



beam

Development Application Addendum Statement of Environmental Effects

Residential Flat Building
46-50 Cowan Road, St Ives

Prepared for Traders in Purple

08.04.26
24224

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Appendices

Appendix Title	Prepared by
A. Survey Plan	<i>ATS Land & Engineering Surveyors Pty Ltd</i>
B. Amended Architectural Plans	<i>Plus Architects</i>
C. Addendum Design Report	<i>Plus Architects</i>
D. Amended Design Verification Statement & ADG Assessment	<i>Plus Architects</i>
E. Amended Ku-ring-Gai DCP Compliance Assessment	<i>Beam Planning</i>
F. Cost Report	<i>MBM</i>
G. Amended Clause 4.6 Variation Request	<i>Beam Planning</i>
H. Amended Arboricultural Impact Assessment	<i>Vertical Tree Management & Consultancy</i>
I. Amended Transport Impact Statement	<i>Ason Group</i>
J. Amended Landscape Plans	<i>Loci Design Collective</i>
K. Geotechnical Report	<i>JK Geotechnics</i>
L. Preliminary Site Investigation	<i>EGA</i>
M. Amended Stormwater Report and Civil Plans	<i>BG&E</i>
N. Amended Acoustic Assessment	<i>Acoustic Logic</i>
O. Amended Waste Management Plan	<i>Colliers</i>
P. Amended Accessibility Letter	<i>Accessible Building Solutions</i>
Q. Amended BCA Report	<i>Certitude</i>
R. Structural Statement	<i>BG&E</i>
S. Services and Infrastructure Report	<i>Neuron</i>
T. Amended BASIX and Thermal Comfort Assessment Report	<i>Jensen Hughes</i>
U. Section J Report	<i>Jensen Hughes</i>
V. NatHERS Certificate	<i>Jensen Hughes</i>
W. Amended BASIX Certificate	<i>Jensen Hughes</i>
X. Fire Engineering Letter	<i>Incode Solutions</i>
Y. Water Services Letter	<i>Sydney Water</i>
Z. Construction Management Plan	<i>Traders in Purple</i>
AA. 3D model	<i>Plus Architects</i>

What You Need to Know

Where is the site?	46-50 Cowan Road, St Ives, 2075 (Lot 234 DP 1289200). The site falls within the St Ives Low and Mid-Rise Housing Inner Area as identified under Chapter 6 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP). It is positioned within an existing residential area, adjoining Pymble Golf Course to the west and within walking distance of St Ives Shopping Centre which functions as a key retail and commercial hub. The site benefits from high accessibility, being within walking distance of regular bus services that connect to major destinations including Gordon Station, Mona Vale, Macquarie University, Hornsby, and the Sydney CBD (QVB).
What is this DA for?	The DA is made on behalf of the Applicant, 50 Cowan Road St Ives Pty Ltd, an entity of Traders in Purple, for the construction of a 6 storey residential development that will utilise the provisions afforded under Chapter 6 – Low and Mid-Rise Housing of the Housing SEPP.
Why is it being lodged?	The proposal will deliver 76 new high amenity dwellings within an accessible location, in alignment with the NSW Governments push to deliver more well-located housing within the accord period. The site has been previously cleared under a prior DA and is well suited to accommodate the proposed density.
Does it comply with the relevant planning controls?	The proposed development generally complies with the relevant planning controls, as detailed in Section 5.0. The sloping topography of the site and the irregular levels created by the previous site preparation works results in a maximum height of 23.73m, exceeding the Housing SEPP non-discretionary standard by 1.73m. A Clause 4.6 Variation Request has been prepared to justify the exceedance in height. The height exceedance has been concentrated to the centre of the site and does not result in any discernible bulk or visual impacts.
What are the key impacts and how will they be managed?	A detailed environmental assessment of the proposed development has been undertaken in Section 6.0. As this scale of development is still emerging within the St Ives Town Centre low and mid rise area, the development has been sensitively designed to reduce the perceived bulk and scale of the building and ensure appropriate transition to the adjoining residences and open space. The interface of the development with adjacent residences and the Pymble Golf Course were key considerations in the design of the proposed development. The built form has been carefully modulated and articulated to ensure residents of the proposed development, and surrounding residents will not have a reduced level of amenity or privacy, as a result of the proposed development. The proposed landscaping strategy has sought to further integrate the development within the surrounding context by providing a mix of endemic and suitable exotic species that will be supported by sufficient deep soil areas and that are consistent with Ku-ring-gai Council's landscaping guidelines. The potential traffic impact of the proposal has also been assessed in detail. The proposal is expected to generate an additional 36 vehicular movements within the AM and PM, which equates to a one percent increase to traffic on nearby arterial and collector roads. Given the low traffic volumes, no material impact on the operation or performance of nearby intersections is anticipated, particularly given the site's proximity to key road corridors and the presence of traffic calming measures already in place along Cowan Road.
Who is responsible for approving it?	As the proposed development has an estimated development cost greater than \$30 million, the Sydney North Planning Panel will be the consent authority, under Schedule 6 of the State Environmental Planning Policy (Planning Systems) 2021.
Why should it be approved?	The development directly responds to the need to provide more housing in the Ku-ring-gai LGA. The proposal will deliver 76 well-located units that specifically respond to the objectives of the Ku-ring-gai Local Strategic Planning Statement, to: • Provide housing close to transport, services and facilities to meet the existing and future requirements of a growing and changing community. • Provide a range of diverse housing to accommodate the changing structure of families and households and enable ageing in place. The proposal will contribute 76 new dwellings to the market, where the NSW Government has set a target of 7,500 new dwellings in the Ku-ring-gai LGA by 2029.

1.0 Introduction

This Statement of Environmental Effects has been prepared by Beam Planning in response to the direction of the Sydney North Planning Panel on the 13 March 2026.

The development application (eDA0485/25) was originally lodged in September 2025 for the construction of a 6-storey residential flat building with basement car parking and associated ancillary works at 46–50 Cowan Road, St Ives. During the assessment process, the applicant team continued to engage with Council in an effort to address matters raised in the course of the application. However, given the statutory assessment timeframes, a deemed refusal appeal was filed in November 2025. Council subsequently advised that the application would be referred to the Sydney North Planning Panel and, in the context of the deemed refusal proceedings, recommended refusal of the application.

Since that time, the applicant has continued to work constructively to respond to the issues raised in Council's assessment and in submissions received during public exhibition. In this regard, a response to the Statement of Facts and Contentions (SOFAC) was provided on 13 February 2026, followed by amended plans and supporting documentation submitted on a without prejudice basis on 5 March 2026.

Those amendments were substantial and were prepared specifically to respond to the concerns raised by Council and the community. As the Planning Panel determination meeting was scheduled prior to the section 34 conciliation hearing, the applicant requested that the Sydney North Planning Panel defer determination of the application to allow consideration of the meaningful design changes that had been prepared and provided to Council as part of the without prejudice process. The Panel permitted the applicant to present those changes and, on 13 March 2026, resolved to defer determination of the application until 6 May 2026. The Panel also requested that the amended plans and supporting documentation be submitted to Council by 18 March 2026, and for Council to produce an assessment report that would enable the Panel to determine the application on 6 May 2026.

Accordingly, this Statement of Environmental Effects has been amended from the version originally lodged, to reflect the revised proposal.

In broad terms, the amended proposal incorporates a series of meaningful design changes, including a reduction in building height, refinement of the built form to ensure compliance with the floor space ratio control, improved solar access outcomes, relocation of the driveway, increased tree retention, removal of basement encroachment within the Cowan Road setback, a substantial increase in deep soil and communal open space provision, improved façade articulation, and amendments to internal layouts. These changes improve the integration of the development with the surrounding context and to protect the amenity of the surrounding residents. The changes are summarised below and described in further detail throughout this SEE.

2.0 Site Analysis

2.1 About the Site

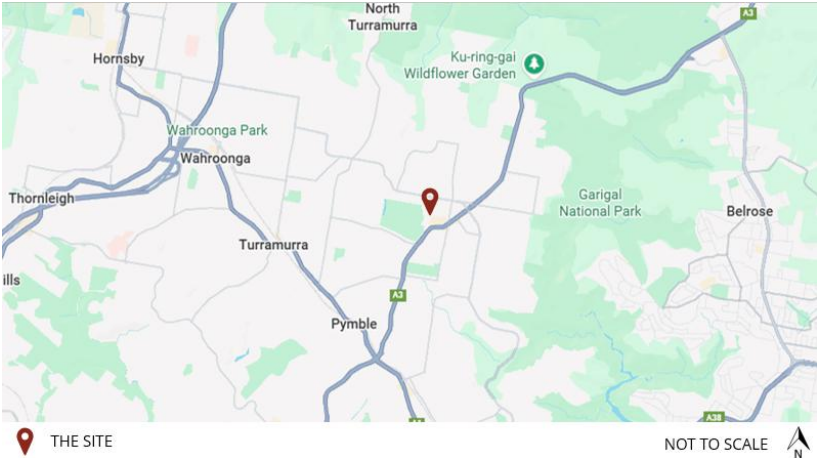
 Address	46-50 Cowan Road, St Ives, 2075	
 Legal Description	Lot 234 DP 1289200	
 Site Area	5,904m ² Site Survey at Appendix A	
 Owner	50 Cowan Road St Ives Pty Ltd (Traders in Purple)	

Figure 1 Location Plan



Key Information about the Site

The site (see **Figure 2**) is located within the suburb of St Ives within the Ku-ring-gai Local Government Area (LGA). St Ives is located 18km north of the Sydney Central Business District.

The site is situated in a unique position, within an existing residential area which adjoins the Pymble Golf Course to the west and is separated from the St Ives Village Green to the east by Cowan Road. The St Ives Shopping Centre is located off the Village Green and supports a wide range of retail offerings consistent with its allocation as a Town Centre under the Low and Mid-Rise Housing (LMRH) reforms.

The site has been previously cleared and levelled under a prior DA, and contains a sparse number of trees, located along the site boundaries.



Existing
Development



Figure 3 View of the north-western portion of the site, as observed 20 May 2025, facing west
Source: Preliminary Site Investigation by EGA



Figure 4 View of the central and northern portion of the site, as observed 20 May 2025, facing south-east.
Source: Preliminary Site Investigation by EGA

 Vegetation	The site has been previously cleared of most of the existing vegetation under a separate development approval (DA0168/19). Thirteen trees currently remain on site and are interspersed around the boundaries of the site.
 Site Access	Access to the site is provided from Cowan Road. Public pathways are provided on both sides of Cowan Road which provides connection from the site to the St Ives Shopping Centre to the south. There are 3 existing vehicular crossovers to the site.
 Heritage	The site is not an item of heritage significance or located near any heritage items or within a heritage conservation area.
 Topography	The site is located near the crest of a ridgeline, which is characterised by gentle slopes and undulations. It is located on the western side of one of these undulations and slopes down from Cowan Road to the west towards Pymble Golf Course at between about 4° and 5°. From Cowan Road to the golf course there is a change in elevation of about 6m.
 Bushfire	The site is not located on bushfire prone land.
 Easements	The property benefits from a registered drainage easement over Pymble Golf Course.

2.2 Surrounding Development

 North	To the north of the site is 52 Cowan Road, which is a 3 storey residential flat building with basement car parking. Density transitions down in scale to the north, with low density residential being the primary land use beyond Killeaton Road and on towards St Ives Chase.
 South	To the south of the site is 30-32 Cowan Road, St Ives a 3 storey residential flat building. Further south are single detached dwellings and the Pymble Golf Club clubhouse and the intersection of Cowan Road and Mona Vale Road. A Planning Proposal seeking to amend the land use controls for the Pymble Golf Club is currently in the finalisation stage, as is further described below.
 East	To the east of the site is St Ives Village Green which comprises a significant amount of public recreation area including multi-purpose playing fields, tennis courts, a playground and skatepark. St Ives shopping village is located to the southeast of the site. The centre provides essential neighbourhood services to the community, including supermarkets, community facilities such as the St Ives library and health services including a medical centre and dental clinic.
 West	To the west of the site is Pymble Golf Course which extends from Cowan Road in the East to Cowan Creek/ Merriwa Lane to the west. The Golf course is fringed by residential uses.

2.3 Planning Context

The following planning applications are relevant to the development history of the site and surrounding context.

2.3.1 Low and Mid Rise Housing Reforms

The NSW Government's Low- and Mid-Rise Housing Reforms (LMR) form part of a statewide strategy to address housing supply and affordability by enabling a greater diversity of housing typologies (the "missing middle") within established, well-located areas.

Stage 1 of the reforms commenced on 1 July 2024 and introduced permissibility for dual occupancies and semi-detached dwellings in the R2 Low Density Residential zone across most local government areas. Stage 2, commencing 28 February 2025, extends the reforms to enable terraces, townhouses and low- to mid-rise apartment buildings (up to six storeys) within 800 metres walking distance of nominated town centres and railway/light rail stations. These provisions override

inconsistent local environmental plan (LEP) controls through the application of non-discretionary development standards, which regulate building height, floor space ratio, setbacks, lot sizes and parking.

St Ives Shopping Centre is identified as a nominated town centre under the Housing SEPP. The subject site at 46–50 Cowan Road is located approximately 350 metres walking distance from St Ives Shopping Centre and is zoned R3 Medium Density Residential. Accordingly, the site is identified as being within the “inner area” for the purposes of applying the Housing SEPP controls.

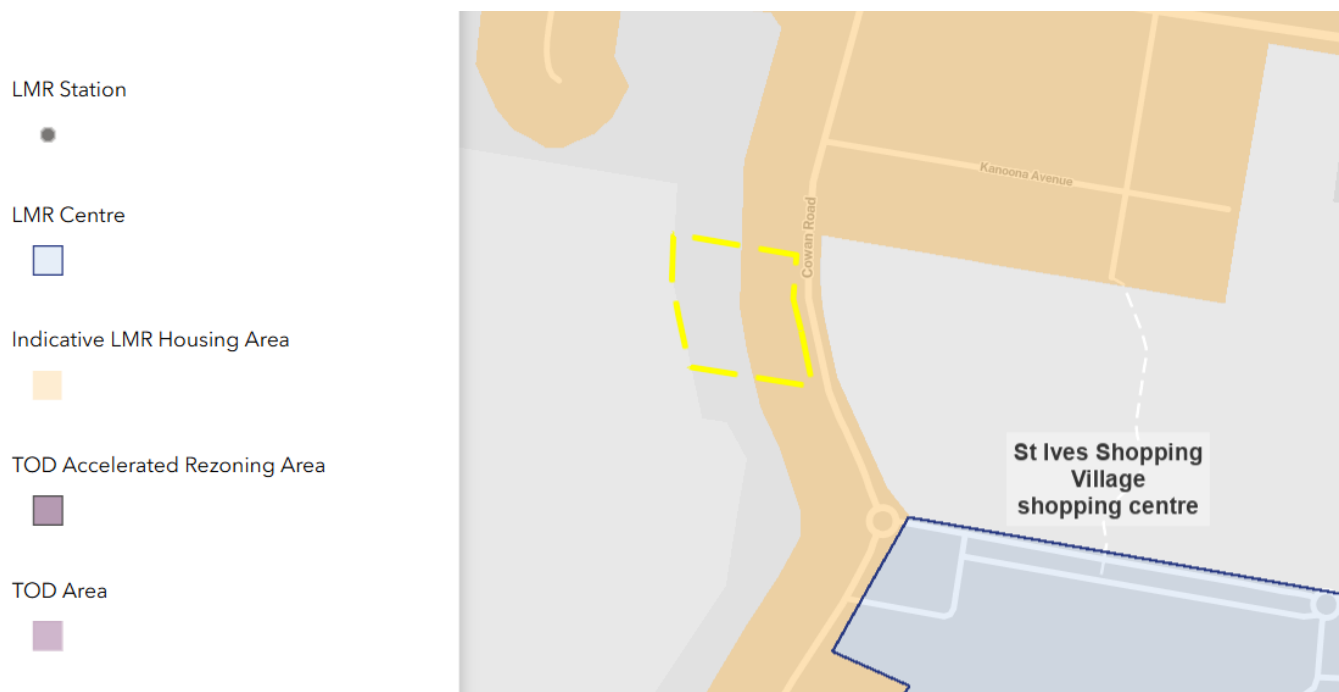


Figure 5 Low and Mid-Rise Centre Map

Source: NSW Department of Planning

The low and mid-rise housing reforms will catalyse a shift in the physical context and built form of developments in proximity to St Ives Shopping Centre, including along Cowan Road. The SEPP permits the development of residential flat buildings up to 22m tall or 6 storeys in the “inner” LMR areas. As such, the revised controls will enable a transition from predominantly low-rise detached housing to mid-rise apartment and townhouse developments. This will introduce a more urban built form with greater building heights, higher yields, and increased population density within walking distance of retail, services, and public transport.

The proposed development reflects the intended planning outcome for sites within the inner area of a nominated centre under the Housing SEPP. It achieves a built form consistent with the Low- and Mid-Rise Housing provisions and delivers a high-quality design that is responsive to the site’s urban context and parkland setting.

Over time, the application of these provisions to surrounding land will facilitate a gradual transformation of this part of St Ives from a predominantly low density streetscape to a cohesive midrise residential neighbourhood. This transformation will support the NSW Government’s strategic objectives for housing diversity and supply, while concentrating growth in areas with established infrastructure and services.

2.3.2 DA0270/22 – 46-50 Cowan Road

There is an existing DA applicable to the site – DA0270/22. The DA was for the demolition of existing structures on the site and the construction of a 3 storey multi-dwelling housing development containing 25 dwellings, basement parking and associated works at 46-50 Cowan Road, as pictured below.



Figure 6 Photomontage of approved DA0270/22, viewed from Cowan Road



Figure 7 Photomontage of approved DA0270/22, viewed from Pymble Golf Course

The DA was determined for approval in June 2023 by the Land and Environment Court (LEC) following a successful S8.7 appeal against the deemed refusal by Ku-ring-gai council. The Council's refusal was based on a range of planning, design, and amenity concerns, including:

- **Non-compliance with Ku-ring-gai Development Control Plan (KDCP):** The proposal failed to satisfy the KDCP requirements relating to deep soil landscaping, building setbacks, and upper-level setbacks, particularly along the Cowan Road frontage.
- **Inadequate Landscape Response:** The landscaping scheme was considered inconsistent with the established character of the area and did not provide an appropriate garden setting. Concerns were also raised about inadequate tree replenishment and a lack of clarity regarding tree retention and removal.
- **Built Form and Design Impacts:** The design of the western rear building included subterranean rooms and resulted in poor interface with adjoining residential properties. The development was also assessed as having adverse amenity impacts on neighbouring dwellings, particularly at 30–32 Cowan Road.
- **Amenity:** The development was found to be non-compliant with solar access requirements for the proposed townhouses.

