

25 August 2025

Mr Anthony Witherdin  
Director  
Key Sites & TOD Assessments  
4 Parramatta Square, 12 Darcy Street  
Parramatta, NSW 2124

Attention: Mr Anthony Witherdin  
By submission: via the NSW Major Projects Planning Portal

Dear Mr Witherdin

**RE: Formal Objection to Proposed Residential Development SSD-80229956 at 16–30 Dawes Avenue, 2–10 Cadman Crescent and 4–8 Hughes Avenue, Castle Hill NSW 2154.**

We write as the Strata Managing Agents of SP 106632 (“Chateau” – 16 Middleton Avenue, Castle Hill) on behalf of the Chateau Strata Committee to submit this formal objection to the proposed apartment development. This objection is based on substantial non-compliances with the Housing SEPP, Apartment Design Guide (ADG) and The Hills Development Control Plan (DCP), and on significant adverse impacts on surrounding Showground streets, the local community, and neighbouring properties including 16 Middleton and 5 Fishburn Crescent.

**1. Failure to Comply with Planning Controls and Maximum Building Height**

The LEP height limit of 21 m, even with the Housing SEPP’s 27.2% uplift (26.71 m), is exceeded by the proposed 29.1 m height. This requires a Clause 4.6 variation that is unjustified, as the exceedance is to accommodate rooftop elements rather than an unavoidable constraint. This breach undermines the LEP’s intent, sets an unacceptable precedent and will cause visual bulk and overshadowing impacts, including to Chateau and 5 Fishburn Crescent.

**2. Solar Access, Privacy and Amenity Deficiencies**

The proposal fails the Housing SEPP non-discretionary standard requiring 70% of dwellings to receive 3 hours of sunlight in mid-winter, achieving only 68% meeting even the ADG’s lesser 2-hour benchmark, with 14% receiving none. ADG visual privacy separations are also breached in upper levels, enabling intrusive overlooking into neighbouring properties. Communal open space sunlight compliance is unproven. These failings diminish the livability of both the proposed apartments and surrounding dwellings, including the ground-floor open space of Chateau.

### **3. Traffic, Parking and Infrastructure Impacts**

The surrounding local streets—Dawes Avenue, Hughes Avenue, Cadman Crescent, Middleton Avenue and Fishburn Crescent—are already narrow, with unrestricted kerbside parking limiting manoeuvrability. The additional apartments will generate at least 12–15 more peak hour trips, ignoring cumulative impacts from other precinct developments. The proposed oversupply of 631 parking spaces (well above the Housing SEPP minimum of 440) will induce higher car use, undermining the Showground Precinct’s active transport goals and worsening congestion. Construction-phase works zones on multiple frontages will remove parking, disrupt pedestrian access, and bring large construction vehicles into already constrained streets.

### **4. Impact on Chateau (16 Middleton and 5 Fishburn)**

The development’s scale, overshadowing and traffic generation will directly impact Chateau at 16 Middleton Avenue and 5 Fishburn Crescent. Residents will experience increased traffic noise, reduced privacy, and diminished outlook. The overshadowing will reduce sunlight to private open spaces, affecting livability and potentially lowering property values.

### **5. Community and Property Value Impacts**

The cumulative effect of overdevelopment without corresponding infrastructure upgrades risks eroding the appeal and property values in the Showground Precinct. The Hills has been sought after for its amenity and planning integrity; this proposal threatens both. Such outcomes may give rise to compensation claims against planning authorities.

### **Conclusion: Immediate Rejection Required**

Given the breaches of statutory controls, the negative impacts on the Showground streets, community amenity and neighbouring properties, and the traffic and infrastructure concerns, we urge you to reject this application. If not refused outright, it must be significantly redesigned to comply fully with the Housing SEPP, ADG and DCP, reduce building height and parking supply, and mitigate amenity, privacy and traffic impacts.

We formally request timely updates regarding this application’s status and further opportunities for community input.

Failure to give due weight to these concerns will leave us with no alternative but to explore all legal remedies available to protect the interests of our residents.

Should you wish to discuss any of the Strata Committee's concerns further, please contact the undersigned on either (02) 9137 2320 or [peter@thestratacollective.com.au](mailto:peter@thestratacollective.com.au).

Kind Regards,  
**The Strata Collective Pty Limited**



Peter Domazetovski  
**Senior Strata Manager**