road, Castle Hill SSD-86785964 Approximately 200m to the south of the site.	Shop top housing development including 162 apartments comprising a 6-storey mixed use (commercial and residential) podium and a 19-storey residential tower.	Prepare EIS
93-107 Cecil Avenue and 9-10 Roger Avenue, Castle Hill SSD-78156221 Approximately 750m to the south of the site	Mixed-use development with in-fill affordable housing comprising four buildings ranging from 5 to 25 storeys with 615 residential apartments (including 169 affordable apartments) and ground level retail/commercial uses, and 979 car spaces in two basement levels and three above ground car parking levels.	Response to Submissions
6-14 Castle Street, Castle Hill - Castle Towers Shopping Centre DA 1431/2023/JP Approx 300m from the site to the south-west	Alterations and additions to Castle Towers Shopping Centre including a new office tower and hotel tower	Approved
Kentwell Avenue Precinct, Castle Hill Approx 600m from the site to the west	Planning Proposal PP-2022-3644 by QIC for the amendment of The Hills LEP to enable a mixed-use residential precinct with a central park, comprising approximately 1,400 dwellings.	Gateway Determination
16-30 Dawes Avenue, 4-8 Hughes Avenue and 2-10 Cadman Crescent, Castle Hill: SSD-80229956 Approximately 1.5km from the site to the south-east	Demolition of existing structures and construction of 360 units in four (4) residential flat buildings eight (8) storeys in height. The application will modify DA672/2023/JP to incorporate additional levels and make amendments to the basements to facilitate the re-configuration of the basement layout to provide parking for additional units.	Approved
8-18 Garthowen Crescent, Castle Hill 1611/2020/JP	Construction of a 13 storey and an 18 storey residential flat building comprising together 196 apartment units over four levels of basement car parking containing 236 car parking spaces.	Approved and under construction
51-55 Old Castle Hill Road and 9 Gay Street, Castle Hill 1946/2016/JP	Demolition of existing structures and construction of five residential flat buildings comprising 962 units, a swimming pool and community facility over basement parking.	Approved and under construction (partially completed)
4-22 Showground Road, Castle Hill 693/2025/ZA PP-2022-3644	DA: seeks consent to consolidate 38 existing lots to nine (9) lots and construct new roads and associated civil works. PP: seeks to amend the site's planning controls under The Hills LEP 2019 to facilitate the site's transformation into a vibrant mixed-use precinct organised around an integrated centrally located park, with approximately 1,410 apartments and employment floorspace for over 1,000 jobs.	DA and PP: Under Assessment

2.2.5 Topography

The topography of the site is characterised by a moderately steep upwards slope from west to east. The site has an elevation difference of 7.71m from a low point of 129.56RL in the west to a high point of 137.27RL in the east. This is depicted in the detailed Survey Plan included at **Appendix F**.

2.2.6 Vegetation

As identified in the Aboricultural Report (refer to **Appendix G**), there are 99 trees on or adjoining the site. The vegetation on the site consists of a range of exotic and native species including Box-elder Maple, Chinese Elm, Broad-leaved Paperbark, Blackbutt and Jacaranda, ranging from juvenile to mature.

2.2.7 Public Transport

The site is in a desirable location for proximity to public transport services. The following services are within walking distance of the site.

Metro

Castle Hill Station is a key station on the Sydney Metro network. Services run approximately every 5 minutes towards either Tallawong to the west or Sydenham via Sydney CBD to the east. The site is approximately 330m walking distance from the station entrance.

Bus

The site is approximately 330m walking distance from the Castle Hill Station bus interchange. It services a range of high and low frequency bus routes that service the Sydney CBD and other suburban centres including Parramatta and Pennant Hills. There is also a bus stop immediately out the front of the site on Old Castle Hill Road, which is serviced by the 604, 632, 633 and 662 buses, which provide access to Pennant Hills Station and other local points of interest.

2.2.8 Surrounding Road and Bicycle Network

Surrounding Road Network

The site is directly adjacent to the intersection of Old Castle Hill Road, McMullen Avenue and Pennant Street. Old Castle Hill Road is subject to a proposed road widening which encroaches on the subject site and is discussed further in this report. These roads can be characterised as collector roads carrying a moderate-high flow of traffic with no street-parking available. Further south, McMullen Avenue connects to Old Northern Road, an arterial road that extends from Wisemans Ferry to the north to Windsor Road (Baulkham Hills) to the south.

The site is bordered to the north by Garthowen Crescent, a narrow local street with low traffic flow and one-directional street parking.

Pedestrian Connectivity

Footpaths are provided on McMullen Avenue and Old Castle Hill Road, but not on Garthowen Crescent. A signalised pedestrian crossing of McMullen Avenue provides safe pedestrian access to Castle Hill Station and interchange for public transport services.

It is noted that a northern portion of the site along Garthowen Crescent is identified for footpath widening, as there is no footpath currently located on the southern side of the street.

2.2.9 Heritage Items

The site is not in immediate proximity to any heritage items or heritage conservation areas of local significance outlined in The Hills Local Environmental Plan 2019. The heritage items in the broader Castle Hill town centre are summarised in **Table 4** below.

Table 4 *Surrounding Heritage Items*

Address	Description	Item No. <i>As reflected in Schedule 5</i>	Distance from site
14 Garthowen Crescent, Castle Hill	"Garthowen"	I51	190m south-west
264-266 Old Northern Road, Castle Hill	Castle Hill Public School	I63	570m south-east
	Former police station	I64	570m south-east
340 Old Northern Road, Castle Hill	House	I65	730m east

“Providing ongoing housing supply and a range of housing types in the right locations will create more liveable neighbourhoods and support Greater Sydney’s growing population.”

Greater Sydney Region Plan: A Metropolis of Three Cities – Objective 10

Numerous State and Federal government initiatives have been developed in recent years to assist in alleviating and reducing the pressure of the current housing affordability and supply crisis in NSW, all of which have a common goal of delivering significantly greater housing supply in key locations. The introduction of the NWRL servicing the Castle Hill locality has fundamentally transformed the former suburban character of the area to a prime location for transport-oriented development intensification.

The proposed development is uniquely positioned to champion numerous government initiatives relating to the delivery of additional housing supply and contributing to the growth and development of Castle Hill as a town centre. This EIS seeks consent for the Early Works for the proposed mixed use development to be approved under a forthcoming SSDA. As such, the strategic planning context is considered with respect to the future Main Works SSDA, as the proposed Early Works will facilitate its future development. Further consideration of the Strategic Planning Context will be provided in the EIS for the Main Works SSDA.

2.3.1 Alignment with Strategic Planning Context

The proposal is consistent with the relevant Government plans, policies and guidelines applying to the site as outlined in **Table 5** below. For ease of reading, the Early Works and Main Works developments are collectively referred to in this section as ‘the proposed development’ / ‘the proposal’.

Table 5 *Summary of Strategic Context*

Strategic Plan	Strategic Context
<i>National Housing Accord 2022</i>	In October 2022, the Federal Government announced the National Housing Accord, which committed to delivering 1.2 million houses in well-located areas in the 5 years starting from the year 2024. Each LGA in NSW was given a 5-year housing delivery target; The Hills LGA was given a target of 23,300 dwellings. Given that a large proportion of young people are renting and want to live close to their workplace and highly amenable and serviced areas, this proposal has the potential to deliver what people want and assist in meeting the target of the National Housing Accord. Specifically, NSW has committed to delivering 3,100 affordable homes between 2024-2029, facilitated by a new SSD pathway for residential developments (with an estimated development cost of \$75 million) and which deliver up to 15% of affordable housing, which the proposed development is consistent with and utilises. The proposed development is consistent with NSW’s commitment to provide these affordable homes in well-located areas, in that the site is located near a large number of jobs, public transport connections, social infrastructure such as schools and hospitals, and other amenities, services and open space. Overall, the proposed development is aligned with the National Housing Accord as it seeks to deliver a significant amount of additional housing including affordable housing in a modern and contemporary living style in a strategic location, and contributes to meeting The Hills 5-year housing target.
<i>Greater Sydney Region Plan – A Metropolis of Three Cities</i>	The Greater Sydney Region Plan – A Metropolis of Three Cities (Region Plan) prepared by the then Greater Sydney Commission (GSC) is the overarching strategic plan to manage change and growth in the Greater Sydney Region. It sets a 40-year vision where most residents live within 30-minutes of their jobs, education and health facilities, services and great places. The proposed development of the site is consistent with the Region Plan’s vision to improve Greater Sydney and make it more liveable, productive and sustainable. Specifically, this proposal is aligned with the key priorities outlined in the Region Plan by: • Integrating and targeting the delivery of dwellings and infrastructure to support a growing population and respond to their needs. • Increase housing supply through the provision of more diverse and affordable housing. • Integrating a diverse range of services on site.

Strategic Plan	Strategic Context
	• Liveability and housing the city with housing (including affordable housing) close to jobs, infrastructure and education. The Housing Strategies of the Region Plan include addressing the housing need, diversity, market preference, alignment of infrastructure, amenity, engagement and efficiency. Affordable housing and affordable rental housing are crucial to supply housing diversity for those on moderate incomes and low income households. This is specifically in line with Objective 11 which the proposed development aligns with.
<i>Central City District Plan</i>	The Central City District Plan (District Plan) builds upon the Regional Plan's vision, objectives and strategies to provide a 20-year plan to manage growth in the Central City District. The Proposal supports the objectives of the Central City District in that it: • Provides greater housing supply and choice with access to jobs, services and public transport. • Provides housing where there are links to walking and cycling connections to assist in the promotion of a healthier lifestyle. • Allows for the provision of diverse housing types that meet housing needs.
<i>Housing 2041 – NSW Housing Strategy</i>	<i>Housing 2041</i> is the NSW Government's 20-year vision for the delivery of housing across the State. Released in 2021, <i>Housing 2041</i> sets out the framework for delivering more housing in the right locations, more diverse housing options that suit diverse demographics, as well as high amenity housing. <i>Housing 2041</i> establishes four pillars to underpin the future of housing. The proposed development will closely align with each of these pillars in the following manner: • Supply: The proposal will deliver a total of 371 dwellings with 56 of these being affordable housing. • Diversity: A range of 1, 2 and 3-bedroom apartments are proposed to appeal to a broad residential market and ensure that all types of households have a place in the development. • Affordability: The proposed development aims to provide 56 affordable housing units. • Resilience: ESD principles are embedded into the buildings design and future operation. This is subject to a separate SSDA application for the main works.
<i>NSW Future Transport Strategy 2056</i>	The Future Transport Strategy sets out a 40-year vision, directions and outcomes framework for moving people in NSW and will guide transport investment over the longer term. The Future Transport Strategy was refreshed in 2022 to take into account the COVID-19 Pandemic, drought, bush fires, floods, alongside population growth and global megatrends. It includes a new focus on the six cities region, striving to revitalise and connect communities, encourage thriving local neighbourhoods, and build on economic success. The proposal is consistent with the Strategy by delivering increased residential dwellings and affordable housing within a highly accessible location within Castle Hill with excellent access to transport, jobs and education.
<i>North West Rail Link Corridor Strategy</i>	The NWRL Strategy sets out the strategic land use framework for existing and new centres to benefit from new NWRL stations, setting out a plan for Castle Hill to serve as "the Major Centre for Sydney's North West", through the delivery of a range of residential, commercial, retail and community uses. The Castle Hill Station Structure Plan supplements the Corridor Strategy, providing additional detail for the strategic planning direction in this designated 'High Density Apartment Living' precinct. The proposed development aligns with the objective of this precinct to 'provide for the housing needs of a growing community and to encourage an increased residential density in areas with direct access to the new rail link and station'.
<i>The Hills Local Strategic Planning Statement (2020)</i>	The Hills Local Strategic Planning Statement (LSPS) establishes a 20-year vision for land use to guide future growth within The Hills LGA. It also aims to align within the vision and objectives set under the Greater Sydney Region Plan and The Hills Community Strategic Plan. The LSPS identifies Castle Hill as a strategic centre within the North West Metro urban renewal corridor where new high density residential development will be located. The proposal will support the objectives of the LSPS by facilitating high density residential development in a strategic location within the Castle Hill strategic centre and in close proximity to Castle Hill Metro Station. The siting and massing of the development seeks to capitalise on this opportunity by provided taller buildings in appropriate locations in the Castle Hill Centre.