These issues were addressed during the subsequent appeal process, resulting in the approval of the DA by the LEC. The approval was contingent on the surrender of DA0168/19 which was approval for a 99 bed residential aged care facility at the site. The demolition of existing structures, removal of trees and site preparation works including remediation have been enacted at the site under this consent. The site is therefore suitably prepared for development.

In the preparation of this development application, the applicant has sought to ensure that the issues previously raised by Council under DA0270/22 are not replicated. Particular attention has been paid to protecting the amenity of surrounding properties, achieving compliance with council's setback controls and achieving a landscape design that responds appropriately to the site's character and context. These matters are addressed in further detail in **Section 4** of this report.

2.3.3 Pymble Golf Club – PP-2022-2519

In proximity to the subject site, a Planning Proposal (PP-2022-2519) is currently awaiting finalisation for land at 4, 12 and 14 Cowan Road, St Ives, known as Pymble Golf Club. The proposal seeks to amend the Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015) to facilitate future residential development on part of the golf club site while retaining the balance of the land for ongoing recreational use. The Planning Proposal includes the following key elements:

- **Rezoning:** Part of the site is proposed to be rezoned from RE2 Private Recreation to R4 High Density Residential to enable residential flat buildings adjacent to the St Ives Local Centre and Village Green. The remainder of the site is to retain the RE2 zoning to support the continued operation of the golf course and associated facilities, including a clubhouse, parking, and maintenance infrastructure.
- **Building Height:** An amendment to the Height of Buildings Map is proposed to permit a maximum height of 17.5 metres, supporting built form outcomes of approximately 3 to 5 storeys in height.
- **Floor Space Ratio:** The proposal seeks a maximum FSR of 0.92:1 to enable appropriate development density aligned with the site's strategic location.
- **Heritage Listing:** 12 and 14 Cowan Road, which contain existing timber cottages, are proposed to be listed as items of local heritage significance under Schedule 5 Environmental Heritage of KLEP 2015.

The Planning Proposal is also accompanied by an Urban Design Report, which is intended to inform the preparation of a site-specific Development Control Plan (DCP) to guide future development on the site. An indicative visualisation of the development is provided in the figure below.

This nearby proposal represents a significant shift in the planning framework for the area surrounding the St Ives Local Centre, facilitating increased residential density in an appropriate location while maintaining recreational and heritage values.



Figure 8 Photomontage of indicative proposal for the Pymble Golf Club

3.0 The Proposed Development

3.1 Summary

This development application seeks approval for the construction of a residential development that will utilise the provisions afforded under Chapter 6 Low and Mid-Rise Housing of the Housing SEPP. The development has been amended since it was first lodged in September 2025, to address matters raised by the Community and Council during public exhibition. The amendments comprise deliberate design moves which seek to improve the integration of the development with the surrounding context and to protect the amenity of the surrounding residents.

Specifically, under the amended proposal consent is sought for:

- Site preparation works including the removal of 1 tree.
- Bulk excavation to accommodate the three (3) storey basement structure.
- Construction of two (2) x six (6) storey residential flat buildings.
- On-site car parking and loading within three (3) basement levels comprising 178 car spaces, accessed from Cowan Road.
- Landscaping.
- Extension and augmentation of infrastructure and utilities as required.

The key components of the development are listed in the table below. Architectural drawings and a Design Report prepared by Plus Architecture illustrating the proposed development are included at **Appendix B** and **Appendix C**. An artist Impression of the proposed development is shown at **Figure 9** and the proposed site plan is provided at **Figure 10**.



Figure 9 Proposed development (as initially lodged) viewed from Pymble Golf Course

Source: Plus Architecture



Figure 10 Site Plan

Key Numbers

Table 1 Summary of key development metrics

Component	Proposal
Site Area	5,904m ²
Proposed Land Uses	Residential flat building
GFA	12,986m ²
FSR	2.20:1
Maximum Height	Building A: 23.73m (6 storeys) Building B: 22.09m (6 storeys)
Apartments	76
Vehicular Access	A new vehicular crossover is proposed near the centre of the site off Cowan Road.
Car Parking	178 car parking spaces will be provided across three basement levels, and will comprise: 155 residential parking spaces shared across basement 01 and basement 02 (including 1 car share space and 1 car wash space) 19 visitor parking spaces on the lower ground floor
Site Coverage	2,588m ² (44%)
Canopy Coverage	27%
Deep Soil Area	1,747m ² (29.6%)

3.2 Detailed Description

3.2.1 Key Urban Design Principles

The proposed development adopts a context-sensitive and design-led approach that responds to the site's physical characteristics, surrounding built form, and broader landscape setting. The site is located within the St Ives Town Centre low and mid rise housing area. The designation of the site as being within this area is reflective of the capacity of the site to support additional density. The project team acknowledge that developments of this scale, whilst permissible, are still emerging throughout the neighbourhood. Therefore, efforts have been made to reduce the perceived bulk and scale of the building by implementing the following key urban design principles:

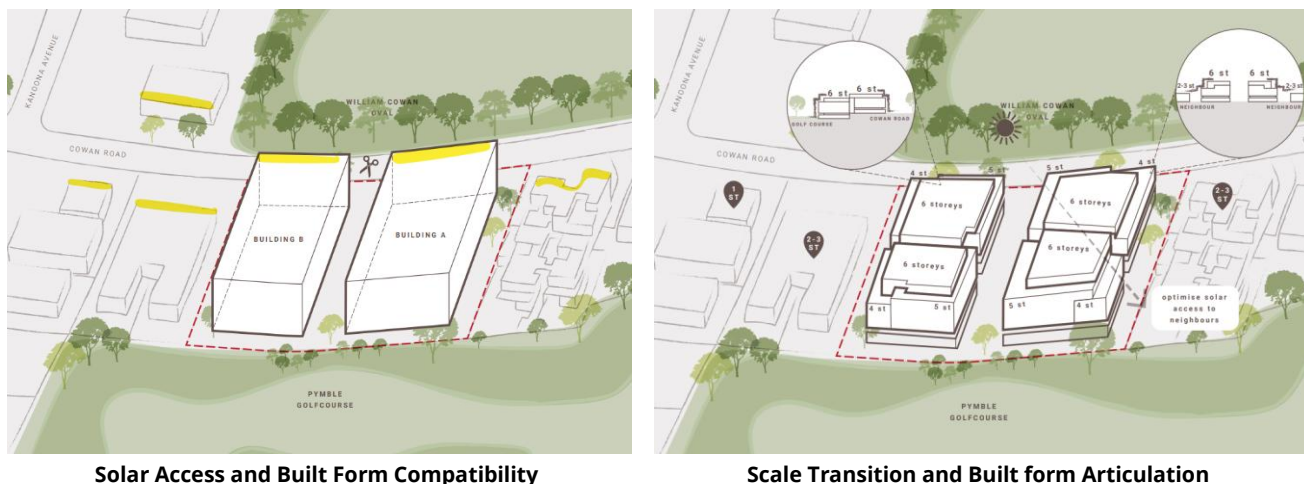
- **Topography and Site Integration:** The site exhibits a natural fall of approximately 5 metres from Cowan Road toward the Pymble Golf Course. The built form has been sensitively modulated to follow the topography, with a split-building arrangement and stepped massing that minimises visual bulk and integrates the development into the landscape.
- **Neighbourhood Character and Built Form Compatibility:** Efforts have been made to reduce the perceived bulk and scale of the building by providing an appropriate street setback and landscaped frontage to suit the streetscape, maintaining appropriate setbacks to adjoining neighbours and stepping the built form to maintain a maximum height of six storeys. The built form steps to the east and west to provide a sympathetic interface with adjoining residences and a combination of horizontal and vertical articulation and material variation ensures visual interest and reinforces a contemporary, high-quality built form outcome.
- **Scale Transition and Built Form Articulation:** The proposal comprises two buildings of up to six storeys, carefully articulated to reduce perceived bulk and scale. Upper storeys are set back to create a recessive form. Lower podium elements (4–5 storeys) address Cowan Road, providing a human-scale interface and a respectful transition to neighbouring 1–3 storey development.
- **View Sharing and Visual Connectivity:** The design preserves key visual corridors, maintaining northward views to William Cowan Oval and southward views to Pymble Golf Course. These view lines are reinforced through the separation of built forms and strategic siting, enhancing visual permeability across the site.
- **Solar Access and Amenity:** Building orientation and separation have been optimised to maximise solar access to both the development, adjoining properties and the golf course. Recesses between the buildings allow for daylight penetration, cross ventilation, and enhance residential amenity. The configuration ensures compliance with ADG solar access objectives and minimises overshadowing impacts.
- **Landscape and Setback Strategy:** Generous setbacks to all boundaries have been provided to enable deep soil planting, reinforce the landscape character of the locality, and provide a vegetated buffer to neighbouring dwellings. These setbacks also support the integration of communal open space at ground level, contributing to residential amenity.



Topography and View Sharing



Setbacks and massing



Solar Access and Built Form Compatibility

Scale Transition and Built form Articulation

Figure 11 Design Strategies

3.2.2 Earthworks and Excavation

Site preparation works, including the demolition of existing buildings, the removal of some trees and remediation has been undertaken at the site under the consent for DA0270/22.

Earthworks and excavation to a depth of 10m will be required for the basement structure.

The proposal will also encompass the removal of 1 existing tree from the site. 16 trees on the site/ surrounds are proposed to be retained. Extensive tree planting is proposed under the development as is detailed in **Section 3.2.3** below.

3.2.3 Landscaping

The landscaping proposed at the site has been designed to complement the architecture of the building and improve the contextual relationship of the site to its surrounds. The overall intent of the proposal is to increase the tree canopy to better complement the garden setting of the development.

The existing site has been cleared of several trees under prior development approvals at the site, leaving the site vacant apart from 13 trees that remain along the site boundaries. Under the proposal, only 1 tree is required to be removed as result of the encroachment of the proposed building footprint. The retention of existing trees has been prioritised on the site, with the 16 trees on the site and adjacent to the site to be preserved through the use of tree protection strategies where required.

Additionally, the proposal includes substantial new tree plantings to increase the tree canopy coverage of the site to 27%. The proposed tree canopy is greater than the required 15% required by the LMR Tree Canopy Guide for Low and Mid Rise Housing. The planting character reflects the diverse indigenous, native, and exotic species found in surrounding streets and gardens. This includes towering Eucalypts, deciduous trees, and native rainforest species, as pictured in **Figure 12**.

These new plantings will be supported by the generous provision of deep soil areas which are to be located along the site boundaries and between the buildings. Overall, the site provides 1,747m² (29.6%) of deep soil exceeding the 15% requirement under the non-discretionary standards of the Housing SEPP.

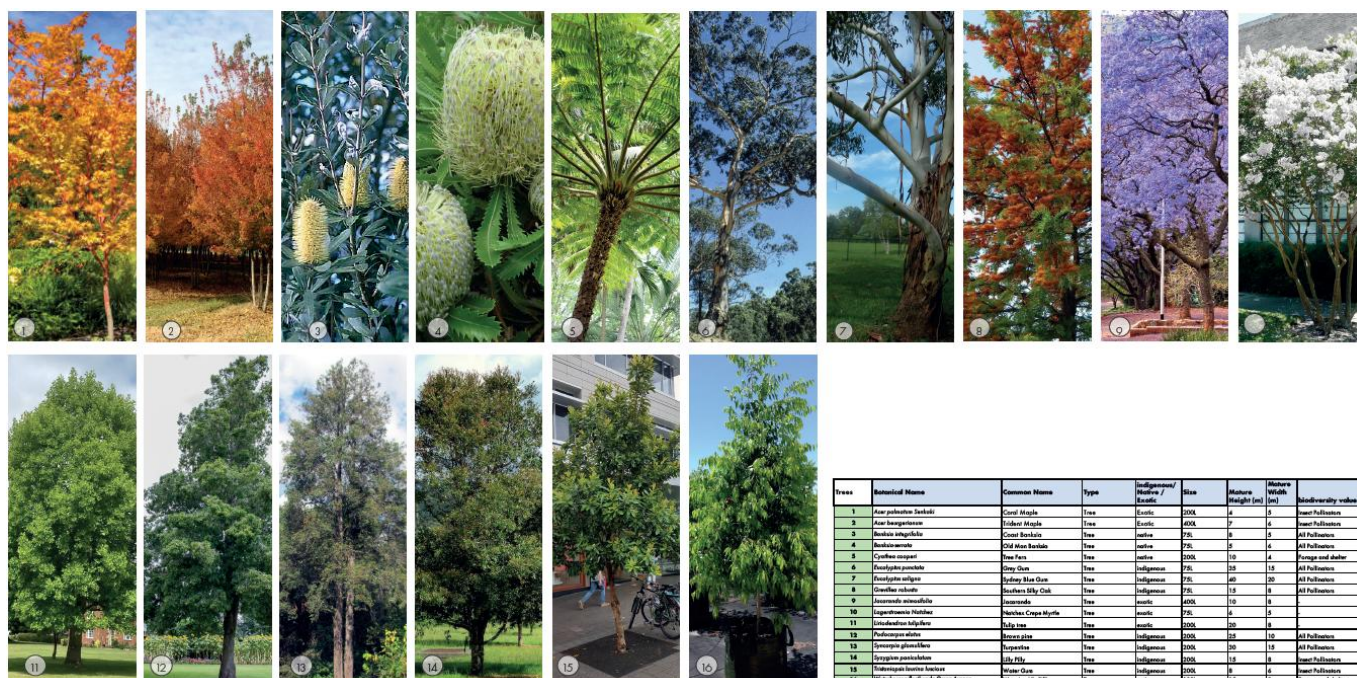


Figure 12 Indicative Tree Species

A variety of landscaped spaces are proposed across the development which will soften the built form and provide spaces for residents to enjoy. These spaces are identified on the Landscape Masterplan at **Figure 13** below and include:

- **Central linear park:** A linear park is proposed to guide residents into the development from Cowan Road. The park will comprise a series of immersive spaces which have been designed to be small and intimate, exaggerating the sense of enclosures which contrasts to the expansive green spaces adjacent to the site. The park, which comprises of an upper and lower section, will guide residents to the building lobby's and will extend to the lower ground floor of the Golf Course side of the development, where residents will be able to enjoy further passive recreation spaces whilst enjoying the view out to the Golf Course.
- **Lower forecourt:** A forecourt is proposed to be positioned at the base of the development, interfacing with Pymble Golf Course. This forecourt will be separated from the Golf Course by low walls, in order to minimise trespassing to the Golf Course, whilst preserving significant views.
- **Boundary planting:** New trees are proposed within all setbacks of the development to provide privacy screening to adjoining developments, create visual interest at the Cowan Road frontage, and to improve the amenity of residents through urban greening. Mature trees have been co-located with deep soil areas to ensure they will grow to a mature size. Feature trees are proposed within the frontage of the development to mark the entrance.
- **Private terraces:** Each residential apartment has access to a landscaped private terrace. This landscaping will assist in the separation of private and communal spaces at the ground floor and lower ground floor, whilst contributing to screening and amenity at the upper levels.

Collectively, these landscaped interventions will not only soften and integrate the proposed built form into its garden setting but will also restore and enhance the site's contribution to the established green character of Cowan Road, delivering canopy coverage and deep soil planting that exceed statutory requirements and establish a resilient, biodiverse landscape that will mature and thrive over time.



KEY

1. Existing 2 x Magnolia grandiflora (T31 and T32) to be retained and protected.
2. Existing Jacaranda T02, to be retained and protected.
3. Large canopy tree in landscape setback.
4. Feature deciduous tree to mark entrance and provide street tree greening (when there is not enough space on the verge).
5. New mixed exotic, native and indigenous trees along the street frontage as de-facto street trees. Tree character matches the eclectic street tree diversity of the context.
6. Massed planting, bespoke paving and seat at the entrance.
7. Off street bicycle parking.
8. Low decorative edge beyond basement at garden entry.
9. Deep soil for large trees in front of private terraces at Cowan Street frontage.
10. 1600mm high picket fencing to define private terraces.
11. Private terrace gardens.
12. Permeable paving at fire egress and access to services.
13. Cluster of existing mixed deciduous trees to be retained (refer to arborists report for detail).
14. Large trees in deep soil zone on southern boundary for additional screening.
15. Existing boundary screening planting maintained on northern and southern interface.
16. Existing masonry wall retained.
17. New lapped and capped 1.8m tall timber fence.
18. Deep soil for planting large sized screening trees.
19. Landscape setback zone with steel edge to define boundary and shrub planting along low boundary fence.
20. Level 1 Green Roof.
21. Large canopy trees for screening on northern boundary in deep soil zone.

NOTE:

- Refer to architects drawings for critical information and dimensions of setbacks.
- Refer to arborists drawings for critical information on the Tree Protection and Retention Plan.

Figure 13 Landscape Masterplan

3.2.4 Façade and Materiality

As detailed within the Design Report at **Appendix C**, the design of the façade and proposed materiality has been carefully considered to create a unique identity, using a consistent and restrained palette of brick, concrete, glass and metal. The proposal's materiality will enable the development to seamlessly integrate within the local context. This is further detailed in **Section 6.1.4**.



