

Appendix E. Pre-lodgement Consultation

Council Advice	Proponent Response
Strategic Context and Merit	
<p><i>Council's Local Strategic Planning Statement (LSPS) identifies the site as suitable for mixed use development, but notes that holistic precinct planning will ultimately determine the appropriate amount of residential development in the precinct having regard to infrastructure investigations and the outcomes of traffic modelling.</i></p> <p><i>Precinct planning allows the opportunity for greater regard for cumulative yield on all land within the Precinct, the associated infrastructure limitations, and the apportionment of any required funds for infrastructure upgrades. The key outcomes for the Castle Hill Strategic Centre that will underpin Council's Precinct Planning is the need for increased commercial opportunities, particularly in response to the Central City District Plan targets of additional 6,000 - 10,000 jobs by 2036.</i></p> <p><i>Both the North West Rail Link Corridor Strategy and The Hills Corridor Strategy anticipate a commercial only outcome on the subject site, forming part of the Commercial Core of Castle Hill. The Hills Corridor Strategy anticipates a commercial FSR of 3.25:1 on the land (with no residential FSR envisaged). It is noted that your preliminary plans indicate a proposed FSR of 4.5:1, which comprises predominantly residential development.</i></p> <p><i>The Hills Shire Council is the only Metropolitan Council that has met its 2016-2021 housing target and is currently on track to meet its 2026 housing target. The Hills Shire has enough land currently zoned or planned for to meet and exceed its housing targets for 2036 and beyond. The Castle Hill Strategic Centre plays a critical role in ensuring that</i></p>	<p>The Planning Proposal Report and accompanying technical documents have undertaken the necessary strategic planning and analysis to determine an appropriate density and mix of uses for the Site. In particular, the Planning Proposal includes or is accompanied by:</p> <ul style="list-style-type: none"> • A Local Infrastructure Analysis (Section 8.8) to determine the need and appropriate amount of residential development that can be serviced by local infrastructure. • As detailed within the Planning Proposal Report, the Proposal strongly aligns with the aims, objectives and visions under the suite of documents that form the strategic planning framework pertaining to the Site (see Section 7.2). • It should be recognised that housing targets are not fixed and are in a constant state of flux, nor are they a minimum target. Moreover, there appears to be a current housing shortfall against the dwelling target for Castle Hill. The LSPS's 2016 to 2036 target is for 6,500 new dwellings in Castle Hill, equating to 325 dwelling completions per year. The Great Sydney Urban Development Program data for the Castle Hill SA2s shows that an average of 179 dwellings have been completed yearly since the 2016/17 financial year (see the table below). The average number of approvals per year (300) also falls short of Castle Hill's target. Therefore, the proposed master plan will assist in achieving the target for transport-orientated housing within the Castle Hill Strategic Centre.

employment growth can keep pace with residential growth. In this context, it is considered unlikely that the proposed increase in residential opportunities on this site, at the expense of commercial outcomes, would satisfy the strategic merit test.

Completions data

SA2	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22
Castle Hill - Central	7	16	5	8	1	2	6	21	8	80
Castle Hill - East	3	3	1	9	5	26	1	2	1	
Castle Hill - North	9	6	12	6	37	13	12	4	11	437
Castle Hill - South	78	12	9	8	8	2	381	2	9	
Castle Hill - West	50	13	14	2	2	2	1		1	
Total	147	50	41	33	53	45	401	29	30	517

Approvals data

SA2	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Castle Hill - Central	31	16	28	14	13	20	24	45	104	304
Castle Hill - East	9	118	4	14	8	5	28	3	4	6
Castle Hill - North	23	16	18	13	59	29	946	25	25	27
Castle Hill - South	11	9	21	407	19	13	21	29	16	15
Castle Hill - West	11	14	18	6	2	3	2	3	1	1
Total	85	173	89	454	101	70	1,021	105	150	353