Strategic Plan	Strategic Context
Castle Hill Precinct Plan (2024)	The Castle Hill Precinct Plan envisions Castle Hill as a vibrant regional destination with an expanding the mix of uses, including increased housing supply and more employment opportunities aligned with the skills of local residents. Its vision for housing includes: • Capacity for nearly 11,130 dwellings by 2041. • Diverse housing choice of varying sizes and typologies. • Transit oriented neighbourhoods with convenient access to the Metro Station, bus services, shops, jobs, cafes, recreation and high density apartments in appropriate locations. • Encouraging the delivery of medium density housing typologies (the 'missing middle') in the centre to provide housing choice to residents. • Retaining the existing detached low density residential housing supply at the periphery of the precinct. The site is identified for high density residential development under the plan. This proposal fulfils the vision for high density transit-oriented housing in Castle Hill.

2.4 Cumulative Impacts

The nearby relevant future proposals that have the potential to result in cumulative impacts are identified in **Table 6** below. This has previously been discussed in **Section 2.2.4** for surrounding future development.

Table 6 Surrounding Future Development

Development	Description	Timing / Status
325-329 Old Northern Road, Castle Hill SSD-86785964	Shop top housing development including 162 apartments comprising a 6-storey mixed use (commercial and residential) podium and a 19-storey residential tower.	This application is currently in the 'Prepare EIS' phase, meaning that no documentation or application has been formally lodged yet.
Approximately 200m to the south of the site.		Given that the planning phase of this project is less progressed than 16-20 Old Castle Hill Road, it is anticipated that the construction of this development will occur following any works on the site. Coordination may be required prior to the commencement of construction for this application (subject to approval) with respect to construction traffic management. This would occur through submission and approval of the final Construction Traffic and Pedestrian Management Plan with the relevant project delivery office within Transport for NSW.
93-107 Cecil Avenue and 9-10 Roger Avenue, Castle Hill SSD-78156221	Mixed-use development with in-fill affordable housing comprising four buildings ranging from 5 to 25 storeys with 615 residential apartments (including 169 affordable apartments) and ground level retail/commercial uses, and 979 car spaces in two basement levels and three above ground car parking levels.	This application is currently in the 'Response to Submissions' phase of the development, meaning that the application is more progressed than 16-20 Old Castle Hill Road. Given that the planning phase of this project is more progressed than 16-20 Old Castle Hill Road, it is anticipated that the construction of this development may occur prior to any works commencing on the site. It should be noted that 93-107 Cecil Avenue is 750m from the site, and accordingly there are unlikely to be any significant cumulative impacts during the construction phase, should these coincide. Nevertheless, coordination may be required prior to the commencement of construction for this application with respect to construction traffic.
Approximately 750m to the south of the site		

Development	Description	Timing / Status
6-14 Castle Street, Castle Hill - Castle Towers Shopping Centre DA 1431/2023/JP Approx 300m from the site to the south-west	Alterations and additions to Castle Towers Shopping Centre including a new office tower and hotel tower	Development consent was granted for this project in August 2024. Given the planning phase of the project is recently complete and construction is anticipated to begin soon, it is anticipated that the construction of this development will overlap with the construction of 16-20 Old Castle Hill Road (subject to approval). Coordination may be required prior to the commencement of construction for this application (subject to approval) with respect to construction traffic management. This would occur through submission and approval of the final Construction Traffic and Pedestrian Management Plan with the relevant project delivery office within Transport for NSW. The cumulative impact of the developments during operation is discussed further at Section 6.0, as well as part of the Main Works SSDA (subject to a separate approval).
Kentwell Avenue Precinct, Castle Hill Approx 600m from the site to the west	Planning Proposal PP-2022-3644 by QIC for the amendment of The Hills LEP to enable a mixed-use residential precinct with a central park, comprising approximately 1,400 dwellings.	The Planning Proposal received Gateway Determination in December 2025. No Development Application for the carrying out of mixed-use development contemplated by the Planning Proposal has been lodged or approved by Council. Given that the planning phase of this project is less progressed than 16-20 Old Castle Hill Road, it is anticipated that the construction of this development will occur following any works on the site. Any future applications as a result of the planning proposal will be subject to further assessment, which will require consideration of cumulative impact.
16-30 Dawes Avenue, 4-8 Hughes Avenue and 2-10 Cadman Crescent, Castle Hill: SSD-80229956 Approximately 1.5km from the site to the south-east	Demolition of existing structures and construction of 360 units in four (4) residential flat buildings eight (8) storeys in height. The application will modify DA672/2023/JP to incorporate additional levels and make amendments to the basements to facilitate the re-configuration of the basement layout to provide parking for additional units.	This application is currently in the 'Response to Submissions' phase of the development, meaning that the application is more progressed than 16-20 Old Castle Hill Road. Given that the planning phase of this project is more progressed than 16-20 Old Castle Hill Road, it is anticipated that the construction of this development may occur prior to any works commencing on the site. Furthermore, 16-30 Dawson Avenue is approximately 1.5km from the site, and therefore, there are unlikely to be any significant cumulative impacts during the construction phase.
8-18 Garthowen Crescent, Castle Hill 1611/2020/JP	Construction of a 13 storey and an 18 storey residential flat building comprising together 196 apartment units over four levels of basement car parking containing 236 car parking spaces.	This application has been approved and is currently under construction, with one of the approved buildings fairly progressed. Given the progression of the construction, it is anticipated that the major phases of construction will occur prior to the commencement of construction for 16-20 Old Castle Hill Road (subject to approval).

Development	Description	Timing / Status
		Coordination may be required prior to the commencement of construction for this application (subject to approval) with respect to construction traffic management. This would occur through submission and approval of the final Construction Traffic and Pedestrian Management Plan with the relevant project delivery office within Transport for NSW. The cumulative impact of the developments during operation is discussed further at Section 6.0, as well as part of the Main Works SSDA (subject to a separate approval).
51-55 Old Castle Hill Road and 9 Gay Street, Castle Hill 1946/2016/JF	Demolition of existing structures and construction of five residential flat buildings comprising 962 units, a swimming pool and community facility over basement parking.	This application has been approved and is currently under construction, with the majority of works progressed. Given the progression of the construction, it is anticipated that the major phases of construction will occur prior to the commencement of construction for 16-20 Old Castle Hill Road (subject to approval). Should any construction still be underway when construction proceeds at 16-20 Old Castle Hill Road, coordination may be required prior to the commencement of construction for this application (subject to approval) with respect to construction traffic management. This would occur through submission and approval of the final Construction Traffic and Pedestrian Management Plan with the relevant project delivery office within Transport for NSW.
4-22 Showground Road, Castle Hill 693/2025/ZA PP-2022-3644	DA: seeks consent to consolidate 38 existing lots to nine (9) lots and construct new roads and associated civil works. PP: seeks to amend the site's planning controls under The Hills LEP 2019 to facilitate the site's transformation into a vibrant mixed-use precinct organised around an integrated centrally located park, with approximately 1,410 apartments and employment floorspace for over 1,000 jobs.	The DA component of this development is currently under assessment, whilst the planning proposal component is awaiting gateway approval. The planning proposal element is much further behind in the planning process, and therefore it is not relevant with consideration of cumulative impact. The DA is for subdivision and minor civil works only, and therefore, it is not anticipated there will be any cumulative impacts resulting from this application. Any future applications as a result of the planning proposal will be subject to further assessment, which will require consideration of cumulative impact.

2.5 Analysis of Alternatives

Alternative options have been considered by the Applicant in response to the strategic need and objectives for the development of the site. This includes not undertaking any works on the site ('do nothing'), proceeding without additional affordable housing, consideration of alternative designs, and proceeding with the redevelopment as proposed. It is noted that this section has been prepared with consideration of the overall development on the site, including the future residential development that is subject to a future application.

2.5.1 Option 1 – Do Nothing

The 'Do Nothing' scenario would result in the site remaining underutilised when compared to the strategic merit of a new mixed use development.

This option does not provide a desirable outcome as it fails to adequately plan to provide for future growth and opportunities to provide housing and affordable housing within Castle Hill. This option is not consistent with the applicable statutory or strategic planning framework, which envisage redevelopment of the site to supply more housing close to new transport infrastructure. With the current housing crisis prevalent across Sydney, to leave the site in its current state would be a lost opportunity to supply housing. Moreover, as the site is not subject to significant constraints such as bushfire, contamination, flooding, and biodiversity impacts, it is well-positioned to provide well-located housing within close proximity of public transport.

Therefore, it is evident that the 'Do Nothing' scenario is wholly inconsistent with the site's key features and strategic context presented in **Section 2.0**, by not providing additional housing in Castle Hill in close proximity to a new transport hub.

2.5.2 Option 2 – Use of the site for an alternative purpose

As the site is currently zoned for General Residential (R1) purposes, the site can be developed for a range of residential accommodation purposes, not incorporating retail or commercial uses beyond shop top housing. Furthermore, redevelopment under the existing controls would deliver a residential flat building development; however, it would not fully realise the site's strategic potential. The current controls do not permit the uplift necessary to support the quantum of housing, in particular the inclusion of affordable housing that is now proposed. Proceeding under the existing controls would therefore represent a missed opportunity to deliver a high-performing, integrated town centre outcome aligned with Government housing priorities.

2.5.3 Option 3A – The proposed development

Following the highest and best use analysis of the site, it was determined that a mixed use development including affordable housing, with supporting ground floor commercial premises, was the most appropriate outcome for the site. The proposed Early Works will facilitate the timely delivery of housing on the site and in turn contribute to housing growth within Castle Hill and The Hills LGA.