Figure 14 Facade concept Cowan Road side

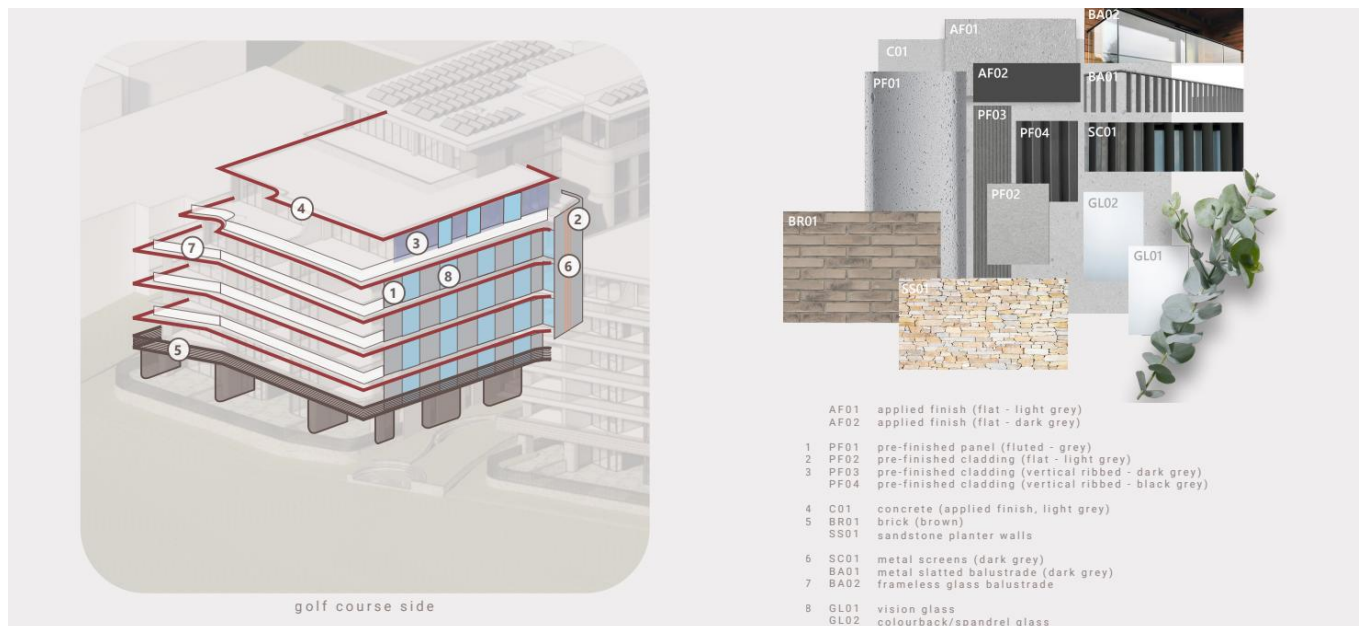


Figure 15 Facade concept Golf Course side

3.2.5 Transport and Parking

The following transport and parking arrangement is proposed:

- Vehicular access to the lower ground and basement levels will be provided via a new vehicular cross over off Cowan Road.
- 178 car parking spaces including:
 - 19 visitor car spaces within the lower ground level
 - 75 residential spaces within basement 01
 - 82 residential spaces within basement 02
 - 1 car wash space
 - 1 car share space
- Loading dock within the lower ground floor
- Refer to **Section 6.2** for further detail.

3.2.6 Stormwater Management

The proposal will comprise the implementation of a stormwater management system in accordance with Council's requirements. This system will comprise an On-Site Detention (OSD) tank and Water Sensitive Urban Design measures including a rainwater tank. The proposed stormwater management system is discussed further in **Section 6.6**.

4.0 Stakeholder Engagement

This chapter provides a summary of the engagement that was undertaken prior to the lodgement of the proposal, the initial feedback received and how the development as submitted responded to this feedback. Ongoing engagement with the community and other stakeholders will also be carried out through the assessment of this DA.

4.1.1 Pre-Lodgement Engagement Undertaken Identified Stakeholders for Engagement

The following key stakeholder groups were identified as having an interest in the proposal:

- Pymble Golf Club Board
- Cowan Road Action Group & Friends

The proponent met with these two community groups prior to the lodgement of the DA. Details of the discussions held with the community are outlined below.

Pymble Golf Club Board

The project team met with the Pymble Golf Club Board on the 3 July 2025. During this meeting the Proponent provided a presentation of the proposal, before fielding questions from the Board. The key issues raised and how these have been addressed are identified within the table below.

Table 2 Feedback from the Pymble Golf Club Board

Matter Raised	Response
The PGCB were concerned with the potential overshadowing of the golf course. They requested the DA include overshadowing diagrams to clearly demonstrate and assess the impacts on the fairway.	Detailed overshadowing diagrams have been provided at Appendix A and assessed in Section 5.1 . The analysis shows that during the winter solstice (the shortest day of the year and therefore worst case) the development only results in additional overshadowing of the fairway for 1 hour between 9-10am, with the fairway receiving sun throughout the remainder of the day.
The PGCB were concerned about the potential of golf balls impacting the residential apartments, including golfer entering the property to retrieve their balls. Equally they were concerned about residents	At the time of the meeting, no fence was proposed along the boundary. Following the meeting a fence was introduced
The PGCB raised the broader concerns in the community with traffic and the cumulative impact of the proposal with their planned development on the Killeaton Street and Mona Vale Road intersections.	The traffic assessment (see Appendix X and Section 5.2) assesses the impact of the proposal having regard to the Golf Course's Planning Proposal. The traffic assessment found the development would produce low traffic volumes, resulting in no material impact on the operation or performance of nearby intersections.

Cowan Road Action Group (CRAG) & Friends

The project team also engaged with the CRAG & Friends community group on the 5 August 2025. A summary of the key matters raised by this Group and how they have been addressed in the proposal is provided in the table below

Table 3 Feedback from the CRAG

Matter Raised	Response
If the building is too close to the Golf Course and future residents complain it may result in the Golf Course constructing a large fence which will impact on their outlook and property values. Members of CRAG suggested reversing the setbacks to increase the setback to the golf course by reducing it to Cowan Road.	Traders has designed the setbacks to mitigate impacts on the Golf Course. Providing a greater setback at this point in lieu of Cowan Road will result in non-compliances. A fence has now been incorporated to manage the impacts of golf balls. Traders are also willing to include in the Contracts of Sale a disclosure about the proximity of the golf course and the likelihood of those with an aspect overlooking the golf course, encountering golf balls on part of their lot to ensure that all purchasers have clear expectations and understanding of the issue.
The development will make the existing traffic problems at the intersections at Mona Vale Road and Killeaton Street worse. Members of CRAG requested whether Traders could signalise the intersection of Killeaton Street?	This development has minimal impact on the intersection. Any agreement for Traders to signalise the intersection would be subject to Council agreement and diversion of developer contributions to this infrastructure.
Residents in the adjacent buildings at 30-32 and 52 Cowan Road asked if there could be more privacy measures along the side boundary windows?	Whilst the proposal complies with the minimum separation under the ADG, Traders are reviewing where privacy is of concern and will propose treatments.
The location of the driveway adjacent to 30-32 Cowan Road will result in adverse vehicle, in particular garbage truck noise on that building, and it was requested by the residents that the driveway be moved to the centre of the frontage.	Relocating the driveway to the centre of the frontage would adversely impact the streetscape of the future residents. The driveway and basement design which allows for garbage trucks to collect waste on site within the basement, will largely mitigate the impact of the garbage trucks which are an existing and necessary function of any development.
Residents with apartments on the northern side of 30-32 Cowan Road raised concern with the loss of light to their apartments.	An analysis of the overshadowing impacts of the proposal on 30-32 Cowan Road is provided at Section 6.1.3 . The assessment demonstrates that the neighbouring residences will receive solar access in accordance with the requirements of the ADG. This is consistent with the anticipated strategic density for the area envisioned by the LMR provisions.

5.0 Planning Assessment

This section provides an assessment of the matters the consent authority must consider when determining a development application under Section 4.15(1) of the Environmental Planning & Assessment Act 1979 (EP&A Act).

5.1 Strategic Planning Framework

This section identifies the key strategic issues that are relevant to the assessment of the project, including the proposal's consistency with relevant Government policies, the strategic planning framework, the relationship with other surrounding development and any planning agreements, set out in **Tables 3**.

Table 4 Strategic Framework

Strategic Plan	Strategic Context
NSW Housing Strategy – Housing 2041	The NSW Housing Strategy is a 20-year housing strategy that is built upon four pillars: • Supply: Includes the amount, location and timing of the supply of new housing. Planning for the supply of new housing should respond to environmental, employment and investment considerations, and population dynamics. • Diversity: Considers different types of housing and looks at how a diverse choice of housing can reflect the needs and preferences of households. • Affordability: Recognises people live in diverse tenures based on their income and circumstances, and that housing should be affordable, stable and supportive of their aspirations and wellbeing. • Resilience: Includes matching housing to community and environmental issues, so people, communities and their homes are safe, comfortable and resilient. The proposal supports these four pillars, and the NSW Housing Strategy more broadly, increasing the supply of housing in the Ku-ring-gai Local Government Area (LGA), providing a range of apartment sizes and adaptable apartments to cater to a wide variety of tenants.
Greater Sydney Region Plan and North District Plan	The North District Plan, which supports the Greater Sydney Region Plan, sets a 20-year strategic vision for the North District through a series of Planning Priorities aligned with the broader objectives of the Region Plan. A key focus of the District Plan is ensuring that new housing is delivered in appropriate locations to meet the demand for diverse housing types, tenure, and price points, while also considering design quality and accessibility. It emphasises the importance of coordinating housing with infrastructure delivery to support liveable, walkable, and cycle-friendly neighbourhoods that offer safe and accessible connections to shops, services, and public transport. The Plan also identifies opportunities to increase residential density through targeted local infill development. The proposed development is consistent with the Planning Priorities set out in the District Plan, particularly: • Planning Priority N5: Providing housing supply, choice and affordability, with access to jobs, services and public transport. The proposal will deliver 76 new high-quality dwellings within walking distance of St Ives Shopping Village, thereby supporting housing choice and improving access to local employment and services. • Planning Priority N12: Delivering integrated land use and transport planning and a 30-minute city. The site's location within a designated Low and Mid-Rise (LMR) area and its proximity to public transport and local services demonstrate a strong alignment with the objective of integrating housing with transport infrastructure. It is acknowledged that both the Region Plan and District Plan remain relevant strategic considerations in planning and rezoning decisions. However, these plans were prepared by the former Greater Cities Commission under the previous Liberal State Government, which placed a stronger emphasis on employment-led planning outcomes. In contrast, the current Labor Government, through the Department of Planning, Housing and Infrastructure, has prioritised housing supply. While the strategic plans have not yet been updated to reflect this policy shift, this evolving focus has created a level of uncertainty in the interpretation and application of these documents, particularly when navigating strategic land use matters.
Ku-ring-gai Local Strategic Planning Policy 2020	The Ku-ring-gai Local Strategic Planning Statement (LSPS) provides a 20 years vision for land use planning within the Ku-ring-gai LGA. The proposed development is consistent with the following LSPS planning priorities: • K3. Providing housing close to transport, services and facilities to meet the existing and future requirements of a growing and changing community

	• K4. Providing a range of diverse housing to accommodate the changing structure of families and households and enable ageing in place
Ku-ring-gai Local Housing Strategy	The Ku-ring-gai Local Housing Strategy (LHS) sets out the strategic direction for housing in the Ku-ring-gai LGA over the next 20 years. The LHS sets a dwelling target of 92,000 new dwellings within the north district by 2036. Ku-ring-gai Council have been targeted with the delivery of 10,660 new dwellings between 2016 and 2036. In addition to the 20-year target, the NSW Government has set a five-year housing target of 7,600 new dwellings by 2029 for Ku-ring-gai, as part of its broader objective to deliver 377,000 new homes across the state. The proposal will contribute to meeting this target and will importantly provide increased diversity of housing types within St Ives. The proposal complies with the following planning principles: • Housing Priority H1 – Manage and monitor the supply of housing in the right locations • Housing Priority H2 – Encourage Diversity and choice of housing • Housing Priority H3 – Increasing liveability, sustainability and area character through high-quality design

5.2 Statutory Framework

5.2.1 Acts

The relevant State Legislation is discussed in **Table 5**.

Table 5 Relevant NSW Acts of Parliament

Acts	Comments
Water Management Act 2000	Permanent groundwater to a depth of between 2.5m and 7m above the proposed bulk excavation level was encountered by JK Geotechnics during site investigations undertaken to inform the Geotechnical Report at Appendix K. Excavation is proposed to a depth of approximately 10m and will therefore impact the groundwater table. Further modelling is to be undertaken within 6 months of lodgement to confirm the extent of the groundwater. Approval will be sought separately under Section 89 of the Water Management Act following the completion of these investigations.

5.2.2 State Environmental Planning Policies

The relevant state environmental planning policies are assessed in **Table 6**.

Table 6 Summary of consistency with State Environmental Planning Policies

Plan	Provision	Comments
SEPP (Resilience and Hazards) 2021	Chapter 4 of the State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP) is applicable to the remediation of land. Consent must not be granted to the carrying out of any development on land unless – (a) it has considered whether the land is contaminated, (b) 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, and (c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.	The site has been previously remediated and is suitable for the proposed development, as outlined in Section 2.2.2 and the Preliminary Site Investigation at (Appendix L).
SEPP (Housing) 2021	Chapter 4 of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP) provides non-discretionary development standards for the	A detailed assessment against the Housing SEPP is provided in Table 5 .

Plan	Provision	Comments
	construction of residential apartment developments. Chapter 6 of the Housing SEPP provides additional development standards and non-discretionary development standards that are applicable to development for the purpose of residential flat building within a LMR Housing area zoned for residential purposes.	
SEPP (Sustainable Buildings) 2022	<i>State Environmental Planning Policy (Sustainable Buildings) 2022 (SB SEPP)</i> introduces thermal performance, energy use and embodied emissions for non-residential development and residential development.	Through the implementation of multiple ESD initiatives, the development will meet and exceed industry benchmarks and schemes, as well as reduce emissions and consumption of energy. A BASIX Certificate is located at Appendix W and a BASIX and thermal assessment report is attached at Appendix T. The BASIX Certificate includes calculations of embodied emissions.
SEPP (Planning Systems) 2021	As the development has a capital investment value of more than \$30 million, the proposal is a class of development described in Schedule 6 of the SEPP. Accordingly, Section 2.15 of the EP&A Act applies and the functions of the consent authority under Part 4 of the Act will be exercised by the Sydney North Planning Panel.	The proposed development has an estimated development cost of \$93,316,312. This is confirmed in the Cost Report attached at Appendix F .

Table 7 Assessment against State Environmental Planning Policy (Housing) 2021

Clause	Provision / Standard	Proposal
Chapter 4 Design of Residential Apartment Development		
Clause 145 Referral to Design Review Panel for Development Applications	2) before determining the development application, the consent authority must refer the application to the design review panel for the local government area in which the development will be carried out for advice on the quality of the design of the development.	The consent authority will refer the DA to the Kuring-gai Design Review Panel for advice on the quality of the design of the development.
Clause 147 Determination of Development Applications and Modification Applications for Residential Apartment Development	(1) Development consent must not be granted to residential apartment development, and a development consent for residential apartment development must not be modified, unless the consent authority has considered the following— (a) the quality of the design of the development, evaluated in accordance with the design principles for residential apartment development set out in Schedule 9, (b) the Apartment Design Guide, (c) any advice received from a design review panel within 14 days after the consent authority referred the development application or modification application to the panel.	The quality of the design of the development, in accordance with the design principles for residential apartment development is assessed in detail by Plus Architecture (refer to Appendix D). The proposal has been assessed against the provisions of the ADG in Appendix D and Section 6.1.3 .
Clause 148 Non-discretionary Development Standards for Residential Apartment Development	(2) The following are non-discretionary development standards— (a) the car parking for the building must be equal to, or greater than, the recommended minimum amount of car parking specified in Part 3J of the Apartment Design Guide, (b) the internal area for each apartment must be equal to, or greater than, the recommended minimum internal area for the apartment type	The proposal has been designed to comply with Part 3, Part 4D and Part 4C of the ADG. A compliance assessment has been undertaken by Plus Architecture and is embedded within the Design Report attached at Appendix C and ADG Assessment at Appendix D .

	specified in Part 4D of the Apartment Design Guide, (c) the ceiling heights for the building must be equal to, or greater than, the recommended minimum ceiling heights specified in Part 4C of the Apartment Design Guide.	
Clause 149 Apartment Design Guide Prevails Over Development Control Plan	(1) A requirement, standard or control for residential apartment development that is specified in a development control plan and relates to the following matters has no effect if the Apartment Design Guide also specifies a requirement, standard or control in relation to the same matter— (a) visual privacy, (b) solar and daylight access, (c) common circulation and spaces, (d) apartment size and layout, (e) ceiling heights, (f) private open space and balconies, (g) natural ventilation, (h) storage.	Detailed assessment of the proposed development against the provisions of the ADG is included in Appendix D and Section 6.1.3 . A detailed assessment of the proposed development against the provisions of the Ku-ring-gai DCP 2015 is provided at Appendix E .
Chapter 6 Low and Mid Rise Housing		
174 Development permitted with development consent	Development for the purposes of residential flat buildings is permitted with development consent on land to which this chapter applies in a low and mid rise housing area in Zone R2 Low Density Residential or R3 Medium Density Residential.	The proposed development is for the purpose of a residential flat building in a R3 medium density residential zone. Residential flat buildings are permitted with consent in the R3 zone under Section 174 of the Housing SEPP.
175 Development standards—low and mid rise housing inner area	(1) This section applies to land in a low and mid rise housing inner area in Zone R3 Medium Density Residential or R4 High Density Residential. (2) Development consent must not be granted for development for the purposes of residential flat buildings with a building height of up to 22m unless the consent authority is satisfied the building will have 6 storeys or fewer.	As the proposal is not seeking consent for a built form of less than 22m, this clause does not technically apply, however has been addressed for completeness. The proposed development consists of two buildings. Building A will comprise a maximum height of 23.73m whilst Building B is proposed to be a maximum height of 22.09m. A variation of 1.73m (9.23%) is proposed to the maximum building height control of 22m for Building A. A variation of 0.09m (0.41%) is sought to the 22m height control for Building B. These variations are the result of the sloping and irregular existing ground level across the cleared site and is supported by a clause 4.6 variation request appended to the SEE.
177 Landscaping—residential flat buildings or shop top housing	(1) This section applies to land in a low and mid rise housing area in Zone R3 Medium Density Residential or R4 High Density Residential. (2) Development consent must not be granted for development for the purposes of residential flat buildings or shop top housing unless the consent authority has considered the Tree Canopy Guide for Low and Mid Rise Housing, published by the Department in February 2025.	The Tree Canopy Guide outlines that there is a minimum requirement to provide 15% of the site area as tree canopy and 7% of the site area as deep soil. The proposal achieves the minimum requirements providing 29.6% deep soil (min 7% required) and 27% canopy coverage (min 15% required)
178 Minimum lot size for residential flat buildings or shop top housing	(1) This section applies to development for the purposes of residential flat buildings or shop top housing on land in a low and mid rise housing area in Zone R3 Medium Density Residential or R4 High Density Residential. (2) A requirement specified in another environmental planning instrument or development control plan in relation to the	Section 178 applies to the development, therefore the minimum lot size requirements of the Ku-ring-gai LEP do not apply to the development.

	following does not apply to development that meets the standards in section 180(2) or (3)— (a) minimum lot size, (b) minimum lot width.	
180 non-discretionary development standards—residential flat buildings and shop top housing in Zone R3 or R4	(1) This section applies to development for the purposes of residential flat buildings or shop top housing on land in a low and mid-rise housing area in Zone R3 Medium Density Residential or R4 High Density Residential. (2) The following non-discretionary development standards apply in relation to development on land in a low and mid-rise housing inner area— (a) a maximum floor space ratio of 2.2:1, (b) for residential flat buildings—a maximum building height of 22m, (c) for a building containing shop top housing—a maximum building height of 24m.	The proposed development seeks consent for an FSR of 2.2:1 which complies with the non-discretionary standard. A variation is proposed to the 22m height limit, which is supported by a clause 4.6 variation request.