Figure 36 Annual Dwelling Completions and Approvals in the Castle Hill SA2s

Source: Greater Sydney Urban Development Program Dashboard

- The Proposal responds to strong demand for residential accommodation and requires minimal upgrades to local infrastructure to support it. Importantly, it seeks to provide critically needed public infrastructure to support the anticipated growth of the Castle Hill Strategic Centre, most notably a 4000 m2 public park, in addition to new roads, cycling infrastructure and pedestrian connections.
- Further, notwithstanding the anticipation of both the Northwest Rail Link Corridor Strategy (released in 2013) and the Hills Corridor Strategy (released in 2015) of a commercial only outcome on the Site, the more recent and up to date LSPS for the Hills Shire (released in 2019) envisions a mixed-use precinct, including residential and retail uses, which the Proposal seeks to provide. This is in line with the site's current B4 Mixed Use zoning in The Hills LEP 2019, which is sought to be retained expect for the proposed open space area that is to be appropriately zoned RE1 Public Recreation.
- The Economic Benefit Statement (**Appendix I**) supporting the Proposal demonstrates that the mixed-use approach sought results in significant and positive economic benefits for the Castle Hill Strategic Centre. This includes 930 ongoing jobs during the operational phase and a direct value add to the economy of \$106.8 million per annum.
- A Transport Impact Assessment that modelled the capacity of the local road network to accommodate the Planning Proposal's envisioned development uplift. It determined that the network could service the approximately 390 person trips via car the Proposal is anticipated to generate during the weekday PM hour. Compared to the previously approved (DA864/2015/JP), but no longer pursued, expansion of the Castle Towers Shopping Centre (see **Section 2.5.1**), the Planning Proposal will generate significantly

less traffic and thus have a lesser impact on the surrounding road network. For comparison purposes, the estimated traffic generation increase resulting from the expansion of Castle Towers Shopping Centre during the weekday PM peak hour and Saturday midday peak hour was +1,051 and +1,260 vehicle movements, respectively.

It is acknowledged that presentations have been made to Council Officers in previous meetings with respect to desired outcomes on the land. While some residential development may be appropriate on this site, the proposed land use mix of approximately 14% commercial floor space and 86% residential floor space does not align with the objectives of the prevailing strategic framework and any proposal should be amended to have greater regard to the job targets for the strategic centre and include residential development as a supplementary outcome on the site, rather than the predominant land use.

Section 7 demonstrates that the proposed masterplan, including its mix of residential and commercial space, aligns with the Site's strategic context for the following reasons.

- While the pre-consultation letter notes that The Hills Shire Council is on track to meet its 2026 housing target, the Planning Proposal will deliver housing in an ideal location for residential development within walking distance of open space, shops, services and public transport. These dwellings will help meet the longer-term forecast need of 207,500 new homes in The Hills district by 2036.
- As mentioned previously, housing targets are not fixed and are subject to constant pressure by external forces, including from population growth and market demand. The Proposal directly responds and aligns with Council's LSPS' vision for Castle Hill as a *"vibrant and active centre with office, retail, community facilities, recreation, cultural facilities, education and **increasing housing densities within walking distance of the Station**"*. The LSPS is more current than previous strategies that sought solely a commercial outcome on the Site, which is considered an outdated vision based on the analysis of the Planning Proposal.
- Council's Productivity and Centres Strategy and LSPS both identify a 'commercial core' within Castle Hill, which is the primary location for employment floorspace and functions to "manage the impact residential developments crowding out commercial activity" (Productivity and Centres Strategy, pg. 62.). The Site is appropriately located outside the commercial core yet still within walking distance of it and Metro Station to provide increased housing densities within walking distance of the Station per the Council's vision. Therefore, the master plan's proposed mix of residential and employment floorspace responds appropriately to the Site's strategic context by providing a vibrant mixed-use precinct with a range of dwelling types for residents seeking convenient access to the Castle Hill Strategic Centre within a higher density environment.
- Castle Hill's commercial core and the Norwest Business Park are the appropriate locations for predominantly employment-generating development. The Productivity and Centres Strategy acknowledges that the Norwest Business Park's B7 zoning best protects employment lands and that businesses are migrating to this area.
- The Planning Proposal will provide an appropriate apartment mix and design to improve housing choices for single groups and families.
- The Proposal delivers a genuine mixed-use precinct, with ground floor retail spaces, supermarket, food and drink tenancies, commercial podium floor space, showrooms and attractive public spaces for the community to meet and socialise.
- The completed precinct is anticipated to generate approximately 930 ongoing jobs to contribute to Castle Hill's jobs target.