2.5.4 Option 3B – The proposed development without an early works application

This scenario would be to provide a mixed use development, without a separate early works application. The purpose of the early works application is to enable preliminary construction works to progress on site whilst the detailed elements of assessment relating to the built form works progress. Further, it will allow construction certificates for early works to be granted in an expedient fashion without being delayed by the relative complexity of the Main Works SSDA. This enables the development to progress faster. Without the early works application, the delivery of critical housing, including affordable housing, is delayed. This does not respond to or address the strategic context and demand for affordable housing in Castle Hill.

3.0 Project Description

3.1 Project Overview

This section of the EIS provides a detailed description of the proposal. The Applicant seeks development consent under 'Division 4.7 – Stage Significant Development' of the EP&A Act for Early Works to facilitate a future mixed use development including affordable housing. The Early Works comprise the following:

- Site establishment;
- Establishment works and construction activities;
- Bulk excavation;
- Infrastructure services coordination and deviation;
- Erosion and sediment control; and
- Removal of trees.

The proposed works are discussed further in the following subsections and detailed on the Demolition and Excavation Drawings prepared by StudioSC and included at **Appendix B**.

3.2 Demolition and Site Preparation

The proposal seeks consent for the demolition of all existing structures located on the site. The demolition and other site preparation activities will include:

- Disconnection and capping/make safe of all utilities servicing the site.
- Removal of any redundant services within the site boundary.
- Protection of trees to be retained and establishment of tree protection zones.
- Clearing of low-level vegetation throughout the site.
- Undertake HAZMAT investigations and monitoring.
- Removal and disposal of all hazardous materials identified.
- Undertake soft strip and demolition work to the existing properties including slabs and footings.

Demolition and Excavation plans have been prepared by StudioSC and are provided at **Appendix B** and **Figure 12** below.



Figure 12 Demolition plan

Source: StudioSC

3.3 Excavation for Future Basement

Bulk excavation is proposed to be carried out on the site. The proposed future lower basement level under SSD-85238209 has a finished floor level of RL 112m AHD and will require excavations of up to 24m with deeper localised excavations required for the lift pits and service trenches. The proposed basement is generally set back approximately 5 metres from the site boundary, although in some locations it extends up to the boundary line, as shown in **Figure 13**.

Excavation support is to be provided by full-depth anchored soldier pile walls with shotcrete infill, with piles socketed into Unit 5 or Unit 6 rock to provide adequate capacity and stiffness. The foundation material is further discussed in the Geotechnical Investigation Report at **Appendix H**.

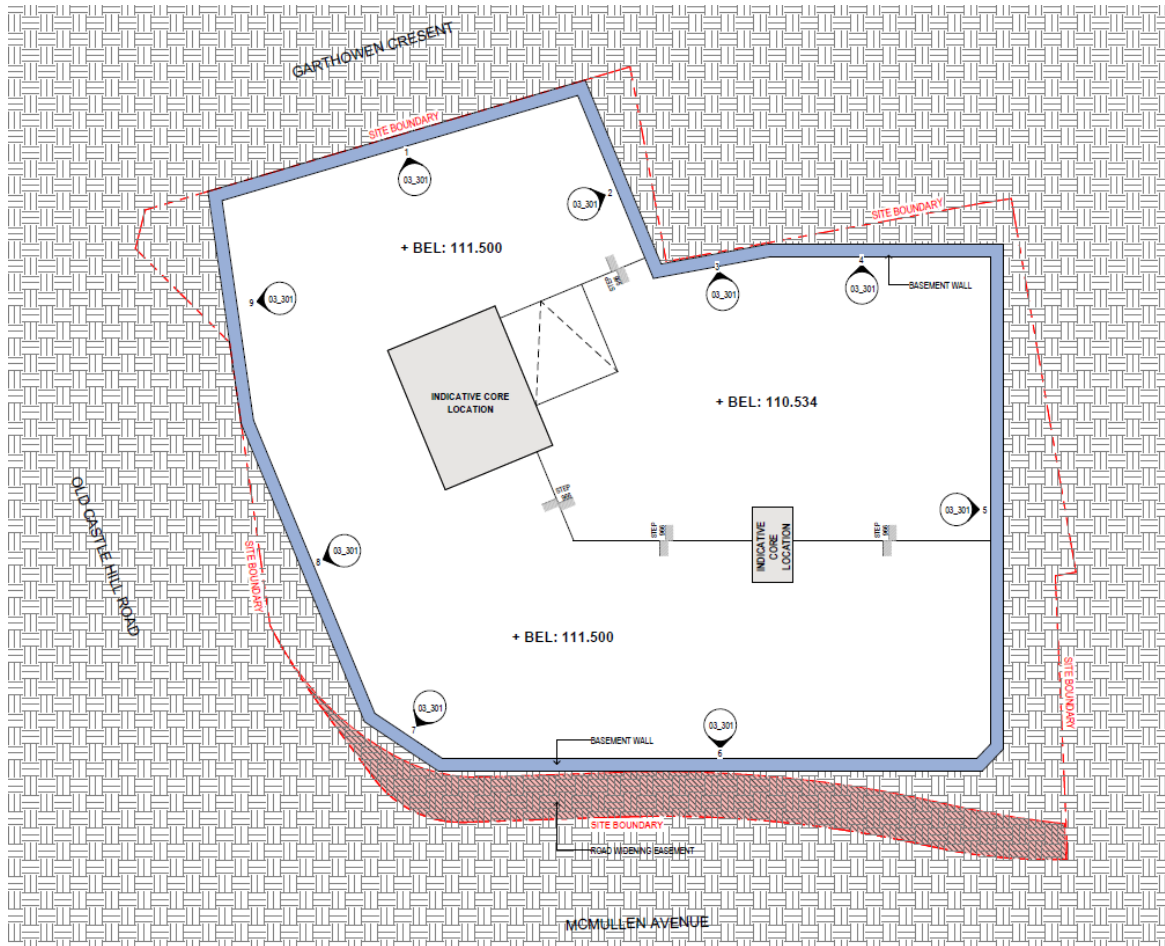


Figure 13 *Excavation extent plan*

Source: Studio SC

3.4 Remediation

Remediation works are proposed to be carried out to allow the site to be redeveloped (proposed separately under a subsequent SSDA). The remediation works proposed for the site are outlined as follows:

- Targeted soil sampling following demolition to define the full extent of impacted fill.
- Remediation will include the excavation and offsite disposal of contaminated soil from across the site, to varying depths depending on the previously identified contaminants throughout the fill materials.

The final extent of impacted soils will be refined through delineation assessments post demolition of existing structures. Further details are included in the Remediation Action Plan (RAP) at **Appendix K**.

3.5 Tree Removal and Protection

Seventy-five (75) trees are proposed to be removed to accommodate the development footprint, including several species exempt under Council controls, as indicated on the tree removal plan at **Figure 14**. Twenty-four (24) trees are proposed to be retained and protected. Protection measures during the construction are proposed for the existing trees which are being retained and the establishment of tree protection zones. Removed trees will be replaced by new plantings as part of the comprehensive landscape plan under the subsequent detailed SSDA for the site.

Further information of the proposed trees being removed is provided at the Arboricultural Assessment Report at **Appendix G**, and further assessed in **Section 6.4**.

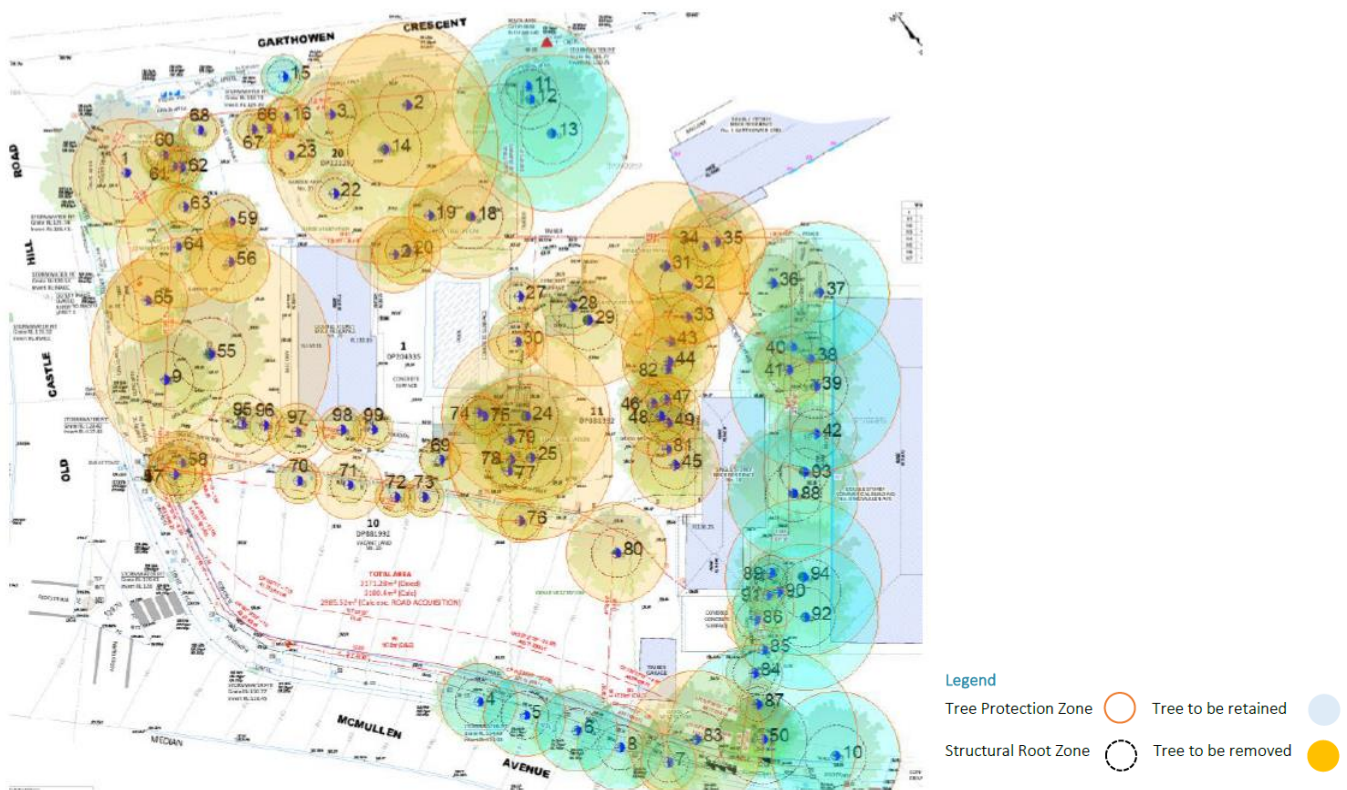


Figure 14 Tree removal and retention

Source: Arbor Express

3.6 Construction Management

A Construction Environmental Management Plan (CEMP) has been prepared by Foundation Earth Sciences and is included at **Appendix L**. It provides details of the construction management measures that will be implemented to address potential impacts on the public domain arising from construction.