5.2.3 Ku-ring-gai Local Environmental Plan 2015

An assessment against the relevant clauses of Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015) are assessed in **Table 8**.

Table 8 Assessment against Ku-ring-gai Local Environmental Plan 2015

Clause	Standard	Proposal	Comment
Clause 2.3 Zone objectives and land use table	R3 medium density zone	Residential flat building	Residential flat buildings are prohibited in the R3 medium density zone under the KLEP 2015. However, residential flat buildings are permitted at the site by virtue of clause 174 of the LMR housing provisions within Chapter 6 of the Housing SEPP. The Housing SEPP prevails over the KLEP 2015.
Clause 5.1 Minimise subdivision lot size	1200 sqm	No subdivision is proposed under this DA. The subject site is 5,904sqm which meets the minimum lot size requirement of the LEP.	
Clause 4.3 Height of buildings	11.5m	Building A: 24.03m Building B: 22.39m	The development seeks to utilise the non-discretionary standards of Chapter 6 of the Housing SEPP to permit development for the purpose of RFB's to a maximum height of six storeys. The development proposes a variation of 1.73m (7.56%) to the maximum building height control of 22m designated by the LMR provisions of the Housing SEPP as a result of the sloping and irregular existing ground level across the cleared site. This variation has been supported by a Clause 4.6 variation request, appended to the SEE.
Clause 4.4 Floor space ratio	0.8:1	2.2:1	The proposal seeks an FSR of 2.2:1 which is compliant with the non-discretionary standards of Chapter 6 of the Housing SEPP which prevails over the KLEP 2015 FSR control
Clause 5.21	This site is not subject to flooding, and is not within a flood planning area. Nevertheless, the proposal has been designed with consideration of impacts to stormwater flows. The proposed stormwater management system, outlined in Section 6.6 will ensure that stormwater flows are managed and will not adversely impact on the environment.		
Clause 6.1 Acid sulfate soils	N/A The site is mapped as containing class 5 acid sulfate soils and is not within 500m of adjacent class 1,2,3 or 4 acid sulfate soils. Clause 6.1(3) of the LEP requires that development consent must not be granted under this clause for the carrying out of works unless an acid sulfate soils management plan has been prepared for the proposed works		

Clause	Standard	Proposal	Comment
		in accordance with the Acid Sulfate Soils Manual and has been provided to the consent authority. The Preliminary Site Investigation attached in Appendix L confirms that the site is in an area with no known occurrence of acid sulphate soils and that no further assessment of acid sulphate soils is warranted.	
Clause 6.2 Earthworks	When deciding whether to grant development consent for the earthworks the consent authority is to consider the following: (a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development, (b) the effect of the development on the likely future use or redevelopment of the land, (c) the quality of the fill or the soil to be excavated, or both, (d) the effect of the development on the existing and likely amenity of adjoining properties, (e) the source of any fill material and the destination of any excavated material, (f) the likelihood of disturbing relics, (g) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area, (h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.	Development consent is sought for earthworks under this DA. The scope of works proposed is outlined in Section 6.3. The impact of the proposed earthworks to the environment and neighbouring uses has been considered by the relevant technical consultants, as follows. • The proposal will not detrimentally impact drainage patterns or soil stability. A stormwater management system is proposed which will control the flow of stormwater and ensure the stormwater quality is appropriate. Additionally, the geotechnical assessment confirms that the proposed excavations can be undertaken subject to further assessment at the detailed design stage. • The proposed earthworks are required for the redevelopment of the site and will enable the development of a high quality residential flat building on the site. • The site has been remediated under the prior development approval. Therefore no adverse impacts are to occur from the excavation of soil/fill. • The Geotechnical assessment has considered the impact to adjoining developments and has provided recommendations to ensure stability. The findings of the geotechnical assessment have been reaffirmed by a structural engineer. • The site has been previously disturbed, therefore the probability of distributing relics is considered to be low. We welcome a condition to manage unexpected finds. • The proposal will be carefully constructed to minimise impacts to waterways and environmentally sensitive areas. Construction will be undertaken in accordance with the Construction Management Plan at Appendix Z, and impacts from stormwater runoff and erosion will be further managed in accordance with the Stormwater Management Report and Civil Plans. • Further mitigation measures are outlined in Section 5.0.	
Clause 6.5 Stormwater and water sensitive urban design	The proposed development has incorporated water sensitive urban design principles and integrated stormwater management to minimise the adverse impact of stormwater to adjoining properties, native bushland, waterways and groundwater systems. This is further detailed in Section 6.6 of this SEE.		
Clause 6.6 Requirements for multi dwelling housing and residential flat buildings	Despite any other provision of this Plan, development consent must not be granted for the erection of multi dwelling housing or a residential flat building on a lot in a residential zone unless the lot has an area of at least 1,200 square metres and minimum dimensions (width and depth) of at least— (a) if the area of the land is less than 1,800 square metres—24 metres, or (b) if the area of the land is 1,800 square metres or more—30 metres. The subject site exceeds the minimum site area requirements, with an area of 5,904sqm, and a width and depth of greater than 30m.		

5.2.4 Development Control Plans

The proposal is generally consistent with the objectives of the Ku-ring-gai Development Control Plan (DCP) and the relevant development controls. Key provisions in the DCP are identified in **Table 9** and discussed in the following sections of this environmental assessment. A comprehensive compliance assessment is provided at **Appendix E**.

Table 9 Extract of Ku-ring-gai DCP

Section	Control	Comments/ Proposal	Compliance
Part 7 Residential Flat Buildings			
Site layout			
10	Three hours of direct sunlight between 9am and 3pm on 21st June is to be maintained to the living rooms, primary private open spaces and any communal open spaces within: i) existing residential flat buildings and multi-dwelling housing on adjoining lots; residential development in adjoining lower density zones. Note: Where an adjoining property does not currently receive the required hours of solar access, the proposed building is to ensure that solar access to neighbours is not reduced by more than 20%.	Shadow modelling was undertaken to evaluate solar access impacts to the living rooms, primary private open spaces and any communal open spaces (referred to as units) of the multi-dwelling housing at 30–32 Cowan Road. The detailed sun eye view analysis confirms that between 9am to 3pm on the Winter Solstice (21 June), 6/7 units (86%) achieve 2 hours solar access to living areas, whilst 7/7 units (100%) achieve 2 hours solar access to balconies and terraces. This complies with the Apartment Design Guide (ADG) requirement that a minimum of 70% of dwellings within an adjoining development should achieve this solar access benchmark.	Justified.
Setbacks			
5	Residential flat buildings are to meet the following side and rear setback requirements to ensure deep soil, landscaping and tall trees are accommodated to all sides of the building: i) a minimum of 6m from the side boundary for all levels up to the fourth storey (see Figure 7A.3-3). a minimum of 9m to the fifth storey and above (see Figure 7A.33).	The balconies of the apartments at the rear of the site, minorly protrude into the 6m and 9m setback areas. Please refer to Section 6.1.1 for detailed justification.	Justified.
Encroachments			
12	Ground floor private terraces/courtyards may encroach into the setback areas (see Figure 7A.3-6) provided there is a minimum setback to the terrace edge/courtyard wall of: 8m from the street boundary. 4m from the side and rear boundaries.	The ground floor terraces, interfacing with Cowan Road have been reduced to comply with the 8m front boundary setback, Landscape screening and fencing will be used to delineate between private open space and communal open space and screen the private open spaces from Cowan Road. Minor encroachments into the rear setback area is also proposed, however the proposal will comply with the 4m requirements. Where intrusions into the setback zone occur, this has been balanced with	Justified.

Section	Control	Comments/ Proposal	Compliance
	7m from the side and rear boundaries where adjoining land is zoned differently for lower density residential development.	areas that sit back further than the setback line. This ensures there is architectural articulation and variation within the built form.	
15	No more than 15% of the total area of the street setback area is to be occupied by private terraces/courtyards	No more than 15% of the front setback area is to be occupied by private terraces. Importantly, the main building line remains set back 10 metres from the Cowan Road frontage, maintaining compliance with the primary setback requirement and preserving the broader spatial rhythm of the street. The terraces are designed to step down from the street level, following the natural slope of the site. This approach significantly reduces their visual prominence and helps integrate them into the surrounding landscape. Additionally, dense landscaped screening is proposed within the setback area to soften the appearance of these terraces and minimise their impact when viewed from the public domain. The design ensures that the overall presentation to Cowan Road remains consistent with the intended landscape character, and that the terraces do not dominate the setback. This minor encroachment is considered to be low impact and justified in the context of the site's topography and the desire to enhance residential amenity without compromising the intent of the setback control.	Yes.

Building Separation

2	The minimum separation between residential buildings on the development site is to comply with the following controls: Up to 4th Storey i) 12.0m between habitable rooms/balconies; (ii) 9.0m between habitable rooms/balconies and non-habitable rooms; iii) 6.0m between non-habitable rooms. 5th Storey and above iv) 18.0m between habitable rooms/balconies; v) 13.5m between habitable rooms/balconies and non-habitable rooms; vi) 9.0m between non-habitable rooms.	Separation between the buildings and adjoining buildings has been provided to ensure visual privacy is achieved. The proposal provides the required 12m separation between the buildings up to the fourth storey. Beyond this, where an 18m building separation is typically required between habitable dwellings, a reduced building separation distance is proposed. This is addressed in detail in Section 5.1.1 of the SEE.	Justified.
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Site Coverage

1	The site coverage may be up to a maximum of 30% of the site area, provided that the deep soil landscaping requirements in Section A Part 7A.6 A Deep Soil Landscaping can be met	A maximum site coverage of 30% of the site area is required under the DCP. The proposal achieves 44% site coverage which is in excess of the maximum 30%. Despite the variation, the applicant has endeavoured to ensure that a high quality outcome is achieved at the site in terms of balancing the built form provision with proposed landscaping. The proposal also meets the objectives of the site coverage control which are to:	Justified
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Section	Control	Comments/ Proposal	Compliance
		- To ensure development is consistent with the desired future landscape and built character of the area. - To protect and improve the tree canopy within Ku-ring-gai. - To provide viable deep soil landscaping within developments and between residential developments on neighbouring sites. - To minimise impervious surfaces that generate stormwater runoff. - To provide adequate spaces between buildings for common areas that support quality gardens around the building This is assessed in detail in Section 6.1.1 of the SEE.	

Deep soil and landscaping

1	Residential flat development on sites greater than 1800m ² or more are to have a minimum deep soil landscaping area of 50% of the site.	The amended proposed increases the provision of deep soil by 500m ² , increasing the provision of deep soil to 29.6% deep soil across the site based on 3m x3m dimensions. This exceeds the minimum 7% required under the Housing SEPP. The SEPP controls prevail over the DCP.	Justified.
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Apartment Mix and Accessibility

1	A range of apartment sizes (one, two, three bedroom) and a mix of types are to be included within the development.	The proposed development will primarily provide 3-bedroom apartments, with a small proportion of 2-bedrooms and 4-bedrooms. The amended proposal has increased the number of 2-bedroom units provided. This mix has been determined through market testing with analysis showing a greater demand for family size apartments within St Ives.	Justified.
2	A mix of one, two and three-bedroom apartments are to be located on the ground level.	The development does not propose any one bedroom/ studio dwellings.	

6.0 Environmental Assessment

This section assesses the key planning issues and likely environmental, social, and economic impacts of the development on the natural and built environment.

6.1 Built Form and Urban Design

The proposed development is considered to achieve a high-quality built form and urban design outcome that is responsive to its context and consistent with the desired future character for the area. It has been carefully designed to address key considerations, including the interface with low-scale recreation areas and neighbouring residential uses, privacy and bulk and scale.

6.1.1 Bulk and Scale

The scale of the development has been informed by the LMR housing provisions, leveraging off the site's proximity to St Ives Shopping Village and its accessibility.

Low and Mid Rise Housing Controls

The proposed bulk and scale of the development has been designed with consideration of the Low and Mid-Rise Housing provisions of the State Environmental Planning Policy (Housing) 2021 (Housing SEPP). These provisions apply to residentially zoned land located within 800 metres walking distance of nominated town centres and train or light rail stations.

St Ives Shopping Centre is identified as a nominated town centre under the Housing SEPP, as shown in the figure below. The subject site at 46–50 Cowan Road is located approximately 350 metres walking distance from St Ives Shopping Centre and is zoned R3 Medium Density Residential. Accordingly, the site is identified as being within the “inner area” for the purposes of applying the Housing SEPP controls.

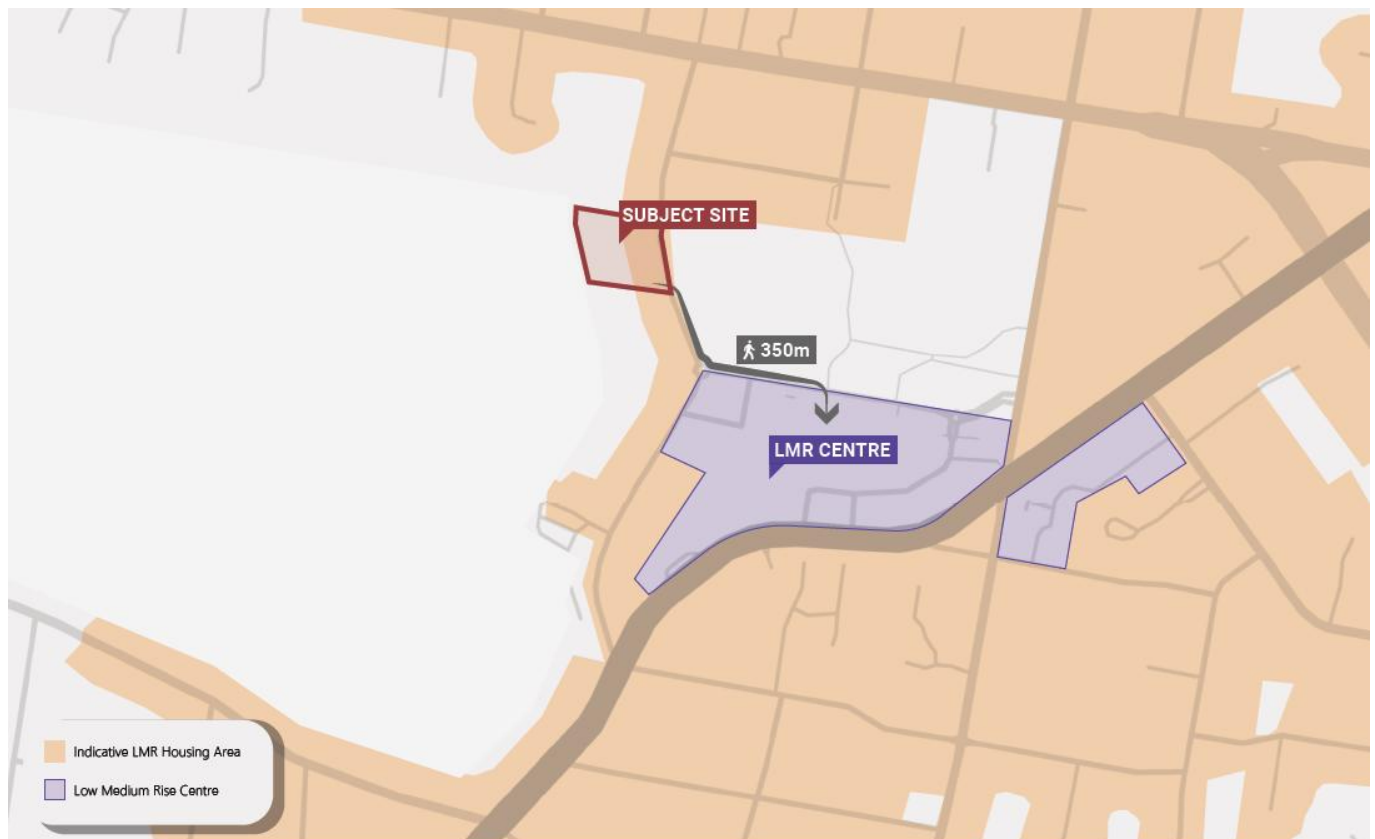


Figure 16 Low Mid Rise Housing Area

Source: Plus Architecture Design Report

Under the Housing SEPP, the development is subject to both development standards and non-discretionary standards. The built form outcome for the proposal has been guided by the development standards and non-discretionary development standards for sites within an inner area. These provisions are outlined in detail below:

175 Development standards—low and mid rise housing inner area

(1) This section applies to land in a low and mid rise housing inner area in Zone R3 Medium Density Residential or R4 High Density Residential.

(2) Development consent must not be granted for development for the purposes of residential flat buildings with a building height of up to 22m unless the consent authority is satisfied the building will have 6 storeys or fewer.

(3) Development consent must not be granted for development for the purposes of a building containing shop top housing with a building height of up to 24m unless the consent authority is satisfied the building will have 6 storeys or fewer.

180 Non-discretionary development standards—residential flat buildings and shop top housing in Zone R3 or R4

(1) This section applies to development for the purposes of residential flat buildings or shop top housing on land in a low and mid rise housing area in Zone R3 Medium Density Residential or R4 High Density Residential.