Furthermore, the Site is not encumbered by significant constraints, such as strata ownership, threatened species, existing open space, heritage, steep topography or existing special uses that would inhibit residential development on other sites.

Built Form & Public Park

The development concept should demonstrate superior urban design outcomes to the current planning controls.

Section 4 of the Planning Proposal analyses alternatives, including assessing the proposed masterplan against a development concept utilising the current planning controls. The development concept using the existing planning controls was determined to offer minimal benefit to the community, as it lacked usable public open spaces and is less legible and, therefore, walkable. Furthermore, the scheme failed to provide a suitable height transition from Castle Hill's urban core to the residential neighbourhood to the west. Also, inferior outcomes in terms of solar access, cross ventilation, outlook, and acoustic and visual privacy would result, given the minimal spacing between building forms.

Any planning proposal that includes residential development should provide details of floor plate sizes, setbacks, site coverage, landscaped area, deep soil zones, car parking access and arrangements and be designed having regard to the other Development Control Plans adopted by the Hills Shire Council for high density development in the rail corridor.

The Architectural Statement prepared by Clarke Hopkins Clarke and Hatch Roberts Day (**Appendix C**) details floor plate sizes, setbacks, site coverage and car parking access and arrangements. The Landscape Masterplan prepared by Aspect Studios (**Appendix D**) details envisioned landscaping.

Any concept should also demonstrate compliance with the Apartment Design Guide.

The Architectural Statement prepared by Clarke Hopkins Clarke and Hatch Roberts Day (**Appendix C**) details floor plate sizes, setbacks, site coverage and car parking access and arrangements. The Landscape Masterplan prepared by Aspect Studios (**Appendix D**) details envisioned landscaping.

Development should be arranged on the site to minimise any overshadowing of public open space or communal open space.

The layout and orientation of buildings have been designed to maximise solar access to the centrally located public park between 11am and 2pm on 21 June. This was achieved by reducing the building heights of towers located at the north of the Site and orientating the towers on Lot B to maximise mid to early afternoon sun. This key design move encourages the community, workers and visitors to patronise the space during lunch hours. Further, the active play space, strategically located in the southern portion of the park, receives consistent solar access during these hours also to foster community interaction. See **Section 8.1.3** for further details.

The proposed inclusion of a public park is acknowledged, however it is also expected that sufficient private open space will be provided in addition to a public park. The concepts indicate a significant amount of private rooftop communal open space for residential uses, but it is unclear if there is any ground level private open space proposed. Council's recent Development Control Plans for high density development in the rail corridor provide guidance on the expectations for ground level communal open space.

The masterplan proposes ground level private open space as shown on the ground floor plans in **Appendix C**. The private open space at ground level is consistent with the design objectives under Council's Development Controls Plan for high density development.

It is noted that the public park is proposed to be dedicated to Council. The concepts indicate a high level of

The Proponent is open to engaging with Council as the Planning Proposal progresses to shape the public park's design and treatment to meet Council's requirements for dedication.

embellishment to the proposed park. If the park is intended to be dedicated to Council, further consideration should be given to the ongoing maintenance of the park long term. Council would expect materials that require frequent replacement (such as timber elements) to be avoided and substituted with longer-life durable materials. More detailed consideration of the whether Council wishes to accept the dedication of the public park will be required, also having regard to any adjustments to the proposed land use mix within the development and the satisfactory demonstration that communal open space requirements can be satisfied, without reliance on the proposed public park.