The CEMP establishes environmental protection procedures for construction activities in accordance with relevant legislation. It addresses the following matters:

- Asbestos management;
- Demolition;
- Traffic management;
- Surface water and soil management;
- Groundwater and excavation pump out;
- Site signage and site access;
- Construction waste management; and
- Control of dust and odour.

3.6.1 Work Hours

The general construction hours, including for excavation activities, are to be between the hours of 7:00am and 5:00pm Monday to Friday, and between 7:00am and 1:00pm on Saturdays. No access will be permitted on Sundays and Public Holidays.

If work is required other than ordinary working weekdays or outside regular working hours, the contractor or any subcontractor shall give due notice of the intention to do so and obtain prior approval of the site owner.

4.0 Statutory Context

Development approval is sought for the project under the State Significant Development provision of Part 4 of the EP&A Act. The sections below outline the project's key statutory requirements. This section is complemented by a Statutory Compliance Table included at **Appendix C** that identifies all statutory requirements and where those requirements have been addressed in the EIS.

4.1 Power to Grant Approval

The legislative pathway under which the consent is sought, why the pathway applies, and the relevant consent authority is outlined in **Table 7** below.

Table 7 **Power to Grant Consent**

Matter	Consideration
Declaration of State Significant Development	Development consent is sought under 'Division 4.7 - Stage Significant Development' of the EP&A Act 1979. Section 4.36(3) of the EP&A Act states that: <i>The Minister may, by a Ministerial planning order, declare specified development on specified land to be State significant development, but only if the Minister has obtained and made publicly available advice from the Independent Planning Commission about the State or regional planning significance of the development.</i> The State Significant Development Declaration Order 2025 (No 7) dated 13 May 2025 declared the site as State Significant Development under the EP&A Act. Part 2 <i>Declaration of State Significant Development</i> states the following: <i>4 Specified development on specified land declared State significant development</i> <i>(1) The following development is declared to be State significant development –</i> <i>(d) development specified in EOI application 240857 dated 23 February 2025 including development for the purpose of residential flat building with provision of affordable housing at 16-20 Old Castle Hill Road, Castle Hill being Lot 10/DP881332, Lot 11/DP881332, Lot 20/DP222257 and Lot 1/DP204335,</i> As the proposed early works are an inherent part of the declared development, they are included as SSD.
Consent Authority	Section 4.5 of the EP&A Act stipulates that for an application made by a private company, the consent authority is the Minister for Planning and Public Spaces (or DPHI as their delegate).

4.2 Permissibility

The permissibility of the proposed development considering the proposed land use/s and land zoning is outlined in **Table 8** below.

Table 8 Permissibility

Matter	Consideration
Land Use	The proposed early works are associated with the future use as a mixed-use development comprising a residential flat building and retail premises defined under the Standard Instrument.
Land Zoning	The site is zoned part R1 – General Residential and part SP2 – Infrastructure (Local Road Widening) under The Hills LEP 2019.
Permissibility	The only works proposed under this SSDA are demolition and excavation to support the future use of the site. Therefore, demolition and excavation are permissible with consent at the site under clauses 2.7 and 7.2 of The Hills LEP 2019 respectively.

4.3 Other Approvals

The other legislative approvals required for the Proposal in addition to a development consent under Division 4.7 of the EP&A Act are outlined in **Table 9** below.

Table 9 Other Approvals

Matter	Consideration														
Approvals not required for SSD	Section 4.41 of the EP&A Act stipulates that certain authorisations are not required for State significant development. The following legislative approvals would otherwise be required if the Project was not State significant. <table> <tr> <th>Legislation</th><th>Approval Otherwise Required</th></tr> <tr> <td>Legislation that does not apply to State Significant Development</td><td></td></tr> <tr> <td><i>Fisheries Management Act 1994</i></td><td>No</td></tr> <tr> <td><i>Heritage Act 1977</i></td><td>No</td></tr> <tr> <td><i>National Parks and Wildlife Act 1974</i></td><td>No</td></tr> <tr> <td><i>Rural Fires Act 1997</i></td><td>No</td></tr> <tr> <td><i>Water Management Act 2000</i></td><td>Yes</td></tr> </table>	Legislation	Approval Otherwise Required	Legislation that does not apply to State Significant Development		<i>Fisheries Management Act 1994</i>	No	<i>Heritage Act 1977</i>	No	<i>National Parks and Wildlife Act 1974</i>	No	<i>Rural Fires Act 1997</i>	No	<i>Water Management Act 2000</i>	Yes
Legislation	Approval Otherwise Required														
Legislation that does not apply to State Significant Development															
<i>Fisheries Management Act 1994</i>	No														
<i>Heritage Act 1977</i>	No														
<i>National Parks and Wildlife Act 1974</i>	No														
<i>Rural Fires Act 1997</i>	No														
<i>Water Management Act 2000</i>	Yes														
Water Management Act 2000	As stated in the Geotechnical Investigation Report prepared by Douglas Partners (Appendix H), groundwater was measured in the soils and bedrock in the wells between RL 106.7m and RL 125.3m AHD, which is a maximum of about 13.3m above the lowest basement level. Pursuant to section 4.41 of the EP&A Act, SSD is exempt from requirements for a water use approval (section 89), a water management work approval (section 90) and an activity approval (other than an aquifer interference approval) (section 91) of the <i>Water Management Act 2000</i>. If required, a Section 73 Compliance Certificate and approval would be sought as required in accordance with any conditions of consent associated with the early works along with any other approvals required from relevant authorities.														
Consistent Approvals	Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State significant development. The following table lists legislative approvals that are required for the Project and cannot be refused if the Project is approved. <table> <tr> <th>Act</th><th>Approval Required</th></tr> <tr> <td>Legislation that must be applied consistently</td><td></td></tr> <tr> <td><i>Fisheries Management Act 1994</i></td><td>No</td></tr> </table>	Act	Approval Required	Legislation that must be applied consistently		<i>Fisheries Management Act 1994</i>	No								
Act	Approval Required														
Legislation that must be applied consistently															
<i>Fisheries Management Act 1994</i>	No														

Matter	Consideration
	<i>Mine Subsidence Compensation Act 1961</i> No
	<i>Mining Act 1992</i> No
	<i>Petroleum (Onshore) Act 1991</i> No
	<i>Protection of the Environment Operations Act 1997</i> No
	<i>Roads Act 1993</i> Yes
	<i>Pipelines Act 1967</i> No
EPBC Approval	The <i>Environmental Protection and Biodiversity Act 1999 Act</i> (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. These are known as matters of National Environmental Significance. If the proposed development will, or is likely, to impact a matter of National Environmental Significance, then it is required to be referred to the Federal Department of the Environment for assessment to determine if it constitutes a 'controlled action' requiring EPBC approval. Presently, a bilateral agreement allows the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when assessing a controlled action under the EPBC Act. The proposed development is in a highly urbanised area without significant vegetation and therefore is not likely to impact a matter of National Environmental Significance. Therefore, the proposed development is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies. A BDAR Waiver has been granted and is provided at Appendix M.

4.4 Pre-Conditions to Exercising the Power to Grant Consent

The pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent are identified and considered in **Table 10** below

Table 10 Pre-Conditions to Exercising the Power to Grant Consent

Matter	Consideration
<i>Biodiversity Conservation Act 2016</i>	In accordance with this Act, an assessment of any State Significant proposal's biodiversity impacts must be undertaken as part of the provision of any SSDA, including the provision of a Biodiversity Development Assessment Report (BDAR) in instances where it is required. Section 7.14 requires the consent authority to take into consideration the likely impact of the proposed development on biodiversity values as assessed in the BDAR. A BDAR Waiver has been granted and is provided at Appendix M.
<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>	The <i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i> (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure of the State. Section 2.121 requires the consent authority to provide Transport for NSW (TfNSW) with written notice of the development application for developments considered a 'traffic generating activity'. Pursuant to Schedule 3 of the Transport and Infrastructure SEPP, the proposed development is considered to be traffic-generating development as its access is within 90m of a classified road, and the development contains 300 or more dwellings.
<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i>	<i>State Environmental Planning Policy (Resilience and Hazards) 2021</i> (R&H SEPP) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Section 4.6 stipulates that a consent authority must not consent to the carrying out of development unless: - It has considered whether the land is contaminated, and if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out. - If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose.

Matter	Consideration
	The Preliminary Site Investigation, Detailed Site Investigation and Remediation Action Plan prepared by Foundation Earth Sciences confirms that the site can be made suitable for the proposed development and residential uses. Refer to Appendix I-K and Section 6.1.

4.5 Mandatory Matters for Consideration

The matters that the consent authority is required to consider in deciding whether to grant consent to any development application are identified and considered in **Table 11** below.

Table 11 *Mandatory Matter for Consideration*

Legislation	Matters for Consideration
<i>Environmental Planning & Assessment Act 1979</i>	The proposed development is consistent with the objects of the EP&A Act for the following reasons: - The Early Works proposed in this EIS are supporting a future SSDA for the redevelopment of the site. This will therefore promote the delivery of 371 build-to-sell dwellings as well as 56 affordable housing apartments to accommodate the growing population of The Hills LGA and Greater Sydney more broadly. It will positively contribute to housing supply and affordability. - The proposed development will not result in any adverse impacts to threatened species or ecological communities and this has been demonstrated through the obtainment of a BDAR Waiver (Appendix M). - It allows for additional employment opportunities throughout the construction phases. - The proposed works will facilitate the future construction of a well-designed shop top housing development that has high levels of residential and environmental amenity; - It promotes the protection of the health and safety of occupants of the site through remediation, making the site suitable for high density residential development. - It promotes the sharing of responsibility for environmental planning through consultation between State and Local levels of government. - It will facilitate ecologically sustainable development. - It promotes the orderly and economic use of land by facilitating the redevelopment of an underutilised site that is currently below its development potential and provides housing in a highly accessible location. - Provides opportunities for community participation through a consolidated community engagement strategy across the Early and Main Works SSDAs. It is consistent with Division 4.7 of the EP&A Act because: - The development has been declared to have state significance. - The development is not prohibited by an environmental planning instrument. - The development has been evaluated and assessed against the relevant heads of consideration under section 4.15(1), as outlined in this table.
<i>Protection of the Environment Operations Act 1997</i>	The <i>Protection of the Environment and Operations Act 1997</i> (POEO Act 1977) sets out the requirements for certain operations to obtain an Environment Protection Licence (EPL) from the Environment Protection Authority. Schedule 1 of the POEP Act sets out the activities and operations that require an EPL. ‘Contaminated Soil Treatment Works’ are listed under Schedule 1 of the POEO Act 1977, noting that Schedule 1 specifically excludes excavation for treatment at another site. In this instance, the soil will be removed and treated off site, and therefore this does not apply to the works. The RAP at Appendix K confirms that the excavation and removal of material at the site will be undertaken in accordance with the requirements under the POEO Act including:

Legislation		Matters for Consideration
		• The correct classification of waste in accordance with POEO Act 1977 guidelines. • Disposal of waste and other materials to licenced offsite facilities.
Environmental Planning & Assessment Regulation 2021		Part 8, Divisions 2 and 5 of the EP&A Regulation sets out procedures which relate to the preparation and submission of EIS. This EIS has been prepared in accordance with Sections 190 and 192 of Division 5 which relate to the form and content of the EIS. Similarly, the EIS has addressed the principles of ecologically sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious and irreversible environmental damage (refer Section 7.0). Furthermore, this Early Works SSDA would not otherwise be designated development as it does not meet the thresholds specified in Schedule 3 Clause 20.
State Environmental Planning Policy (Biodiversity and Conservation) 2021		Chapter 2 of <i>State Environmental Planning Policy (Biodiversity and Conservation) 2021</i> (BC SEPP) details provisions regarding the preservation and management of vegetation in non-rural areas. Since the site is zoned R1 – General Residential and is located within The Hills LGA, the provisions of this chapter apply to the proposed development. The proposed development involves the removal of 75 trees at the site as outlined in the Arboricultural Assessment Report at Appendix G. Further assessment of the impact of tree removal at the site is provided in Section 6.4.
The Hills Local Environmental Plan 2019	<i>Clause 2.3 Zone Objectives and Land Use Table</i>	The proposed development is consistent with the objectives of the zone. The proposed demolition, remediation and excavation are permissible with development consent in the R1 General Residential zone.
	<i>Clause 2.7 Demolition requires development consent</i>	This application seeks development consent for demolition.
	<i>Clause 4.1A Minimum lot sizes for dual occupancies, dwelling houses, manor houses, multi dwelling housing and residential flat buildings</i>	The minimum lot size for a residential flat building in the R1 General Residential zone is 4,000m². The total site area is 3,180.4m². Clause 4.1A (3) grants the ability for development consent to be granted to development for the purposes of residential flat building in select zones where the area of the lot is less than the minimum lot size area if the consent authority is satisfied that: • <i>the form of the proposed buildings is compatible with adjoining buildings in terms of their elevation to the street and building height, and</i> • <i>the design and location of rooms, windows and balconies of the proposed buildings, and the open space to be provided, ensures acceptable acoustic and visual privacy, and</i> • <i>all dwellings are designed to minimise energy needs and utilise passive solar design principles, and</i> • <i>significant existing vegetation will be retained and landscaping is incorporated within setbacks and open space areas.</i> Refer to the Statutory Compliance Table at Appendix C for detailed assessment.
	<i>Clause 4.3 Height</i>	Not applicable. The proposed development consists of demolition and remediation only.
	<i>Clause 4.4 Floor Space Ratio</i>	Not applicable. The proposed development consists of demolition and remediation only.
	<i>Clause 5.1A Development of land intended to be acquired for public purposes</i>	A portion of the site is zoned SP2 Infrastructure – Local Road Widening. The relevant acquisition authority for this land is The Hills Shire Council. No works are proposed in the applicable area.

Legislation	Matters for Consideration
<i>Clause 5.10 Heritage conservation</i>	The site is not identified as a heritage item under any EPI or impacted by any heritage items.
<i>Clause 5.11 Bush fire hazard reduction</i>	The site is not identified as bush-fire prone land.
<i>Clause 5.21 Flood planning</i>	The proposed development application is supported by a Flood Impact and Risk Assessment prepared by BG&E (Appendix T) which demonstrates the proposal's appropriate adoption of stormwater and flood mitigation measures. The site is not identified as flood-affected land as per The Hills LEP 2019.
<i>Clause 6.3 Public Utility Infrastructure</i>	Urban Property Group are the developer and builder on this project. As part of their investigations, the Proponent has reviewed the utility and servicing requirements of the development, and will continue to engage with the relevant services and infrastructure authorities as the project progresses.
<i>Clause 7.1 Acid sulfate soils</i>	A Preliminary Acid Sulfate Soils Assessment has prepared for the site to manage potential environmental impacts of contaminated soils, and is included at Appendix N and summarised in Section 6.3.3 .
<i>Clause 7.2 Earthworks</i>	The relevant matters that are required to be considered under Clause 7.2 of The Hills LEP have been considered in Section 6.0 .
<i>Clause 7.11 Development on certain land within the Sydney Metro Northwest Urban Renewal Corridor</i>	Not applicable. The proposed development consists of demolition and remediation only.
<i>Clause 7.16 Development on certain land at Castle Hill</i>	The site is identified as "Area 1" on the Clause Application Map. Development consent must not be granted to development on land to which this clause applies unless the consent authority has obtained the concurrence of Transport for NSW (TfNSW). Consultation with TfNSW has been undertaken and the outcomes are outlined in Section 5.0 .

5.0 Stakeholder Engagement

This section describes consultation undertaken and feedback received prior to the lodgement of the EIS for the proposal and engagement to be carried out following lodgement of the EIS. It is supported by an Engagement Report has been prepared by Sarah George Consulting and is included at **Appendix D**.

As part of the consultation undertaken, the community and stakeholders were informed of the scope across both the Main Works SSDA, and this Early Works SSDA for simplicity. Attention in this section is given only to the matters raised relevant to the Early Works SSDA.

5.1 Engagement Carried Out

5.1.1 Identified Stakeholders

A comprehensive list of community members and stakeholders to consult throughout during the preparation of the EIS process was developed through:

- The identification of neighbours who would be impacted by the proposal unless mitigation measures were implemented,
- The identification of stakeholders who would have a particular interest in the proposal.
- The identification of stakeholders who would have information of value to the proposal, for example, Aboriginal groups with cultural knowledge relating to the site.
- Consultation with the DPHI. This included the community members and stakeholders listed in the proposals SEARs that the applicant was required to consult with.

As a result of the above process, a number of stakeholders were identified for consultation, including:

- DPHI, including the Housing Delivery Assessments team;
- The Hills Shire Council;
- Transport for NSW;
- NSW Fire & Rescue;
- NSW Police;
- NSW Department of Communities & Justice (Housing);
- Deerubbin Local Aboriginal Land Council;
- Community and surrounding residents and landowners, including:
 - All dwellings/ buildings on Garthowen Crescent
 - Dwellings and business premises fronting Old Castle Hill Road from north of Garthowen to Opposite Castle Towers
 - Buildings on McMillan Avenue; and
- Surrounding businesses and groups, including Castle Towers Management.

5.1.2 Consultation Methods

As detailed in the Engagement Report (**Appendix D**) of the EIS, a range of consultation methods were used to engage stakeholders. This included activities completed prior to lodgement, through the preparation of the EIS and associated technical studies. The consultation methods are detailed in **Table 12** below.

Table 12 Consultation Methods

Tool/Technique	Description
Letterbox drops to neighbouring premises	The key information of the project was provided in a notice, which invited the community to contact the engagement consultant for further information on the project. The notice was distributed to dwellings and businesses within proximity to the site. In total, 369 notices were distributed.

Tool/Technique	Description
Public notices	A public notice was published in the Daily Telegraph on the 14 August 2025 to notify the broader community of the proposal.
Letters and emails to local community groups and government bodies	Letters and emails were issued to community groups and government departments. Responses were received from Council, Transport for NSW and Castle Towers Management.
Community information webinar	On 26 November 2025, a community information webinar was held to communicate more detailed information about the proposal. 10 registrations were received for the webinar, and eight participants joined the session.
Meeting with Council	On 29 November 2025, a meeting was held with Hills Shire Council where the Applicant presented the scheme.
SDRP	Two meetings with the SDRP were held prior to the declaration of this project as SSDA via the HDA. This is more relevant to the main works application, and is discussed in greater detail as part of that separate application.

Source: Sarah George Consulting

This approach follows the *Undertaking Engagement Guidelines for State Significant Projects* (2021) by:

- Engaging with relevant NSW Government agencies, service providers, Council, close neighbours and targeted members of the community who are most likely impacted or interested in the proposal;
- Informing the surrounding community to the site about the proposal and providing opportunities to engage directly with the project team;
- Explaining how community feedback will be considered and documented;
- Providing relevant information in plain English so that potential impacts and implications can be readily understood; and
- Providing channels of communication to gather feedback.

5.2 Stakeholder Views

The key issues and matters raised by the community and stakeholders (insofar as they relate to the early works scope) during the preparation of the Scoping Report, SEARs and EIS are outlined in **Table 13** below.

Table 13 Stakeholder Views

Theme/Issue	Detail	Project response
Traffic	• Construction related traffic • Cumulative traffic impacts with new, under construction, and proposed developments in proximity	• Traffic Impact Assessment (TIA) accompanies the application. • The TIA includes detail of the estimated traffic generation of the proposal and assesses the impacts on the surrounding road network. This is informed by traffic surveys and SIDRA (traffic modelling software) assessments that quantify existing and post-development conditions. • Cumulative impacts are also considered in the TIA.
Parking	• Demand for on-street parking during construction • Experiences with construction workers parking over driveway.	• Onsite car parking is provided in accordance with the SEPP Planning Provisions, TfNSW Guidelines and Council's controls.
Construction related impacts	• Noise and vibration • Congestion on Garthowen Crescent	• A Construction and Demolition Waste Management Plan will be provided to manage construction waste, processes and disposal.

Theme/Issue	Detail	Project response
	- Cumulative impacts with multiple developments in close proximity - Scepticism around the application of management plans based on recent experience.	- Construction-related traffic impacts are considered in the Traffic Impact Assessment accompanying the application. - A Construction Traffic Management Plan will be prepared. - The Acoustic Assessment includes recommendations to minimise construction noise impacts.
Cumulative impacts	Concerns regarding multiple construction projects occurring at the same time.	Cumulative construction related impacts can be managed through coordination between sites.

Source: Sarah George Consulting

5.3 Engagement to be Carried Out

The project team are committed to ongoing community consultation following the submission of the EIS. This includes during the exhibition and assessment of the project and following a determination.

Following its submission, the DPHI will exhibit the EIS on the Major Projects NSW Website and invite submissions from government agencies and the public. Once the exhibition period is complete, the DPHI may require the applicant to prepare a Submissions Report in response to issues raised. The project team will continue to liaise with the DPHI and stakeholders during the proposal's assessment to address queries that may arise.

6.0 Assessment of Impacts

This section of the report assesses and responds to the environmental impacts of the proposed SSD. It addresses the matters for consideration set out in the SEARs dated 2 July 2025 (see **Appendix A**). The Mitigation Measures proposed to mitigate any environmental impacts are provided at **Appendix E** and complement the findings of this section.

6.1 Contamination and Remediation

A Preliminary Site Investigation (PSI) (**Appendix I**), Detailed Site Investigation (DSI) (**Appendix J**) and Remediation Action Plan (RAP) (**Appendix K**) have been prepared by Foundation Earth Sciences Pty Ltd. The reports assess contamination risks, confirm the site's suitability for high-density residential development, and outline the remediation and validation required to achieve a suitable standard.

The PSI provides a preliminary assessment of potential contamination based on site history, visual inspection and regulatory searches. The DSI includes intrusive soil and groundwater sampling to quantify contamination against adopted criteria. The RAP sets out remediation objectives, acceptance criteria and a staged programme of works to address identified impacts and data gaps.