(2) The following non-discretionary development standards apply in relation to development on land in a low and mid rise housing inner area—

(a) a maximum floor space ratio of 2.2:1,

(b) for residential flat buildings—a maximum building height of 22m,

(c) for a building containing shop top housing—a maximum building height of 24m.

The proposed development comprises two residential flat buildings that respond to the natural slope of the site and are designed to comply with the six-storey height limit stipulated in Section 175 of the Housing SEPP. On the western portion of the site, the building presents as six storeys from the lower ground level to Level 4. On the eastern portion, the building comprises six storeys from the upper ground level to Level 5. Due to the uneven and sloping topography of the site, there is a minor portion of the buildings which will contain 7 storeys. This variation is attributed to the uneven topography of the site, where benching occurs. Importantly, when viewed from the Cowan Road and Pymble Golf Course frontages the proposal reads as 6 storeys.

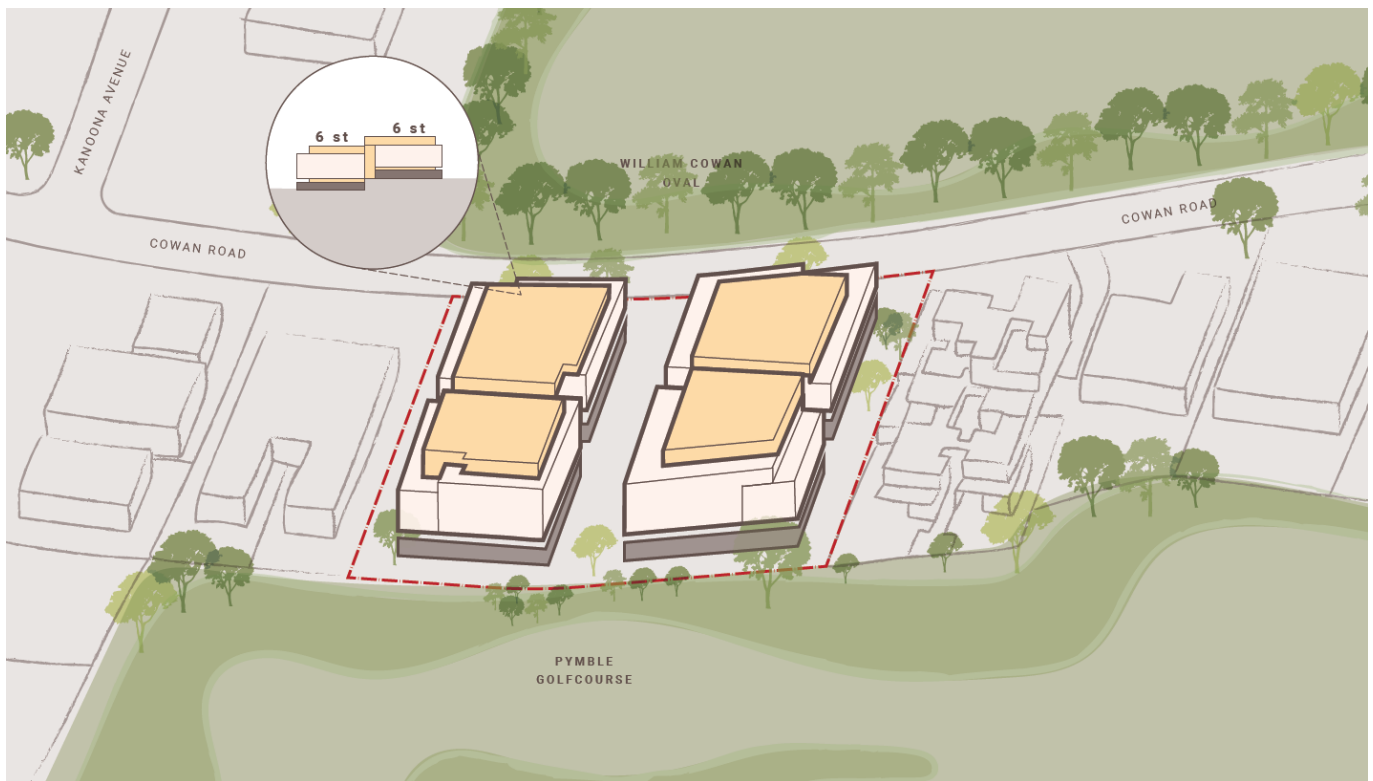


Figure 17 Stepped built form

Source: Plus Architects Design Report

While the majority of the proposed development complies with the 22-metre maximum building height limit prescribed under Section 180 of the Housing SEPP, a minor variation is sought in relation to a localised portion of both buildings. This variation has been reduced from what was originally proposed. The design has been amended such that the roof slab RL has reduced by 300mm. In addition, further coordination with services consultants have allowed the reduction on the height of the solar cells on the roof. Overall, the bulk of the building has reduced in height, with only minor portions projecting past the 22m height plane.

For Building B, a variation of 0.41% is proposed, where the rooftop mechanical plant and lift overrun extend marginally above the prescribed height plane. For Building A, a variation of 7.56% is sought. This exceedance is limited to a portion of the penthouse level and the associated rooftop mechanical plant and lift overrun, resulting primarily from the site's sloping topography and the irregularity of the existing ground level by which height is measured.

In both buildings, the non-compliant elements have been set back from the street and centrally located on the roof to minimise visual impacts when viewed from both Cowan Road and the adjacent golf course. The design ensures that overshadowing of the public domain is avoided and that the height exceedance will have negligible visual or environmental impacts.

The proposed height variation has been comprehensively assessed and is considered to be consistent with the objectives of the development standard. It results in a high-quality built form that is compatible with the desired future character of the area. A detailed justification for the height exceedance is provided in the Clause 4.6 Variation Request (see **Appendix G**), appended to this Statement of Environmental Effects.

The proposed development seeks consent for an FSR of 2.2:1 in full compliance with the applicable non-discretionary standard.



Figure 18 Height plane diagram

Source: Plus Studios Design Report

Physical Layout

The proposed site layout has been holistically and sensitively designed to respond to the surrounding context, maximise residential amenity, and deliver a high-quality built form outcome that integrates seamlessly with its environment.

The basement footprint has been deliberately constrained to remain within the building envelope, allowing for the provision of genuine deep soil zones and meaningful landscaping (refer to **Figure 19**). This enables the establishment of mature vegetation and contributes positively to urban greening and site ecology.



Figure 19 Basement extent

Source: Plus Studios

The east-west orientation of the buildings has been carefully planned to optimise solar access to apartments and to capitalise on outlook and views toward the adjacent Pymble Golf Course and William Cowan Oval. This orientation ensures that the development meets required solar access benchmarks while enhancing the internal amenity of dwellings.

The proposal also responds appropriately to the site's existing topography, with the split building form allowing the development to step with the terrain and ensuring the building height does not exceed six storeys. This approach not only reduces visual bulk but also contributes to a more sympathetic interface with the surrounding built environment.

A generous 10-metre setback from Cowan Road further reduces the perceived massing of the development and aligns with the existing streetscape rhythm. The uppermost (penthouse) level is further recessed from both the street frontage and side boundaries, preserving human scale at the ground plane and minimising visual and privacy impacts to neighbouring properties.

A central break in the built form enhances the articulation of the building and introduces a view corridor between William Cowan Oval and the Pymble Golf Course, reinforcing visual permeability across the site and creating a more open and connected public domain interface. The inclusion of the entry pavilion provides a clear building entry and access point to the site.

The design has been amended to improve visual connectivity through the site, particularly along the Cowan Road frontage. A visually permeable security line is now proposed at Cowan Road, and the doors to the entry pavilion have been removed to enhance visibility through the site and maintain a view corridor from Cowan Road towards the golf course. The security line has also been designed to reference the character of existing security treatments along Cowan Road. In addition, key view corridors remain fully unimpeded from Level 01 upwards, while landscaping between the

proposed buildings reinforces a visual green connection between Cowan Oval and Pymble Golf Course. The proposed side boundary setbacks further assist in maintaining important view corridors from both Cowan Oval and the golf course.

Overall, the development is consistent with the objectives of the relevant planning controls, including the applicable Development Control Plan (DCP), and delivers a contextually responsive and well-articulated design that balances built form, landscape, and amenity outcomes.



Figure 20 View from the Golf Course (as originally lodged)

Source: Plus Studios Design Report

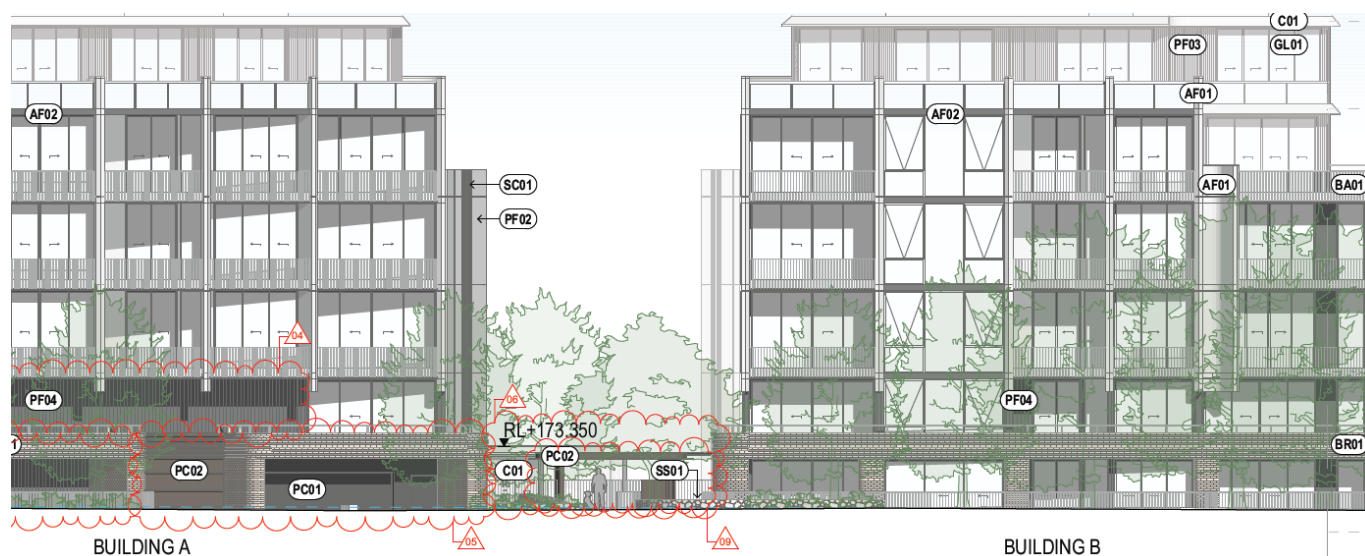


Figure 21 Elevation view of the Central Pavilion

Source: Plus Studios

Site Coverage

The development has a total site coverage of 44% of the site area (2,588m²) when calculated in accordance with the Kuring-gai DCP. This is a technical variation to Part 7A.5 of the DCP which requires a maximum site coverage of 30% (1,771.2sqm). It is noted that the site coverage control does not anticipate the LMR controls which post-date the DCP and include non-discretionary development standards for height and FSR meaning where there is compliance, there application cannot be refused on these grounds. The development complies with the height and FSR controls (except for

some minor rooftop protrusions due to the site's topography) which indicates that the DCP does not contemplate this level of strategic density.

Despite the variation, the applicant has endeavoured to ensure that a high quality outcome is achieved at the site in terms of balancing the built form provision with proposed landscaping as:

- The development achieves compliance with the 2.2:1 Floor Space Ratio (FSR) requirement prescribed under the Low and Mid Rise Housing Code of the Housing SEPP.
- The proposal as amended also complies with the minimum requirements for deep soil area and tree canopy cover under the SEPP, thereby reinforcing the leafy character that defines the Ku-ring-gai LGA.
- The site layout provides for well-considered separation between buildings, generous landscaping around the building footprint, and minimisation of impervious surfaces, addressing stormwater management objectives.

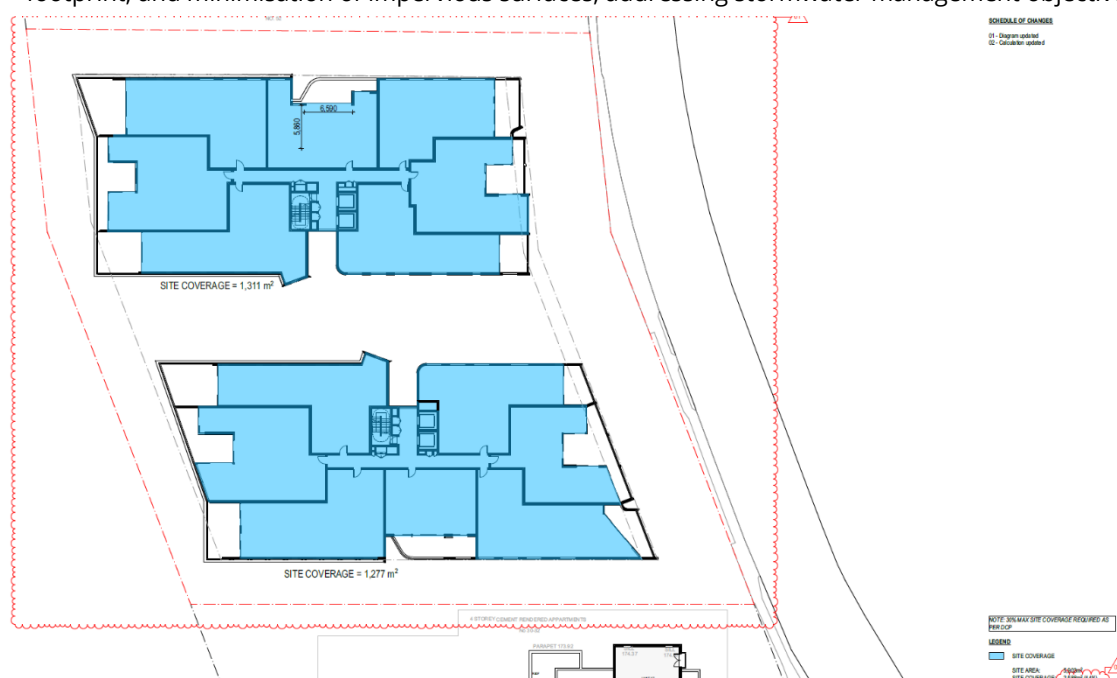


Figure 22 Site Coverage Diagram

Source: Plus Architecture Design Report

The proposal continues to satisfy the objectives of Part 7A.5 of the DCP, which seeks to balance built form, landscaping, and residential amenity as follows:

- *To ensure development is consistent with the desired future landscape and built character of the area* – The site and its neighbouring properties is located within the St Ives Shopping Centre Low and Mid Rise Housing Are, which has been identified for increased residential density under the Housing SEPP. The development reflects this strategic direction by delivering a midrise form consistent with the future character of the area. High-quality landscaping and deep soil planting zones have been integrated into the design to soften the built form and ensure a sympathetic response to the surrounding environment.
- *To protect and improve the tree canopy within Ku-ring-gai* – The proposal significantly exceeds the tree canopy cover requirements under the Housing SEPP, providing meaningful contributions to local biodiversity and urban cooling, in keeping with the environmental values of the Ku-ring-gai LGA.
- *To provide viable deep soil landscaping within developments and between residential developments on neighbouring sites* – The development includes generous deep soil zones strategically located to support mature tree planting and promote ecological resilience. These spaces will allow for viable landscaping between buildings and neighbouring properties.
- *To minimise impervious surfaces that generate stormwater runoff* – The proposal reduces impervious area by retaining extensive landscape zones, permeable surfaces, and implementing stormwater management measures that align with Council and SEPP objectives.
- *To provide adequate spaces between buildings for common areas that support quality gardens around the building* – Building separation and siting allow for generous garden areas, communal open space, and landscaped buffers, contributing to residential amenity and a strong landscape setting.

Therefore while the proposal seeks a technical variation to the Ku-ring-gai DCP's site coverage control, it is fully compliant with the FSR, deep soil and tree canopy standards of the Housing SEPP, which prevails to the extent of any inconsistency

with local controls. More importantly, the development achieves the intent and objectives of Part 7A.5 of the DCP through its provision of high-quality landscaping, deep soil zones, and design outcomes that respect and reinforce the evolving character of the St Ives LMR precinct.

Separation

Separation between the buildings and adjoining buildings has been provided to ensure visual privacy is achieved. Importantly, the proposal provides the required building separation distances from the adjacent residential buildings to the north and south at 30-32 Cowan Road and 52 Cowan Road.

Within the site the proposal provides 12m separation between the proposed buildings up to the fourth storey. Above this, where an 18m building separation is recommended under the ADG between habitable dwellings, a reduced building separation distance is proposed ranging between 14.6 - 16m (see **Figure 24**) in order to concentrate the massing within the centre of the site and away from the more sensitive frontages, for example the more generous upper level setback has been proposed to Cowan Road. This reduced building separation has been tested to ensure that solar access is maintained, and privacy can be achieved through the orientation and location of windows and balconies.

This varied separation frames a view corridor through the development and onto Pymble Golf Course. Where ADG separation distances have not been achieved within the site, solid walls or privacy screens to habitable rooms are proposed to mitigate privacy impacts, windows have also been oriented to protect privacy.