Infrastructure Demand

Any additional development uplift on the subject site in comparison to the current planning controls has not been accounted for in the current contributions framework. It should be noted that active open space provision was a key challenge for the Castle Hill North precinct and will remain a key limiting factor in the determination of serviceable residential growth for the remainder of Castle Hill Precinct.

The Planning Proposal responds to this key infrastructure challenge by providing for 4,000 m² of new public open space in the form of a local park with space for active and passive recreation. The new park will include an inclusive playground, informal multi-purpose sports court, fitness stations and areas for passive seating and walking. It will be facilitated by the Site's development and delivered at no cost to Council. The park will service existing residents in the Castle Hill North precinct and new residents at the Site, in addition to the wider surrounds.

Similarly, traffic is a critical constraint in Castle Hill, particularly with respect to the intersecting regional road network at the junction of Castle Hill Centre. Regional traffic modelling is currently underway to determine the capacity of the regional road network and any required infrastructure upgrades. The results of the regional traffic model are expected to be available at the end of 2022.

As discussed above, the Planning Proposal is accompanied by a Transport Impact Assessment that modelled the capacity of the local road network to accommodate the Planning Proposal's envisioned development uplift. It determined that the network could service the approximately 390 person trips via car the proposal is anticipated to generate during the weekday PM hour. Compared to the previously approved (but no longer pursued) expansion of the Castle Towers Shopping Centre (see **Section 2.5.1**), the Proposal will generate significantly less traffic and thus have a lower impact on the surrounding road network than previously assumed., which consequently frees up capacity for future development within the Castle Hill Strategic Centre.

The regional traffic modelling is underpinned by assumptions based on the yields within The Hills Corridor Strategy. It is therefore critical to note that the regional modelling will not account for the additional floor space proposed beyond this, nor does it factor in residential traffic generation from this site, as distinct from employment travel behaviours. It is recommended that you commence early engagement with Transport for NSW

The project team has met with Transport for NSW, as detailed in **Section 10**. The team will engage collaboratively with TfNSW to ensure alignment on infrastructure delivery objectives.

with respect to your proposal, to assist in addressing this matter throughout the application process.

It is recommended that you seek to engage with Schools Infrastructure NSW. The Proponent will engage with Schools Infrastructure NSW as part of the consultation strategy outlined in **Section 10.2**.

Further details are required with respect to the proposed elevations and levels of the pedestrian bridge to determine the accessibility and functionality of the proposed access. These details will be provided to Council's as the pedestrian bridge's detailed design progresses.

The Development concept should also demonstrate universally accessible through site links and pedestrian movements within the site. The development concept supports active and accessible through site links and pedestrian movements, as detailed in **Section 8.2.5**.

Submission Requirements and Planning Proposal Process

• Application Form, Owners Consent and completed Political Donations forms The Planning Proposal is accompanied by these documents.

• Planning Proposal Report, which addresses the Department of Planning and Environment's Local Environmental Plan Making Guideline and the matters outlined in this letter This document forms the Planning Proposal report.

• Master Plan/Urban Design Report **Appendix B**

• Architectural Plans, including Landscape Plans **Appendix B and C**

• Heritage Assessment Report addressing impact on nearby heritage items Heritage impacts are assessed in **Section 8.7**.

• Draft Development Control Plan **Appendix K**

• Traffic, Parking and Accessibility Report **Appendix F**

• Relevant environmental constraints reports See table of Appendices.

• Economic and Residential Demand Analysis An Economic Benefit Statement is included as **Appendix I**.

• Preliminary feedback from relevant government agencies, notably TfNSW & SINSW Preliminary feedback is outlined in **Section 10.1**.

• Local Infrastructure Analysis **Section 8.8** provides a local infrastructure analysis.

• Workshop presentation material The project team will develop and provide workshop presentation material.