6.1.1 Assessment

A number of boreholes were drilled on the site to ascertain the potential contamination impact of the development. Borehole BH11 contained lead-impacted fill to 0.2m below ground level, with concentrations exceeding the adopted human health criteria. No asbestos was detected in the analysed soil samples, and fibro cement fragments were confined to building structures rather than soils. Minor heavy metal concentrations elsewhere across the site were within, or close to, typical urban background levels.

In groundwater, arsenic was detected above generic freshwater criteria for total concentrations; however, speciated arsenic was below the adopted site-specific criteria and the overall groundwater risk was assessed as low. A preliminary screening assessment identified low potential for per- and poly-fluoroalkyl substances (PFAS) and no PFAS sampling was required.

On this basis, contamination presents a low to moderate risk for the proposed residential use, provided the recommended remediation is implemented. The lateral and vertical extent of impacted fill at Borehole BH11 remains to be fully delineated, and soils beneath existing building footprints will require assessment once demolition has occurred.

6.1.2 Mitigation and management

In response to the above findings, a RAP has been prepared to mitigate any risks associated with contamination. The RAP sets out a staged remediation program to address identified impacts and remaining data gaps. This program includes:

- Site establishment, health and safety inductions and implementation of environmental controls.
- A detailed site walkover and planning of additional sampling locations.
- Targeted soil sampling following demolition to define the full extent of impacted fill.
- Excavation and off-site disposal of contaminated soil to a suitably licensed landfill, with waste classification in accordance with the NSW EPA Waste Classification Guidelines.
- Validation sampling of site surfaces and landscaped areas against NEPM criteria, including confirmation of the absence of asbestos in surface soils and acceptable aesthetic conditions.
- Preparation of a validation report confirming completion of remediation in accordance with the RAP.

In addition to the staged works, the RAP specifies a range of management and monitoring controls to minimise risks during implementation. These include:

- An unexpected finds protocol.
- Dust suppression and erosion and sediment controls during intrusive works (see **Appendix W**).
- Robust QA/QC procedures for sampling and laboratory analysis.

- Community and worker health and safety measures for removal of hazardous building materials, including asbestos, in accordance with relevant legislation and codes of practice.

In addition to the above mitigation measures, a Construction and Environmental Management Plan has been prepared by Foundation Earth Sciences (**Appendix L**), which outlines management methodologies that will be implemented to address the environmental risks through the construction process. All relevant recommendations have been incorporated into the Mitigation Measures at **Appendix E**.

6.1.3 Conclusion

The investigations confirm that the site can be made suitable for the proposed high-density residential development, subject to full implementation of the RAP. The remediation works recommended by this RAP will be undertaken as part of the Early Works package proposed in this EIS.

Remediation will comprise targeted excavation and validation of impacted soils, assessment and management of fill beneath existing structures, and appropriate removal of hazardous building materials. No active groundwater remediation is required.

It is appropriate for conditions of consent to require:

- Completion of post-demolition sampling and delineation of impacted fill.
- Implementation of remediation and validation works under the supervision of a suitably qualified and experienced environmental consultant.
- Classification and lawful off-site disposal of all excavated soils and wastes.
- Certification of site suitability for the intended use prior to commencement of main construction works.

Where relevant, the recommendations of the RAP have been incorporated into the Mitigation Measures at **Appendix E**.

6.2 Hazardous Materials

A Preliminary Hazardous Materials Assessment has been prepared by Foundation Earth Sciences and is included at **Appendix O**. Based on a site inspection and laboratory analysis, the assessment identifies bonded asbestos-containing materials in fibrous cement sheeting and electrical backboards, synthetic mineral fibres in insulation and ceiling panels, and lead-containing paint on internal walls and external window frames, with no significant lead dust and PCBs or CFCs not expected. The report recommends controlled removal and disposal of all identified hazardous materials by appropriately licensed contractors in accordance with WHS Regulations 2011 and relevant Australian Standards, guided by a Hazardous Materials Register and followed by clearance certification. These recommendations have been incorporated into the Mitigation Measures at **Appendix E**.

Subject to implementation of these measures and confirmation of clearance prior to construction, the site is considered suitable for demolition and subsequent redevelopment.

6.3 Ground and Groundwater conditions

6.3.1 Geotechnical

A Geotechnical Investigation has been undertaken by Douglas Partners and is provided at **Appendix H**. The investigation comprised drilling four boreholes to depths of between 24.25m and 34m, installing three groundwater monitoring wells, undertaking in situ testing and laboratory analysis, and interpreting subsurface conditions.

Existing conditions

Subsurface conditions comprise a veneer of sandy clay and clay fill to depths of about 0.4-1.5m, underlain by stiff to hard residual clays with ironstone gravels to depths of approximately 2.0-3.5m. Below the residual soils there is extremely weathered siltstone to around 4.7m depth. Bedrock consists of Ashfield Shale (siltstone) extending to about 16-21m with variable strength, underlain by Mittagong Formation with interbedded siltstone and sandstone of medium to high strength to around 22-26m, and high strength Hawkesbury Sandstone below this depth.

Groundwater monitoring recorded levels between RL 107.6m AHD and RL 125.55m AHD, indicating that groundwater seepage will be encountered during bulk excavation for the basement levels.

Methodology and criteria

The investigation was carried out in accordance with AS 1726:2017 and involved a combination of drilling, in situ testing and laboratory analysis. Boreholes were advanced using auger and HQ diamond coring techniques, with Standard Penetration Tests (SPT), packer tests and rising head permeability tests undertaken to characterise soil and rock behaviour. Laboratory testing assessed soil aggressivity, salinity, sodicity, erodibility and shrink-swell potential, while rock strength was classified using Point Load Strength Index testing.

Assessment

The investigation confirms that excavation will intersect medium to high strength bedrock, meaning that bulk excavation will be relatively slow and will require the use of rock hammers and rock saws, particularly in the deeper horizons. Groundwater seepage is expected at basement levels and is likely to increase following periods of rainfall, necessitating temporary and permanent drainage measures (refer to **Section 6.3.2**).

Soil aggressivity is assessed as non-aggressive to mildly aggressive to concrete and steel, and site soils are non-saline with negligible acid sulphate soil risk. Residual soils are moderately dispersive and therefore susceptible to erosion under adverse conditions if left exposed.

Mitigation and management

The report recommends a suite of geotechnical mitigation and management measures to support safe excavation and long-term performance of the proposed structure. Prior to excavation, dilapidation surveys of adjacent structures are recommended to document existing conditions. Excavation close to boundaries should use rock saws to minimise vibration and overbreak, supported by vibration monitoring with a peak particle velocity limit of 8 mm/s for human comfort and to reduce the risk of cosmetic damage.

Excavation support is to be provided by full-depth anchored soldier pile walls with shotcrete infill, with piles socketed into Unit 5 or Unit 6 rock to provide adequate capacity and stiffness. Progressive geotechnical inspections are recommended at approximately 1.5m excavation intervals to confirm ground conditions and adjust the support design if required.

To limit erosion, exposed soils should be promptly covered by building structures, pavements or vegetation once excavation and construction are complete.

For foundation design, pad footings or bored piles founded on Unit 5 or Unit 6 rock are recommended, with allowable bearing pressures of up to 8 MPa for Hawkesbury Sandstone where confirmed by testing. Ongoing monitoring, including survey and inclinometer measurements of ground movement and vibration trials at the commencement of excavation, will be used to verify performance against design assumptions and to trigger any required adjustments to methodology.

These measures have been incorporated into the Mitigation Measures at **Appendix E**.

Conclusion

The geotechnical conditions are considered suitable for the proposed development, provided the recommended excavation support, groundwater management, vibration control and foundation design measures are implemented. No

specific acid sulphate soil or salinity management plans are required. With the proposed mitigation strategies in place, geotechnical impacts are expected to be manageable and acceptable in the context of the SSDA.

6.3.2 Groundwater

A Groundwater Impact Assessment has been prepared by Douglas Partners at **Appendix P**. It considers potential groundwater inflows, drawdown and water quality impacts associated with construction and operation of a drained basement. It also outlines management measures and licensing requirements under the *Water Management Act 2000* and the NSW Aquifer Interference Policy (AIP).

Existing conditions

Monitoring since 1 September 2025 recorded groundwater levels between RL 106.7m and RL 125.3m AHD. The proposed basement finished floor level of RL 112m AHD will intersect the groundwater table. Groundwater is fresh and slightly acidic, with exceedances of guideline values for a range of metals, ammonia and faecal coliforms at selected locations.

No groundwater dependent ecosystems are mapped within 500m of the site and the five registered nearby bores are predominantly monitoring bores. Acid sulphate soils are not mapped and site testing indicates non-saline conditions despite a regional moderate salinity potential.

Assessment

Because of the depth of the basement and interplay with the existing water table, dewatering will be required during the construction of the basement, and long term, the basement will be required to be constructed as a drained basement. Model results indicate that groundwater inflows to the drained basement are modest and manageable through standard dewatering systems. Under base case conditions, inflows are predicted at about 6 m³/day (around 2.3 ML/year), increasing to around 33m³/day (about 11.9 ML/year) in the sensitivity case.

Maximum drawdown is approximately 2m at 50m from the excavation, largely confined to the bedrock aquifer. This presents negligible risk of subsidence or structural damage and predicted drawdown at nearby registered bores remains within AIP Level 1 criteria.

Groundwater quality exceedances for metals, ammonia and microbiological indicators mean that extracted water will require treatment prior to discharge. No specific management is required for salinity or acid sulphate soils. A Salinity Assessment has been prepared, provided at **Appendix V**.

Mitigation and management

A combination of design, operational and monitoring measures will be implemented to manage groundwater during construction and, where relevant, operation (subject to a future SSDA). Design controls include perimeter drainage, targeted grouting to reduce inflows and a sump-and-pump dewatering system discharging to the stormwater network, subject to approval.

Trigger levels will be set for inflow rates, with exceedances prompting review of conditions and, if necessary, additional grouting or drainage modifications. Extracted groundwater will be treated using conventional methods such as sediment control, pH adjustment, metals removal and hydrocarbon separation to meet adopted discharge criteria.

A monitoring programme will provide baseline data, confirm treatment performance and demonstrate ongoing compliance. This will include staged monitoring (baseline, optimisation and routine phases), regular sampling during continuous discharge and analysis by a NATA-accredited laboratory. Reporting will document inflow volumes, monitoring results and any corrective actions, with a final dewatering report confirming completion and compliance.

Conclusion

The assessment concludes that a drained basement can be constructed and operated without significant impacts on surrounding groundwater systems or nearby structures, provided the recommended management measures are implemented. Predicted inflows under base case conditions are below 3 ML/year, likely avoiding the need for a Water Access Licence, and sensitivity case inflows remain within NSW AIP Level 1 minimal impact criteria.

Groundwater disposal will require treatment and monitoring to ensure compliance with discharge standards. The relevant measures to manage the groundwater and dewatering has been incorporated into the Mitigation Measures at **Appendix E**.