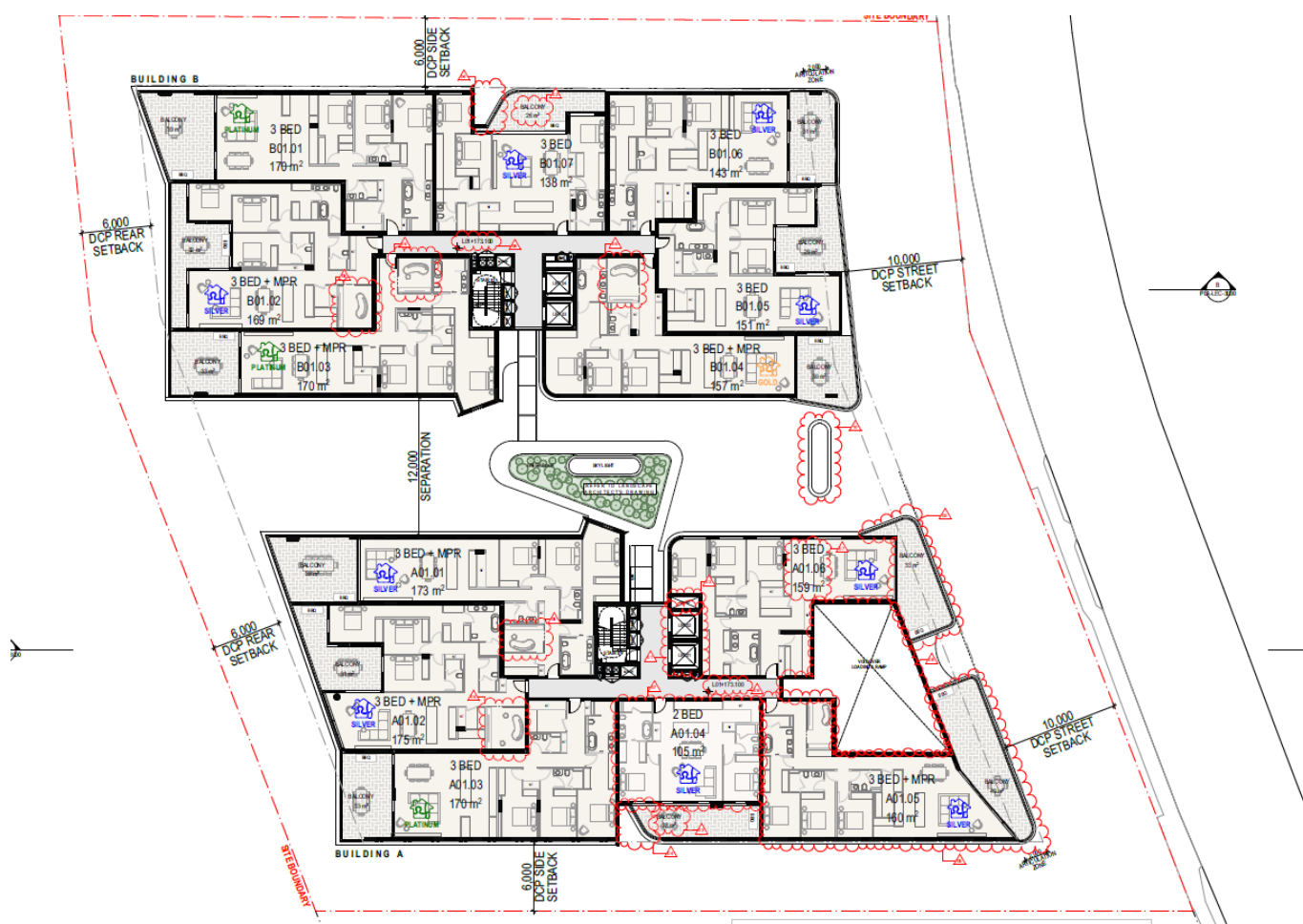


Figure 23 Building Separation and Setback Diagrams level 01

Source: Plus Studios

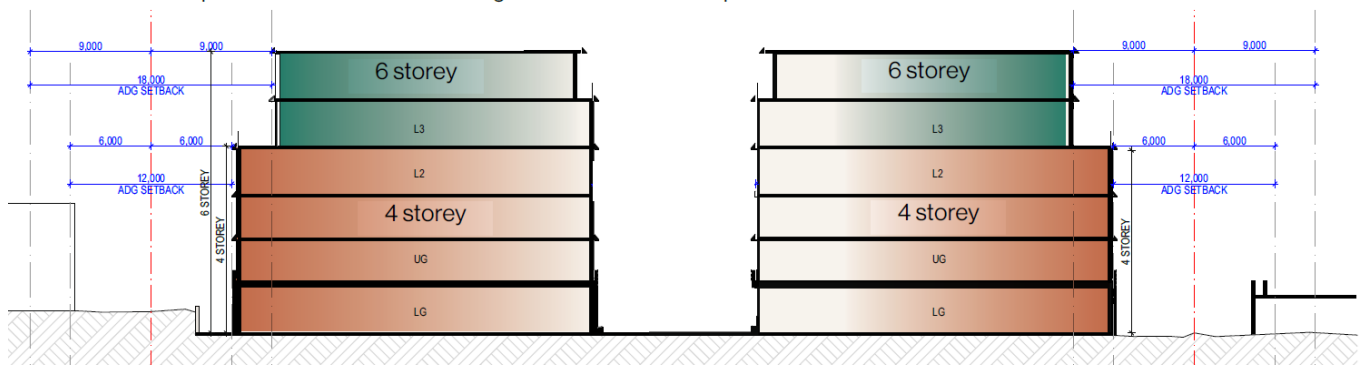


Figure 24 Setback Diagrams

Source: Plus Studios

Setbacks

The proposed development has been designed with consideration of the DCP setback requirements of the Ku-ring-gai DCP, as detailed in the table below.

Table 10 DCP Setback Compliance

Setback Requirements	Setback Proposed	Comment
Front setback		
10m from the street boundary	10m	Complies. The development has been setback 10m from Cowan Road. The design has been amended to ensure the ground floor terraces facing Cowan Road do not encroach beyond the 8m setback area.
Ground floor private terraces/courtyards may encroach into the setback areas provided there is a minimum setback to the terrace edge/courtyard wall of: i) 8m from the street boundary;	8m	Complies. The design has been amended to ensure that the ground floor terraces are setback 8m from the site boundary. 
Side setbacks		
a minimum of 6m from the side boundary for all levels up to the fourth storey	6m	Justified. The development largely achieves the minimum 6m setback to the side boundaries. Partial elements of the ground floor balconies extend into the side setback area, to provide visual interest and articulation of the façade. The building wall is setback at the higher storeys to enable greater setback distances to be achieved which comply with the 6m setback requirement.
a minimum of 9m to the fifth storey and above	9m	To the fifth storey and above, the development largely complies with the 9m setback requirements to the side boundaries. All habitable areas have been setback to the required 9m. At the third and fourth storeys there are elements of the balconies which extend into the side setback areas to provide articulation and visual interest to the façade. A minimum setback distance of 3-3.2m has been provided to the side boundaries. Importantly, the encroachment into the side setback areas does not inhibit the achievement of appropriate deep soil to promote tree planting and the retention of existing trees. This approach will assist in screening neighbouring developments and support the enhancement of the landscaped character of the area. Additionally, the articulation

Setback Requirements	Setback Proposed	Comment
		provided by the balconies contributes to the breaking up of the built form and massing, which reduces perceived bulk. In this way, despite the variation, the objectives of the DCP control are maintained.
Rear Setbacks		
a minimum of 6m from the side boundary for all levels up to the fourth storey and a minimum of 9m to the fifth storey and above	Part 6m part 9m	The balconies of the apartments at the rear of the site, minorly protrude into the 6m and 9m setback areas. Where intrusions into the setback zone occur, this has been balanced with areas that sit back further then the setback line. This ensures there is architectural articulation and variation within the built form and that the relevant objectives of the DCP control are achieved. The relevant objectives of the setback control include: • <i>To ensure buildings are situated within a garden setting dominated by tall trees.</i> • <i>To soften the built form and maintain the garden character of Ku-ring-gai.</i> • <i>To provide effective deep soil areas that are able to create a garden setting, including medium and tall trees, to all sides of the building.</i> • <i>To reduce the visual bulk of buildings from the street.</i> • <i>To ensure building setbacks at all levels respond to site conditions, and the local topography.</i> • <i>To ensure side and rear setbacks allow for deep soil landscaping including tall and medium trees that are able to screen blank facades and facades with openings to non-habitable rooms and service areas</i> • <i>To minimise bulk and scale impacts on neighbouring development.</i> • <i>To ensure setback areas limit elements that compromise deep soil planting and growth of tall trees.</i> • <i>To ensure that new development is of a scale that supports the desired area character with appropriate massing and spaces between buildings.</i> Unlike setbacks adjoining private lots, where amenity, privacy, and overshadowing are critical, the interface with the golf course differs in character and impact. In this context, a reduced setback does not compromise the amenity of adjoining land users and instead engages positively with the open space. This approach has been utilised at other properties along Cowan Road, including at 20 and 22 Cowan Road which both have a less than 6m setback to the Golf Course. The interface with the Golf Course will be screened with the planting of mature trees to further protect the development from any impacts from the use of the Golf Course. The area between the built form and the rear boundaries provides deep soil zones to support mature vegetation and will contribute to the maintenance of the garden setting and desired character of Ku-ring-gai. The minor encroachment into the setback zone does not impact on the perceived bulk and scale of the development as the area extending into the setback zone is constrained to the private terraces of the ground floor units. At level 6 the development achieves the required 9m setback to the rear boundary.

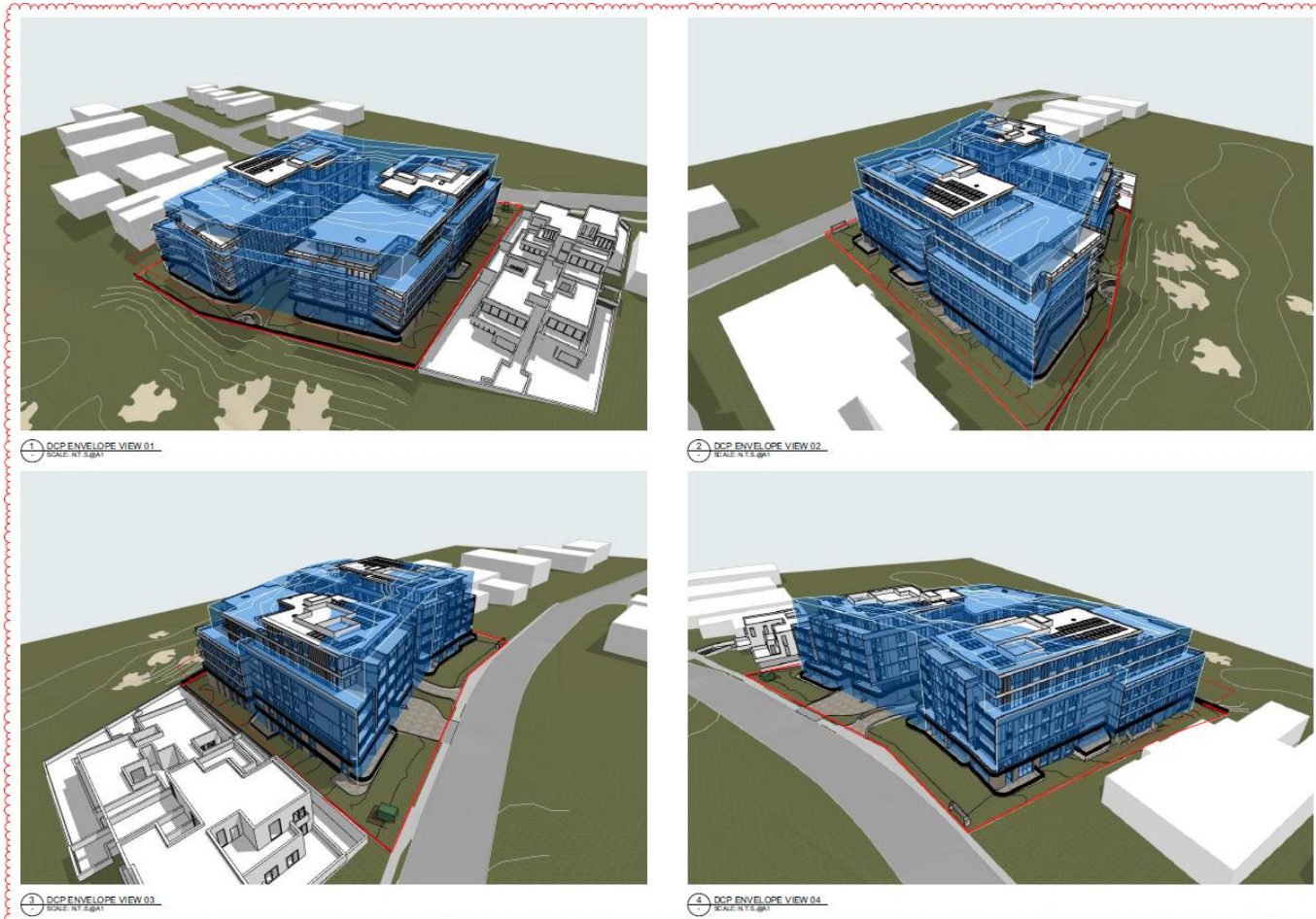


Figure 25 Building envelope diagrams

Source: Plus Studios

6.1.2 Landscaping and Tree Removal

The site benefits from a unique setting adjacent to Pymble Golf Course and opposite William Cowan Oval. In response, the landscape strategy has been carefully curated to provide both a visual and physical connection to these open spaces, enhancing the interface between the development and its natural context.

The proposed planting palette includes a mix of endemic and suitable exotic species, consistent with Ku-ring-gai Council's landscaping guidelines. Species such as Eucalypts, deciduous trees, and native rainforest varieties have been selected for their contribution to local character.

Importantly, the landscape design maximises deep soil zones by confining the basement footprint to beneath the main building envelope. This approach enables the establishment of mature canopy trees and ensures long-term tree health and viability.

The landscape layout is structured around a central “linear park”, offering a meandering, pedestrian-friendly pathway through curated garden spaces (refer to **Figure 26**). These areas contrast purposefully with the open expanses of the surrounding recreation areas and reinforce pedestrian connections from the public domain, improve wayfinding, and enhance the sense of arrival at the main building entry.

The landscape treatment has also been designed to soften the visual impact of the built form, enhance privacy for both future residents and neighbouring properties, and deliver a high-quality green interface to Cowan Road and the golf course edge.



KEY

1. Large canopy trees of Eucalyptus punctata.
2. Large dome shaped deciduous tree such as Acer buergerianum, as an entry statement within massed planting on grade.
3. Off street bicycle parking.
4. Mixed species smaller groupings of native and exotic trees to define leafy courtyard character, provide shade and privacy.
5. Trees planted within deep soil zone along street frontage to contribute to public domain greening (in lieu of space within the verge).
6. Seating wall with sinuous form to create a relaxed character to the garden.
7. Low sandstone wing walls at entry inspired by 20th century style walls in older houses along the street.
8. Deep massed planting to separate communal garden and Cowan Road from apartments.
9. Small trees in larger raised planters over basement.
10. Perimeter fence 900mm high maximum around private terraces.
11. Security fence and gate.
12. L1 shallow profile rooftop garden on pavilion.



KEY

1. Existing tree T25 retained.
2. New Jacaranda tree planted to supplement Jacaranda planted at street entry.
3. Circular stepped terrace with large shade tree over such as indigenous cheese tree.
4. Mixed species smaller groupings of native and exotic trees to define leafy courtyard character, provide shade and privacy.
5. Trees planted within deep soil zone in front of and behind low seating wall.
6. Seating wall with sinuous form to create a relaxed character to the garden.
7. Generous massed planting areas within deep soil zones.
8. Turfed access over deep soil within open space.
9. Deep massed planting to separate communal garden from apartments.
10. Small trees in larger raised planters over basement.
11. Perimeter fence 900mm high maximum.
12. Planters at western edge of private terrace.
13. Existing mixed trees within golf course.

Figure 26 Landscape Detail Plans

Source: Loci Design Collective

Tree Removal and Planting

An Arboricultural Impact Assessment and Tree Protection Plan has been prepared by Vertical Tree Management and Consultancy and is appended to this SEE. The AIA evaluates the potential impacts on trees and makes recommendations to reduce the impacts on the trees proposed for retention.

A total of seventeen (17) trees have been assessed in relation to the proposed development, comprising thirteen (13) trees located within the subject site and four (4) trees situated on neighbouring properties in close proximity to site boundaries.

Following a detailed assessment of each tree's health, structural condition, species significance and proximity to the proposed works it was recommended that:

- 1 tree is recommended for removal due to its location within the proposed building footprint that precludes viable retention.
- 16 trees are recommended for retention, including those located both on-site and on neighbouring properties, where appropriate protection and management can be implemented.

These trees will be supported by significant deep soil zones (29.6%), which exceed the required zones under the *Tree Canopy Guide for Low and Mid Rise Housing*. 34 large trees are proposed to reside within these deep soil areas. These large trees will be adequacy spaces to preserve key views and to complement the architectural expression of facades and entry points.



Figure 27 Canopy Coverage and Tree Replacement

6.1.3 Residential and Environmental Amenity

The development comprises 76 apartments, which have been designed to a high standard to maximise residential amenity. This is demonstrated within the Design Verification Statement prepared by Plus Architecture (**Appendix D**), which provides an assessment of the proposed development against each of the design principles under Schedule 9 of the Housing SEPP. A detailed ADG assessment has also been undertaken by Plus Architects within **Appendix D**, which confirms that the proposed development is consistent with the objectives of the ADG and achieves numeric compliance with the ADG standards. A summary of the proposed development's consistency with these standards is provided below.

Apartment Mix and Size

A total of 76 dwellings is proposed across the two buildings. A mix of 2-bedroom, 3-bedroom and 4-bedroom units are proposed, however the majority of the dwellings are proposed to be 3-bedroom units which suits the demographic of the area which largely comprises of families. Each of the apartments meet the size requirements of the ADG as outlined below.

Table 11 Apartment size ADG compliance

Apartment Type	Minimum internal area	Proposed internal area
2 bedroom	70m ²	70m ²
3 bedroom	90m ²	90m ²
4 bedroom	102m ²	102m ²

The proposal also includes the provision of high quality private open spaces within every apartment and access to landscaped communal open spaces the site.

There are a mix of LHA Silver, Gold, and Platinum units, providing housing diversity and opportunities to age in place

- 75% of units achieve the Livable Housing Guideline's Silver Level universal design features.
- 9% of units achieve the Livable Housing Guideline's Gold Level universal design features.
- 16% of units achieve the Livable Housing Guideline's Platinum Level universal design features. This aligns with the 15% requirement as per DCP.

Solar Access and Natural Ventilation

Detailed solar access and cross ventilation studies have been undertaken by Plus Architecture to support the proposal. The assessments confirm that:

- 71% of apartments achieve at least 2 hours of solar access, exceeding the minimum 70% ADG design criteria. 12% of the unit receive no solar access, complying with the maximum 15% requirement.

- 63% of the units are naturally ventilated, exceeding the 60% target provided under the ADG.