6.3.3 Acid sulfate soils

A Preliminary Acid Sulfate Soil (ASS) Assessment has been prepared by Foundation Earth Sciences is provided at **Appendix N**. The site is located on low rolling hills at elevations of 132-140m AHD underlain by Wianamatta Group shale with residual silty clays, well above the typical elevation band (below about 5m AHD) where ASS occur. Four boreholes encountered fill and natural silty clays to about 1.5 m depth with no jarosite, shells or unusual discolouration, indicating a low likelihood of sulphidic material.

On this basis, the report concludes the site is not impacted by Actual or Potential Acid Sulphate Soils to the depths investigated and that no Acid Sulphate Soil Management Plan or further ASS investigations are required. The proposed development can proceed without ASS-specific mitigation, subject to standard construction environmental controls for soil and water quality.

6.4 Arboricultural impact

An Arboricultural Impact Assessment has been prepared by Arbor Express and is provided at **Appendix G**. The assessment identifies trees on and adjacent to the site, evaluates their condition and retention value, and recommends protection measures.

A total of 99 trees were recorded, including Box-elder Maple, Chinese Elm, Broad-leaved Paperbark, Blackbutt and Jacaranda, ranging from juvenile to mature. Retention values were assigned based on environmental, cultural and structural factors, with trees classified from High to Very Low.

Of the 99 trees, 75 are proposed to be removed to accommodate the development footprint, including several species exempt under Council controls, as shown in **Figure 15**. The remaining 24 trees, mostly along boundaries or on adjoining land, are recommended for retention. Encroachment modelling using AS 4970-2025 indicates only minor encroachments (10 per cent or less of TPZ) for selected trees and moderate encroachments (more than 10 per cent and up to 20 per cent of TPZ) for a small group of retained trees. No major encroachments into TPZs or SRZs are predicted, and the moderate encroachments are considered acceptable given existing hard surfaces and the high vitality of affected trees.

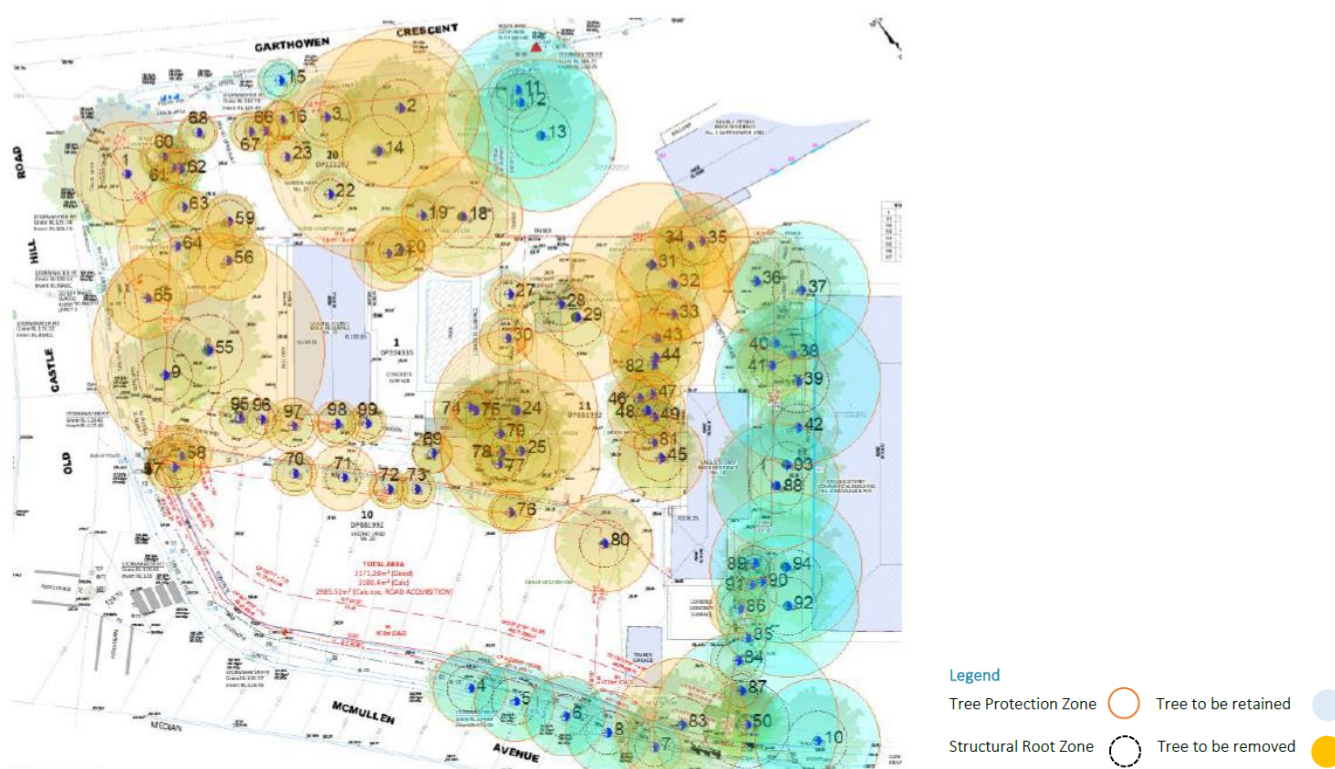


Figure 15 Tree removal and retention

Source: Arbor Express

Protection and management will be achieved through implementation of the Tree Protection Plan, including fencing around TPZs where practicable, trunk protection where fencing cannot be installed, use of non-destructive excavation within TPZs and arborist-supervised hold points before works, during excavation and root pruning, and at completion. All measures are to comply with AS 4970-2025 and the detailed guidelines in the appendices.

The assessment concludes that, while substantial tree removal is required, the retained trees can be adequately protected and that residual impacts are minimal and manageable with the recommended controls and ongoing arborist oversight.

6.5 Assessment of other Impacts

An assessment of the other impacts of the development have been undertaken by the relevant specialist consultants and other issues have been assessed as required in **Table 14**.

Table 14 Other Matters

SEARs	Issue	Assessment
3	Contributions and Public Benefit	This application is for Early Works only and as such no dwellings are proposed, and no contribution is required under the Castle Hill North Contributions Plan.
9	Transport	A Transport Impact Assessment and Preliminary Construction Traffic Management Plan has been prepared by Stantec Australia Pty Ltd (Appendix Q) to assess demolition and excavation traffic impacts for the proposed development in line with the <i>Guide to Transport Impact Assessment</i> and the <i>Traffic Control at Work Sites Technical Manual</i>. During demolition and excavation, all heavy vehicles (mainly MRVs and HRVs, with occasional articulated vehicles) will use Garthowen Crescent for access, which may cause short, localised interruptions to traffic flows and minor delays to pedestrians when trucks manoeuvre, although no disruption to bus or metro services is anticipated and emergency access will be maintained at all times. Truck movements will be restricted to designated routes and confined to the State and Regional roads where possible. Truck routes to and from the site have been identified with the aim of minimising the impact of construction traffic on local roads. The state roads in which trucks will be directed to use include Old Northern Road, Pennant Street, Showground Road, Windsor Road and Castle Hill Road. This will minimise construction vehicle impact on surrounding local street networks. Parking impacts are expected to be minimal, limited to any temporary Works Zone that may be approved. Traffic control and safety will be managed through Traffic Guidance Schemes prepared in accordance with TfNSW manuals and AS1742.3:2019, accredited traffic controllers, restricted construction hours, designated truck routes confined to State and regional roads, and on-site loading and unloading. A spotter will manage pedestrian movements at the site access, with pedestrians given priority at all times. A more detailed Construction Traffic Management Plan will be prepared prior to the construction certificate to confirm heavy vehicle volumes, swept paths, cumulative impacts, parking management and emergency procedures. With these measures in place, demolition and excavation traffic impacts are expected to be short term, manageable and acceptable.
10	Noise and Vibration	A Noise and Vibration Impact Assessment has been prepared by RWDI Australia at Appendix R in accordance with the NSW EPA Interim Construction Noise Guideline (2009) and TfNSW Construction Noise and Vibration Strategy (2018). Baseline monitoring between 12 and 22 May 2025 recorded daytime Rating Background Levels of around 57 dBA and ambient levels of 58-64 dBA, with road traffic from Old Castle Hill Road and McMullen Avenue the dominant noise source and nearby dwellings, commercial premises and Eric Fenton Reserve identified as sensitive receivers. Construction noise criteria were set using ICNG Noise Affected and Highly Noise Affected Levels, and vibration limits were derived from CNVS and BS 7385 for building damage and human comfort. Modelling indicates that demolition and excavation will exceed Noise Management Levels and, in some cases, the Highly Noise Affected threshold, with predicted levels up to about 84 dBA at the most exposed receivers. Vibration from equipment such as hydraulic hammers, vibratory rollers and piling plant may approach or exceed recommended minimum working distances, creating a risk of cosmetic damage and discomfort if not carefully managed, although additional construction traffic noise is not expected to be perceptible. A Construction Noise and Vibration Management Plan (CNVMP) is required to define work hours, plant use, monitoring, complaints handling and community notification, and to embed mitigation such as plant selection and maintenance, turning equipment off when idle, use of acoustic screens and enclosures, maximising separation distances, and orienting plant away from receivers. Where necessary, vibration trials and unattended vibration monitoring will be used to refine controls. Subject to implementation of the CNVMP and all reasonable and feasible mitigation measures, noise and vibration impacts during demolition and excavation are considered manageable and acceptable in the context of ICNG and CNVS requirements. Where relevant, Mitigation Measures relating to construction noise and vibration have been incorporated at Appendix E.

SEARs	Issue	Assessment
16	Biodiversity	The proposed development is in a highly urbanised area without significant vegetation and therefore is not likely to impact a matter of National Environmental Significance. Therefore, the proposed development is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies. A BDAR Waiver has been granted and is provided at Appendix M .
17	Waste Management	A Construction and Demolition Waste Management Plan has been prepared by Elephants Foot Consulting (Appendix S) addressing demolition and excavation waste in line with The Hills Shire Council Guidelines, NSW waste strategies and the NSW EPA Waste Classification Guidelines, with a target to divert at least 80% of waste from landfill. The site currently contains one dwelling, with early works involving demolition, removal of vegetation and excavation for six basement levels, generating building debris, green waste and large volumes of spoil. Waste volumes and diversion rates were estimated using benchmark generation rates and classified under the EPA guidelines, with demolition waste predicted to achieve around 89% diversion (principally through recovery of concrete, bricks, timber and metals) and excavation spoil volumes achieving an indicative 96% recovery via on-site reuse or transfer to licensed facilities, subject to contamination testing. Hazardous materials such as asbestos, if encountered, will trigger immediate cessation of works in the affected area and engagement of licensed contractors, with contaminated materials to be contained, tested by a NATA-accredited laboratory and transported in covered vehicles to appropriate EPA-approved facilities. Reuse and recycling measures include on-site reuse of spoil and sandstone where practical, mulching of green waste, crushing concrete and bricks for aggregate, and dedicated skips for segregated waste streams, supported by site inductions, daily inspections and audit trails. The plan demonstrates that demolition and excavation waste impacts can be effectively managed, with approval appropriately conditioned on implementation of the Waste Management Plan and a detailed Construction Management Plan prior to works.
18	Social Impact	During demolition and excavation, the main social impacts are predicted to be temporary increases in noise and vibration, dust and air quality issues, construction traffic and congestion on narrow local roads, and a short-term loss of amenity and tranquillity for nearby residents, including older and culturally diverse households. These impacts are assessed as short term but potentially significant without controls, although they are confined to the construction phase. Mitigation will be achieved through a Construction Noise and Vibration Management Plan, a Construction Traffic Management Plan, dust suppression measures, restricted working hours and coordination with other nearby projects. Ongoing communication with residents, including advance notice of high-impact activities and a complaints contact, is recommended to maintain transparency and trust. With these measures in place and compliance with consent conditions, demolition and excavation impacts are considered manageable and no long-term adverse social effects are anticipated. A Social Impact Assessment fulsomely considers the impacts of construction and the completed development under SSD-85238209.
19	Flood Risk	The Flood Impact and Risk Assessment prepared by BG&E at Appendix T concludes the site is not flood-prone, with Hills Shire Council confirming no flood-affected status under the DCP. Given the site's elevated position (more than 50 metres above nearby floodplains) and small upstream catchment, significant overland flow is unlikely. Stormwater will be conveyed by the existing pit-and-pipe network and managed through a separate drainage report. As a result, no detailed FIRA is required, and the proposal meets the SEARs for flood risk and impact.
20	Bushfire	The development is not located on mapped bush fire prone land and a bush/grass fire threat is not identified on or adjoining the site. As such, a Bush Fire Assessment detailing bush fire protection measures and compliance with Planning for Bush Fire Protection is not required for this SSDA.
21	Aboriginal Cultural Heritage	An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Regal Heritage at Appendix U that concludes there are no Aboriginal objects, declared Aboriginal Places or PADs within the site and that archaeological potential is nil due to extensive historical disturbance. Consultation with seven RAPs was undertaken in accordance with NSW guidance. As a result, no further archaeological investigation is required and the proposal may proceed subject to

SEARs	Issue	Assessment
		implementation of standard unexpected finds and human remains protocols and continued RAP engagement during ground-disturbing works.

7.0 Project Justification

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The proposed development involves demolition, remediation and excavation, as outlined in **Section 3.0**. The assessment must, therefore, focus on the identification and appraisal of the effects of the proposed change over the site's existing condition.

In considering the justification of the proposed development and in reference to Section 4.15 of the EP&A Act which specifies matters for consideration a consent authority must consider in determining a development application, the following matters have considered:

- Design of the proposed development, including actions taken to avoid or minimise the impact of the proposed development while still achieving the objectives of the project;
- Consistency with the strategic context;
- Consistency with the statutory requirements;
- The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality;
- The suitability of the site for the development; and
- The public interest.

7.1 Consistency with the Strategic Context

The proposed early works facilitate future development that is consistent with the relevant strategic planning framework and associated guidelines. As described in **Section 2.0**, the early works align with the objectives of key strategic framework by facilitating a future mixed-use development in a well-served location.

This Early Works SSDA will:

- Support broader regional and district planning goals by enabling the future development of housing in an accessible, well-connected precinct.
- Facilitate a future development aligned with key strategic priorities relating to design excellence, environmental sustainability, integrated transport and connectivity, and the delivery of local jobs and services.
- Directly address the current housing affordability and supply crisis by facilitating future delivery of a significant quantum of dwellings, including affordable rental dwellings, in a location well served by public transport.
- Facilitate the future development of an activated ground plane to enhance the vibrancy of the locality and provide convenience to residents and visitors through the provision of retail uses on the ground floor.

7.2 Consistency with the Statutory Requirements

The relevant statutory requirements have been discussed in **Section 4.0** and assessed in **Appendix C**.

Specifically, this EIS has addressed all of the matters specified in the issued SEARs dated 2 July 2025 (refer to **Appendix A**) and Section 190 and 192 of the EP&A Regulation (refer to **Appendix C**).

7.2.1 Consistency with the Objects of the Act

The Proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact. Specifically, the Proposal is consistent with the Objects of the Act for the following reasons:

- The Early Works proposed in this EIS are supporting a future SSDA for the redevelopment of the site. This will therefore promote the delivery of 371 build-to-sell dwellings as well as 56 affordable housing apartments to

accommodate the growing population of The Hills LGA and Greater Sydney more broadly. It will positively contribute to housing supply and affordability.

- The proposed development will not result in any adverse impacts to threatened species or ecological communities and this has been demonstrated through the obtainment of a BDAR Waiver (**Appendix M**).
- It allows for additional employment opportunities throughout the construction phases.
- The proposed works will facilitate the future construction of a well-designed shop top housing development that has high levels of residential and environmental amenity;
- It promotes the protection of the health and safety of occupants of the site through remediation, making the site suitable for high density residential development.
- It promotes the sharing of responsibility for environmental planning through consultation between State and Local levels of government.
- It will facilitate ecologically sustainable development.
- It promotes the orderly and economic use of land by facilitating the redevelopment of an underutilised site that is currently below its development potential and provides housing in a highly accessible location.

7.2.2 Principles of Ecologically Sustainable Development

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

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation, pricing and incentive mechanisms.

An analysis of these principles is provided in the following sections.

7.2.2.1 Precautionary Principle

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

This EIS and its supporting reports and studies has not identified any serious threat of irreversible damage to the environment and therefore, the precautionary principle is not relevant to the proposal.

7.2.2.2 Intergenerational Equity

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

- Facilitating opportunities for employment near homes and public transportation during construction.
- Implementing safeguards and management measures to protect environmental values, including efforts for erosion and sediment control, reduced waste to landfill and reduced portable water consumption.
- Reducing energy, water, and waste to ensure that the health, diversity, and productivity of the environment are maintained for the benefit of future generations.
- Facilitating the opportunity for future housing supply for a diverse range of residents, renters and affordable housing tenants, thereby assisting current future generations access to a diverse range of high amenity housing.
- Facilitating the opportunity for future homes in close proximity to jobs and public transport, allowing varied residents to access their places of work conveniently and with the potential to reduce car dependency.
- Including a consolidated list of mitigation measures (**Appendix E**) to safeguard and protect the environment.

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

7.2.2.3 Conservation of biological diversity and ecological integrity

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

7.2.2.4 Improved valuation, pricing and incentive mechanisms

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

7.3 Likely Impacts of Development

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

Additionally, the proposed mitigation measures detailed within **Section 6.0** and **Appendix E** outlined mitigation and management measures that will minimise the impact of the proposed development.

7.3.1.1 Natural Environment

The environmental impact assessment (**Section 6.0**) demonstrates that:

- The Proposal will not have any significant effect on threatened species, populations or ecological communities or their habitat arising from the construction or uses of the proposed development. The Proposal will not have an impact on any matters of national environmental significance under the *Environmental Protection and Biodiversity Conservation Act 1999* (Cth), or *Biodiversity Conservation Act 2016* (NSW); and
- The biodiversity waiver at **Appendix M** confirms that the proposed development is not expected to have any impacts on species of biodiversity significance or critical habitat.
- The Proposal will not result in any undue adverse environmental impacts. Potential sources of risk associated with the construction works of the early works can be managed with the appropriate safeguards and mitigation measures as outlined in this EIS.

7.3.1.2 Social and Economic

The proposed development will provide social and economic value for Castle Hill and the broader community. The following positive social and economic impacts are of note:

- The proposed development forms part of the enabling works for the Ministerial declared HDA site under SSD-85238209 which will assist in meeting the urgent demand for housing in New South Wales. The efficient delivery of the proposed HDA development at this site will deliver approximately 371 dwellings located in close proximity to transport connections and essential services, responding to the high demand for housing in the area.
- The site is currently underutilised, remediation and demolition undertaken at the site will allow for more economically productive use of the site and will provide additional jobs in the local area during the works phase.

7.4 Suitability of the Site

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

- The proposed demolition can be undertaken with development consent, with no unreasonable impacts to surrounding development and land uses.

- The proposed buildings and structures to be demolished are not of heritage significance or within a heritage conservation area.
- The buildings and structures proposed to be demolished are not currently being utilised, demolition will make way for more economic use of the land.
- The proposal is consistent with the provisions of The Hills LEP 2019.
- The proposed development forms part of the enabling works for future development being separately assessed under an SSDA pathway that will deliver a high density residential outcome with increased housing close to transport and essential services.

7.5 Public Interest

Having regard to the public interest, the proposed development is in the public interest for the following reasons:

- The proposed early works will facilitate a development that will directly respond to the strategic vision and objectives for the delivery of additional housing supply envisioned by the National Housing Accord 2022, Housing 2041, as well as the Greater Sydney Region Plan and Central City District Plan. This includes the delivery of well-located homes in a highly accessible location.
- The proposed development will create direct employment during the early works phase of the development.
- The proposed development complies with the relevant statutory development standards and controls.
- The proposed development will not give rise to any adverse built environmental impacts, mitigation measures provided (**Appendix E**) suitably mitigate against any potential environmental impacts as a result of early works at the site.

8.0 Conclusion

The Environmental Impact Statement (**EIS**) has been prepared to consider the natural environment, built environment and social and economic impacts of the proposed early works.

This EIS has addressed the issues outlined in the SEARs (**Appendix A**) and accords with section 190 and 192 of the EP&A Regulation. Having regard to environmental and economic and social considerations, including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The State Significant Development Declaration Order 2025 (No 7) dated 13 May 2025 declared the project as State Significant Development under the *Environmental Planning and Assessment Act 1979*. The proposed development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including The Hills LEP 2019 and relevant State Environmental Planning Policies.
- The proposed SSDA forms part of the enabling works for the Ministerial declared HDA site under SSD-85238209 (SEARS issued 10 June 2025), which will result in the construction of new high-density dwellings close to transport and essential services. The proposed demolition, remediation and excavation works will ensure the expedient delivery of the HDA application at the site (SSD-86460458) which must be lodged within 9 months, as per the requirements of the HDA approval pathway.
- The early works will facilitate the redevelopment of the site for high density residential purposes, which will deliver important social and economic benefits to the community by contributing to housing diversity in a highly accessible location in proximity to existing services and public open space.
- The early works will facilitate a development that directly responds to the strategic vision and objectives for the delivery of additional housing supply, stated in such documents as the National Housing Accord 2022, Housing 2041, the Greater Sydney Region Plan and Central City District Plan, and Council's Local Strategic Planning Statement and Local Housing Strategy.
- The assessment of the proposed early works has demonstrated that they will not result in any unreasonable environmental impacts that cannot be appropriately managed consistent with the relevant planning controls for the site.
- Supporting technical studies which accompany this SSDA demonstrate that the environmental impacts associated with the early works are acceptable and will not give rise to any adverse impacts.
- The proposed development is suitable for the site and in the public interest.

Given the merits described above, and the significant benefits associated with the proposed development, it is requested that the State Significant Development Application (SSDA) be approved.



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