Figure 28 Percentage of Cross-Ventilated Apartments

Source: Plus Studios



Figure 29 Solar access

Source: Plus Studios

Solar Access to Neighbouring Residences

The proposed development has been carefully designed to respect the amenity of neighbouring residential properties and to preserve the function and environmental quality of the Pymble Golf Course. Reductions on the proposed height of the building further improve the solar access outcomes for neighbouring residents.

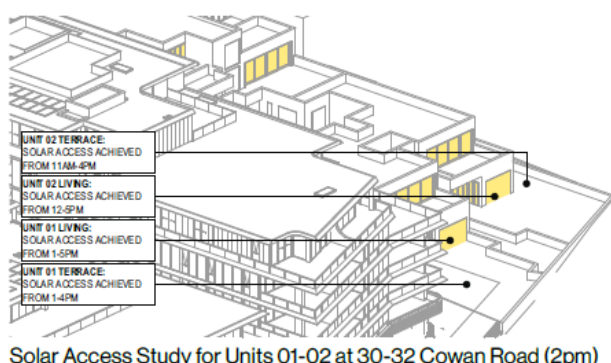
A detailed solar and overshadowing assessment was undertaken by Plus Architecture, confirming that the development maintains compliant solar access to neighbouring properties and results in minimal overshadowing impacts on the golf course. To mitigate overshadowing and maintain privacy, the development incorporates compliant setbacks as follows:

- Building B (Northern Building) includes a 6-metre northern setback to the first four storeys, increasing to 9 metres for levels 5 and 6.
- Building A (Southern Building) includes a 6-metre southern setback to the first four storeys, increasing to 9 metres for levels 5 and 6.

These setbacks effectively reduce the extent and duration of overshadowing to the adjacent dwellings and open space areas, particularly during the critical winter period.

Shadow modelling was undertaken to evaluate solar access impacts to the living rooms, primary private open spaces and any communal open spaces (referred to as units) at the apartment building at 30–32 Cowan Road. The apartment building contains 7 dwellings. The modelling confirmed that six out of seven units (86%) achieve 3-hour solar access to living areas during the winter solstice and balcony/ terraces during the winter solstice, thereby exceeding the minimum 70% units achieving 3 hour solar access required by the Ku-ring-gai DCP and exceeding the minimum 2 hours solar access of direct solar access to their primary living areas and private open spaces between 9am and 3pm on the Winter Solstice (21 June) required by the ADG s shown in **Figure 29**.

The development is therefore consistent with both the Ku-ring-gai DCP and the Apartment Design Guide (ADG) requirement that a minimum of 70% of dwellings within an adjoining development should achieve this solar access benchmarks.



The resulting solar access figures are as below:

SOLAR ANALYSIS TO 30-32 COWAN ROAD (PROPOSED)

	SOLAR ACCESS TO LIVING	SOLAR ACCESS TO BALC / TERRACE
UNIT 01	2H ACHIEVED	2H ACHIEVED
UNIT 02	2H ACHIEVED	2H ACHIEVED
UNIT 03	2H ACHIEVED	2H ACHIEVED
UNIT 04	2H ACHIEVED	2H ACHIEVED
UNIT 05	0H ACHIEVED	2H ACHIEVED
UNIT 06	2H ACHIEVED	2H ACHIEVED
UNIT 07	2H ACHIEVED	2H ACHIEVED

6/7 UNITS (86%)
ACHIEVE 2H SOLAR
ACCESS TO LIVING
AREAS DURING
WINTER SOLSTICE
(9AM-3PM)

7/7 UNITS (100%)
ACHIEVE 2H SOLAR
ACCESS TO OUTDOOR
SPACES DURING WINTER
SOLSTICE
(9AM-3PM)

SOLAR ANALYSIS TO 30-32 COWAN ROAD (PROPOSED)

	SOLAR ACCESS TO LIVING	SOLAR ACCESS TO BALC / TERRACE
UNIT 01	3H ACHIEVED	3H ACHIEVED
UNIT 02	3H ACHIEVED	3H ACHIEVED
UNIT 03	3H ACHIEVED	2H ACHIEVED
UNIT 04	3H ACHIEVED	3H ACHIEVED
UNIT 05	1H ACHIEVED	3H ACHIEVED
UNIT 06	3H ACHIEVED	3H ACHIEVED
UNIT 07	3H ACHIEVED	3H ACHIEVED

6/7 UNITS (86%)
ACHIEVE 3H SOLAR
ACCESS TO LIVING
AREAS DURING
WINTER SOLSTICE
(7AM-5PM)

6/7 UNITS (86%)
ACHIEVE 3H SOLAR
ACCESS TO OUTDOOR
SPACES DURING WINTER
SOLSTICE
(7AM-5PM)

Figure 30 Extract of Solar Access Modelling to 30-32 Cowan Road

Overall, the proposal delivers a well-considered built form outcome that balances site optimisation with the protection of surrounding amenity, in accordance with the objectives of the Housing SEPP and the ADG.

Communal Open Space

The proposal includes the delivery of 1,510m² of Communal Open Space on the ground floor, which equates to 26% of the site area. The provision of COS is in accordance with the ADG requirement of 25% of the site area (refer to **Figure 31**).

Solar access diagrams for the principal communal open space have been prepared and are included at **Appendix B**. These diagrams demonstrate that 31% of the principal communal open space receives a minimum of 2 hours of direct solar access between 9am and 3pm at the winter solstice, which is below the ADG benchmark requiring 50% of the principal usable part of the communal open space to receive this level of sunlight. Notwithstanding this, the principal communal open space is centrally located within the site adjacent to the golf course, where it benefits from a high level of privacy and amenity. This location is considered the most suitable for communal open space, although solar access is constrained by the east-west orientation of the site and the orderly siting of buildings. When the entire communal open space area is considered, including the principal usable area, 58% achieves at least 2 hours of solar access.

While the proposal does not fully satisfy the ADG solar access benchmark for the principal usable communal open space, the ADG recognises that this may be offset by other design measures that maintain a high level of residential amenity. In this regard, the development provides substantial private open space well in excess of ADG minimum requirements, including balconies ranging from 15m² to 28m² for 2-bedroom apartments, 19m² to 71m² for 3-bedroom apartments, and 72m² to 102m² for 4-bedroom apartments. Ground floor apartments also provide private open space exceeding the 15m² minimum requirement. In addition, 70% of apartments achieve at least 2 hours of solar access to primary living areas and private open space between 9am and 3pm at the winter solstice, consistent with the ADG. These private open spaces also benefit from high-quality outlooks towards the golf course and William Cowan Oval.

The communal open space is further enhanced by its integration with deep soil zones, allowing for canopy planting and a strong landscape character. The site also benefits from close proximity to substantial public open space and recreation facilities, including St Ives Village Green to the east, which provides playing fields, tennis courts, a playground and skate park. Accordingly, although the proposal does not fully achieve the numerical solar access benchmark for the principal usable communal open space, it is considered to satisfy the broader objective of the ADG by providing an adequate area of communal open space to enhance residential amenity and landscaping opportunities, meeting the minimum communal open space area requirement of 25% of the site area, delivering high-quality landscaped communal open space, providing generous and well-sunned private open space, and benefiting from convenient access to nearby public recreation facilities.

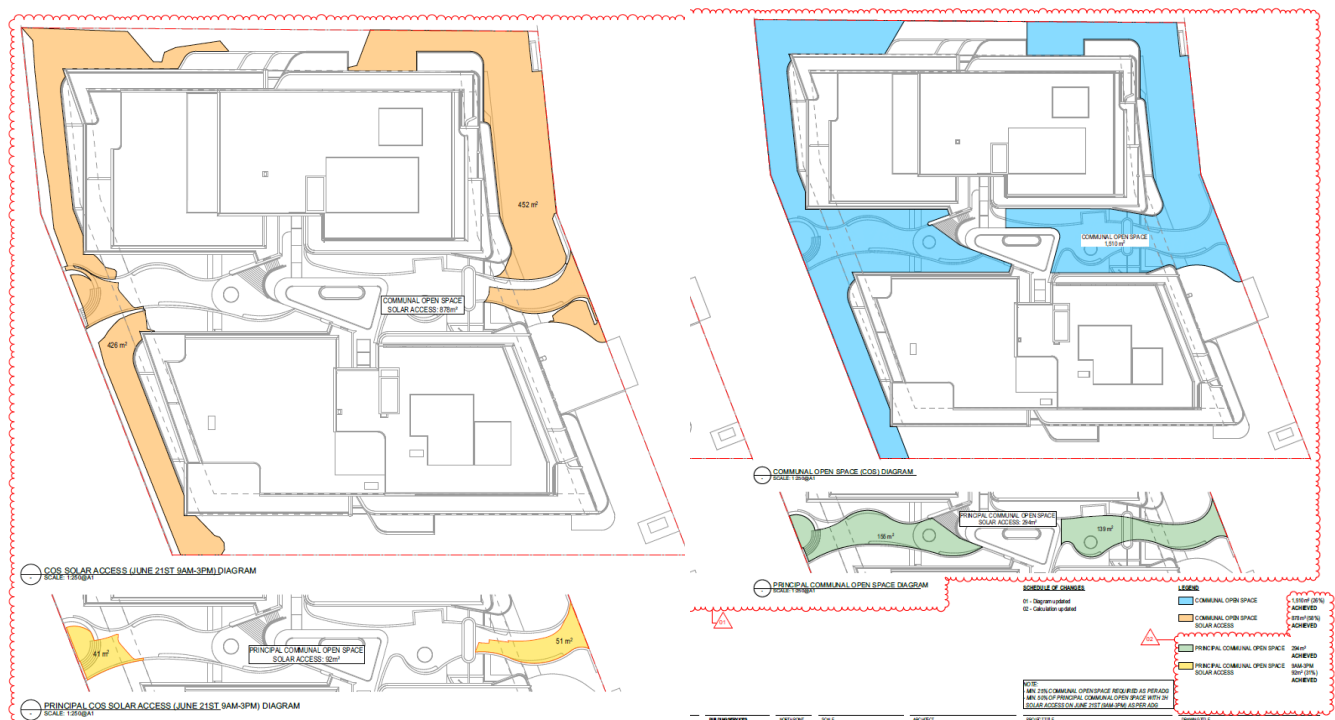


Figure 31 Communal Open Space and Solar Access

Overshadowing to the Golf Course

An overshadowing analysis was undertaken by Plus Architecture to assess the potential impacts on the adjacent golf course. The findings indicate that the fairway experiences additional overshadowing at 9:00am during midwinter. However, by approximately 10:00am, the shadows largely recede from the fairway. Any overshadowing that persists beyond 10:00am primarily affects the bunkers and vegetated areas. As a result, the proposal is not anticipated to have any adverse impact on the health of the fairway grass or player amenity which receive uninterrupted solar access for the remainder of the day. The overshadowing analysis is extracted in **Figure 32**.

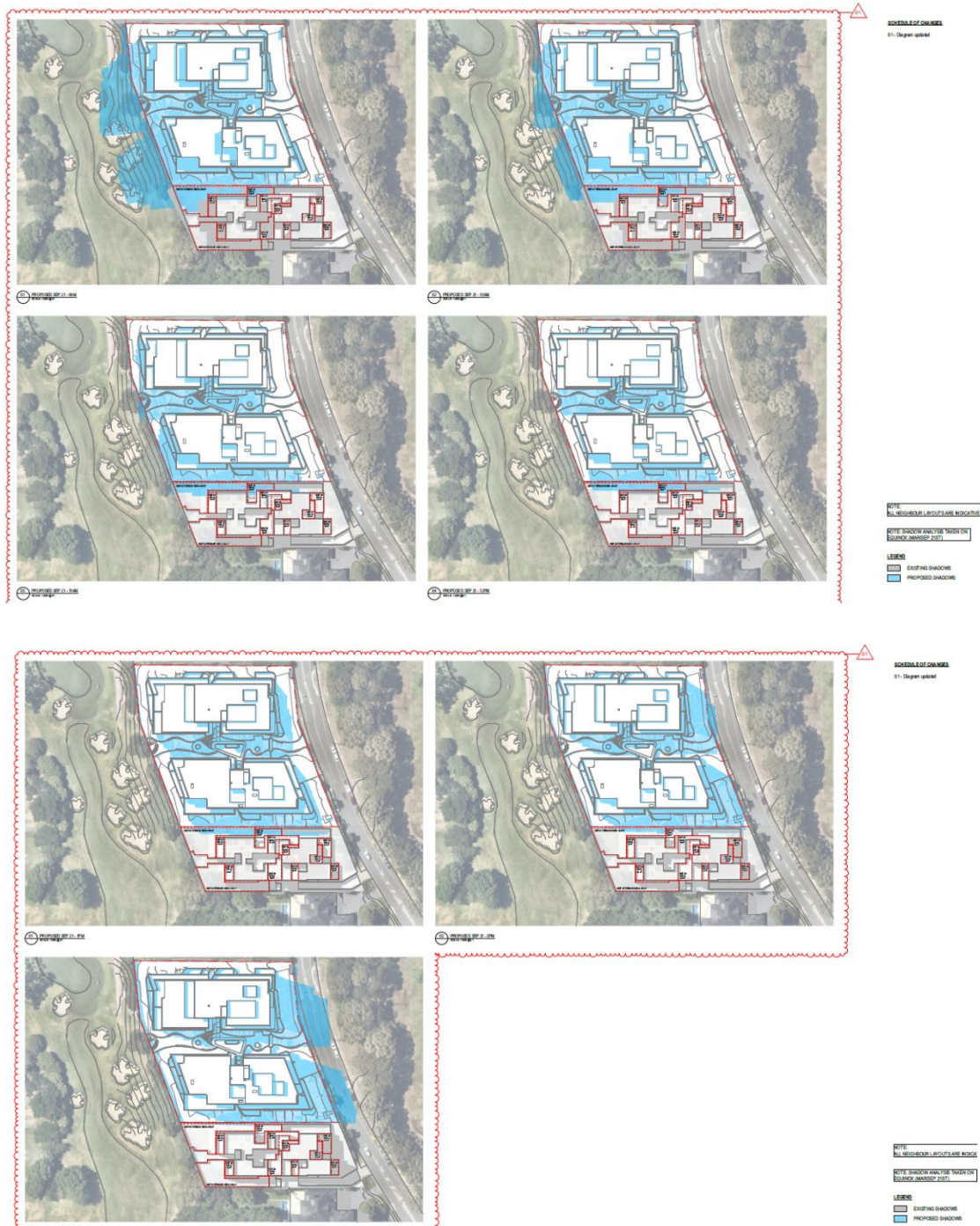


Figure 32 Shadow Diagrams

Privacy and safety

The design of the course, seeks to mitigate the risk of stray golf balls hitting the buildings fronting Cowan Road through the strategic placement of several sand bunkers along the eastern edge of the green, as illustrated in **Figure 33**.



Figure 33 Aerial image depicting golf course bunker location

Design features have been incorporated into the proposal to minimise the risk of trespassing onto the adjoining private golf course. The development will be separated from the Golf Course by a low-scale fence, which will act as a physical barrier. No direct access from the development to the Golf Course is proposed.

Due to the natural slope of the site, the proposed lower-ground communal open space will be positioned above the level of the Pymble Golf Course. This level change will enhance privacy and provide a degree of protection for users of the communal space from activities on the Golf Course. Existing and proposed trees will further screen the development, protecting residents and buildings from stray golf balls.

It is noted that the proposal is located adjacent to a section of the Golf Course containing several sand bunkers. These features are likely to discourage players from hitting balls in the direction of the development and provide an additional layer of protection. Please refer to **Figure 34-Figure 35** below for details.



Figure 34 Landscape section Pymble Golf Course interface (as originally lodged)

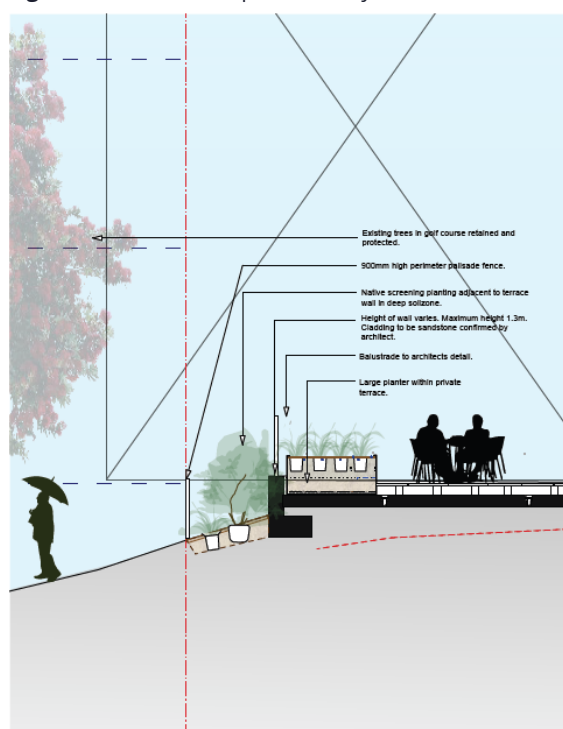


Figure 35 Detailed section - Pymble Golf Course interface (as originally lodged)

To mitigate privacy impacts to adjoining neighbours resulting from overlooking, the treatment of balconies and windows with privacy screening will continue to be investigated. Additionally, landscaping is proposed along the northern and southern site boundaries to further protect the privacy of adjoining residents.

6.1.4 Façade and Materiality

The façade concept has been carefully designed to reflect the natural history of the site, as well as celebrate the site unique interface with the golf course and William Cowan Oval. The concept is centred around the Blue Gum high forest which was once prevalent in the suburb and is manifested in the building design through the inclusion of vertical sculptural brick pillars which evokes the shapes of tree trunks and a masonry base which grounds the podium into the landscape.

Additionally, the materials chosen to reflect the concept of layering influenced by the unique character of blue gum bark.

The northern elevation of Building B and the southern elevation of Building A have been amended to include an architectural notch in the facade on the typical floorplates, to break up the length of the façade.



Figure 36 Photomontage of the development when viewed from Cowan Road (as originally lodged)



Figure 37 Photomontage of the development when viewed from the Golf Course (s originally lodged)

6.2 Traffic, Parking and Access

Ason Group were engaged to prepare a Transport Assessment which forms part of the DA submission. The report has identified the traffic implications associated with the development and the required parking and access arrangements.

Vehicular Access

The proposed development includes removal of all three existing vehicle crossovers and construction of a new crossover on Cowan Road in the centre of the site. The access point will accommodate two-way movements in and out of the basement car park (refer **Figure 38**). A loading dock is located on the upper ground level, with all visitor parking on the

lower ground level and resident parking across the basement levels.



Figure 38 Upper ground floor plan demonstrating proposed vehicular access arrangements

Source: Plus Studios

The amended proposal will not result in any loss to on-street parking spaces on Cowan Road.. The proposal has also provided on-site visitor car parking to reduce the dependency on on-street parking. No change is proposed to the existing no parking and no stopping restrictions along the balance of the site frontage along Cowan Road.

To minimise queuing along Cowan Road, the entrance driveway has been designed to provide queuing space for 2 cars, situated wholly within the development boundary. Modelling has been undertaken to confirm that a queue of no more than one vehicle is expected, therefore ensuring that queuing will not adversely impact traffic movements along Cowan Road.

Parking Provision

Car parking is provided across three basement levels. The Ku-ring-gai DCP requires the provision of a minimum of 166 spaces, as outlined below.

Table 12 Required and Proposed Parking Provision

Unit Type	Yield	Minimum parking rate	Minimum parking requirement	Car parking proposed
2-bedroom	5	1.25 spaces per dwelling	7	157
3-bedroom+	70	2 spaces per dwelling	140	
Visitor	-	0.25 spaces per dwelling	19	19
Total			166	178

The proposed development is to provide a total of 178 car parking spaces, which meets the minimum requirements of the DCP, with all resident spaces proposed to be EV ready. The parking provision comprises:

- 19 x visitor spaces on the lower ground floor
- 157 x residential spaces within basement level 1 and 2
- 1 x car share space
- 1 x car wash bay

The generous provision of car parking will ensure that the development does not place additional strain on on-street parking in the area which is often limited.

The DCP requires bicycle parking to be provided at a rate of one bicycle space per dwelling (in the form of an individual locker or secure room) and one space per 10 apartments for visitors (in the form of a bicycle parking device or rack). Therefore, the proposed development is required to provide 84 bicycle spaces (75 for residents and eight for visitors).

The proposal includes 76 bicycle spaces for residents in secure bike storage rooms in the car park on lower ground, basement 1 and basement 2. Eight visitor spaces are also provided in the central courtyard on upper ground. Each apartment is also provided with storage cages in the basement car park with dimensions suitable for accommodating a bicycle. When including this as practical bicycle storage, there are at least 76 additional bicycle spaces available for use by residents and a minimum overall total of 152 resident spaces across the development. This exceeds the DCP 2024 requirement of 84 bicycle spaces (76 resident and eight visitor) and is appropriate.

Active Transport Access

Due to the level change across the site, a designated access route has been provided for active transport users to ensure ease of movement across the site. Resident cyclists will enter the development via the pedestrian entry point and use the lift to travel between the lower and upper ground levels to access the bike storage area on the lower ground floor. The lift size has been chosen to accommodate bicycles.

Loading

All loading and waste collection is proposed within the single loading dock on the upper ground floor with direct access via the main driveway. The loading dock has been designed to accommodate vehicles up to and including Council's 6.7-metre-long rear load waste collection vehicle and a range of delivery and removalist trucks (up to the Australian Standard 6.4 metre small rigid vehicle).

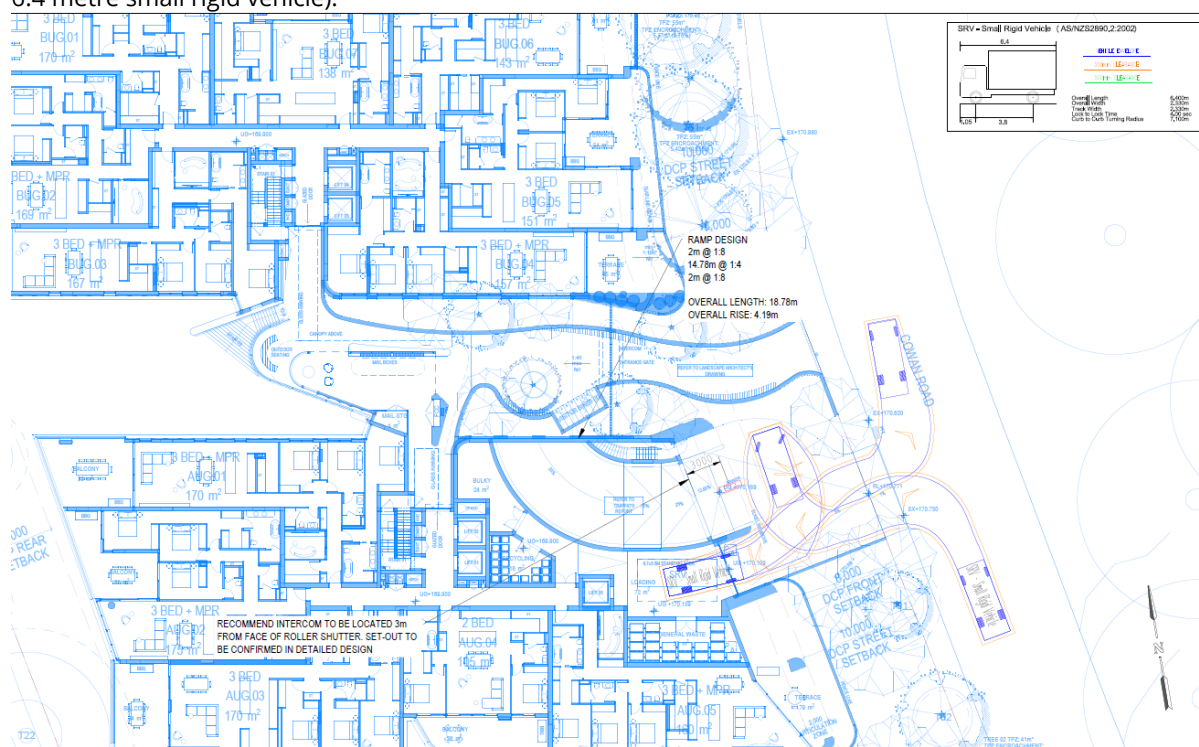


Figure 39 Swept path diagram

Source: Ason Group

Traffic Generation and Impact

The traffic generation for the proposal has been estimated using the traffic generation rates outlined in TfNSW Guide to Transport Impact Assessment 2024 (GTIA). As the site is currently vacant, all generated traffic will represent a net increase to the local network however consideration must also be given to the existing approval on the site for 24 residential townhouses.

Under that approval (DA0270/22), the development was estimated to generate approximately 16 vehicle trips during both the AM and PM peak hours. In comparison, the current proposal for a 76-dwelling residential flat building is expected to generate up to 36 vehicle trips during the AM and PM peak hours. While this represents an increase in traffic generation, it reflects the higher dwelling yield and density of the current proposal in line with NSW Government objectives to diversify housing options, increase density sensitively, and deliver more homes.

The increase of 20 vehicle trips is considered minor, equating to an additional vehicle trip every three minutes compared to that previously assessed.

The volumes of existing collector and arterial road volumes near the site have been sourced from the Pymble Golf Club Planning Proposal, Transport Impact Assessment. The report referenced a 2017 base year, and a 2027 future baseline year. The following 2027 vehicle volumes were forecast in the report during the AM and PM peak hours:

- Killeaton Street: 1,000 – 1,200 vehicles per hour
- Mona Vale Road: 2,100 – 2,200 vehicles per hour.

Considering the 36 vehicle trips expected to be generated by the proposed development and the associated traffic distribution, the proposed development is expected to result in midblock traffic volume increases of up to one per cent on both Killeaton Street and Mona Vale Road, the nearest collector and arterial roads. This is well within typical daily fluctuations of traffic volumes along these roads and demonstrates the proposed development would not have a noticeable impact on the operation or performance of the surrounding road network.

Given the low traffic volumes, no material impact on the operation or performance of nearby intersections is anticipated, particularly given the site's proximity to key road corridors and the presence of traffic calming measures already in place along Cowan Road.

This development has minimal impact on the intersection. Any agreement for Traders to signalise the intersection would be subject to Council agreement and diversion of developer contributions to this infrastructure.

6.3 Ground and Water Conditions

A Geotechnical Assessment was prepared by JK Geotechnics. JK Geotechnics previously carried out a geotechnical investigation (Ref: 34506YJrptRev4, dated 4 April 2023) at the site for DA0270/22. As such, the results of the previous investigation have been utilised in part, to inform the recommendations, however, future geotechnical investigations will be required to be undertaken prior to the commencement of works, at the detailed design stage.

Fieldwork was carried out in December 2021 and October 2022 and comprised the drilling of boreholes, installation of groundwater monitoring wells and the drilling of hand augured boreholes. These investigations were supplemented by a site walkover assessment comprising an inspection of the site and its surrounds on 24 June 2025, with changes to the site observed and documented. The intention of the assessment was to determine whether the proposal will adversely impact upon the environmental functions and processes or neighbouring uses. The investigations found the following:

Geotechnical

Of the boreholes that were drilled for the prior DA only one, BH101 extended below the depth of the proposed bulk excavation level of RL160m. As such, additional cored boreholes must be drilled over the basement footprint to at least 3m below the proposed bulk excavation level of RL160m for detailed design. The investigation found that the site is overlain by fill, silty clay and siltstone. Siltstone of very low to low strength is anticipated to be encountered at the base of the excavation and is suitable to support the expected loads of pad and strip footings.

JK Geotechnics recommend that prior to the commencement of any site works that detailed dilapidation reports be completed on the adjoining buildings/structures (including pavements) to the south, east and north, which includes the buildings at Nos. 30-32 and 52 Cowan Road and the footpath and Cowan Road. This is to ensure that no adverse impacts to surrounding development occur as a result of the development.

Excavation

Excavation to a depth of 10m will be required. Given the depth of the proposed bulk excavation level and set back distances, JK Geotechnics recommends that the basement be uniformly supported by the installation of a retention system prior to the commencement of excavation, to protect adjoining properties.

Groundwater

Groundwater appears to be flowing across the site from the east to the west. The long-term groundwater monitoring undertaken within BH101 to BH103 show the groundwater to be located wholly within the siltstone bedrock. Based on the maximum recorded groundwater levels, groundwater is to be encountered at between about 2.5m and 7m above the proposed bulk excavation level at the lower basement level. Groundwater seepage into the bulk excavation is therefore expected to occur, particularly following periods of inclement weather.

JK Geotechnics have identified that a drained/ tanked basement is to be pursued on the site, with approval sought from WaterNSW to allow ongoing dewatering. Further groundwater monitoring is proposed to be completed within 6 months of the submission of this application to confirm the groundwater flow rates. Subject to the findings of the modelling, a dewatering management plan will be prepared. We welcome the inclusion of a condition of consent to ensure this will occur.

6.4 Contamination

A Preliminary Site Investigation (PSI) was undertaken by Environmental Group Australia (EGA Group) to support the development. The PSI confirms that the site has been previously remediated under DA0270/22 in accordance with the below contamination assessments and is suitable for development:

- *Environmental Group Australia Pty Ltd (EGA 2025a), 'Remedial Action Plan – 46-50 Cowan Road, St Ives NSW', dated 22 April 2025, Ref: 3026-RAP-01-220425.v1f;*
- *Environmental Group Australia Pty Ltd (EGA 2025b), 'Asbestos Materials Clearance Inspection Report', dated 19 May 2025, Ref: 3025-ASBCLR-01-190525.v1f; and*
- *Environmental Group Australia Pty Ltd (EGA 2025c), 'Asbestos Materials Clearance Inspection Report', dated 6 June 2025, Ref: 3026-ASBCLR-02-060625.v1f.*

These prior contamination assessments had identified suspected asbestos fibre cement fragments within the north-west of site following demolition works. A site walkover was completed by EGA on the 19 March 2025 which confirmed the location of the contaminated material.

Impacted soil materials were excavated from the subject site in May 2025. Spoil was temporarily stockpiled on site, subject to waste classification and disposed of offsite to a licensed waste receiving facility. Removal works were undertaken by EnviroManage Systems Pty Ltd, a SafeWork NSW Class A licensed asbestos removalist.

Upon completion of the works, the supervising occupational hygienist inspected the footprint and surrounding areas for residual asbestos containing materials. No asbestos containing materials were observed on the residual soil surface within the subject area at the time of the inspection. These findings were recorded in the Asbestos Material Clearance Inspection Reports dated May and June 2025.

EGA undertook a further site walk on the 20 May 2025 following the remediation works and did not encounter any areas of concern. Based on the information contained in the previous assessments, EGA are of the opinion that the site has been appropriately remediated and is suitable for the proposed development. Should any potential contamination be identified within the site during works, works should cease, and an Unexpected Finds Protocol will be followed.

6.5 Noise and Vibration

An Acoustic Assessment has been prepared by Acoustic Logic and is appended to this application. The Acoustic Report has been undertaken in accordance with the relevant standards and policies. The assessment has considered the potential noise impacts from surrounding noise sources to the proposed residential development as well as considered the potential noise impacts from the development to surrounding sensitive receivers.

The assessment has identified that the existing noise environment was characterised by traffic noise from Cowan Road. The nearest residential receivers to the site are identified at being properties to the north, northeast and south of the development as illustrated in **Figure 40**. The site is also adjacent to the Pymble Golf Club which is identified in the report as an active recreation land use and William Cowan to the east of the site which is also an active recreation area.



Figure 40 Nearby sensitive receivers

External Noise Intrusion

The main source of external noise intrusion to the proposed development was identified to be nearby transportation noise from Cowan Road. To mitigate external noise intrusion to the proposed development it is recommended that construction/ design elements are implemented, including window glazing and external wall upgrading as required. Subject to the implementation of these design features, the proposal will satisfy the relevant requirements to mitigate external noise impacts.

Noise Emissions

The potential sources of noise emission from the development have been identified as noise from mechanical plant and noise from the use of outdoor communal spaces.

Whilst the mechanical plant selection and location have not been confirmed at this stage, Acoustic Logic expect that satisfactory levels of noise emission are achievable through appropriate plant selection, location and the implementation of standard acoustic treatments. Importantly, the driveway and access to development have been relocated from the southern boundary to a more central location which will directly alleviate the concerns of the neighbouring residents at 30 – 32 Cowan Road.

The noise generated by the operation of communal areas is neighbourhood noise and no documented acoustic legislation can be applied. Notwithstanding the above, to minimise any potential noise impacts to surrounding occupants, the following recommendations are provided:

- Building management is to ensure the outdoor common areas are not to be used for parties, such that normal vocal levels would be expected as opposed to raised voices.
- Use of the common areas is to be limited to 7:00am to 10:00pm and no use from 10:00pm to 7:00am

Based on the acoustic assessment of impacts associated with the development no adverse noise impacts are expected to occur. A detailed assessment of mechanical plant and equipment is to be undertaken during CC phase to ensure that noise emissions comply with the established criteria.

6.6 Stormwater

A Stormwater Report has been prepared by BG&E to assess the stormwater management requirements for the site and is appended to the SEE. The stormwater report outlines the proposed integrated stormwater management and water sensitive urban design concept which has been prepared to comply with the requirements of the Ku-ring-gai DCP. Civil drawings comprising, stormwater drainage plans and an erosion and sediment controls plan have also been prepared by BG&E and are submitted with the Stormwater Report.

The site is identified as being within the Cowan Creek Catchment Area and is not flood affected. The site does not contain any drainage infrastructure however there is a drainage easement present along the western boundary.

Under the development it is proposed to provide drainage infrastructure that will drain to the existing drainage easement along the western boundary of the site. The drainage infrastructure has been designed to comply with the Permitted Site Discharge (PSD) and Site Storage Requirements (SSR) for the Cowan Creek Catchment, as depicted in the **Figure 40** below.

Code	Catchment Area	Permitted Site Discharge (l/s/ha)	Equivalent Minimum OSD Storage Volume (m ³ /ha)
AC1	Avondale Creek	102	398
AC2	Avondale Creek	166	241
BB1	Blackbutt Creek	141	302
BB2	Blackbutt Creek	166	241
BC1	Cowan Creek	96	414
BC2	Cowan Creek	166	241
BG1	Blue Gum Creek	147	287
BG2	Blue Gum Creek	166	241

Figure 41 PSD and SSR requirements for Cowan Creek Catchment

Source: BG&E Stormwater Report

Water Sensitive Urban Design (WSUD) measures, including an on-site detention tank and a rainwater tank have been integrated into the design in order to protect water quality.

An on-site detention tank is required for the development and will be provided in the basement along the western side of the site. The site is proposed for development with OSD tanks to restrict flow from the site. The tanks have been designed to allow for 1,050 m³ to bypass the tank, in line with council requirements. The OSD tanks must have a volume of 146.65 m³ and a PSD rate of 25.5 l/s. The proposed OSD tank has a volume of 150m³, and a PSD rate of 25 L/s, therefore complying with the requirements

Water quality modelling was used to assess the adequacy of the proposed stormwater treatment measures and ensure that stormwater discharge meets quality objectives prior to leaving the site. Water treatment is required to meet Council's pollutant reduction targets and to protect the quality of surrounding properties, waterways and groundwater systems. This has been achieved through the use of proprietary stormwater treatment products. The following products are required to meet council objectives:

- 10 kL rainwater tank
- 11 x Oceanguard (or equivalent)
- 9 x Psorb 690mm (or equivalent)
-

Subject to the implementation of these WSUD features the high stormwater quality will be achieved, including:

- 100% reduction to Gross Pollutants
- 85.6% reduction to total suspended solids
- 86.2% reduction to total phosphorus
- 68.8% reduction to total nitrogen

The integration of the stormwater management system into the proposed development, along with the incorporation of WSUD, will ensure that adverse impacts are avoided and the development positively contributes to water quality, stormwater retention and detention, the protection of public spaces and the amenity of the area.

6.7 Waste Management

An integrated Demolition, Construction and Operational Waste Management Plan has been prepared by Colliers and is appended to this EIS at **Appendix O**. The WMP includes processes for the handling of waste throughout all phases of the development.

Demolition and Construction Waste Management

The Demolition and Construction Waste Management Plan details the volumes of the different waste materials anticipated to be generated during demolition and construction stage. The Waste Management Plan also details how the various waste streams will be recycled or disposed of off-site. As the site has been previously cleared, demolition waste will not be required.

Every effort will be made to ensure as much construction waste as possible is recycled. The construction methodologies identified within the WMP will ensure waste is minimised and appropriately disposed of/ recycled.

Operational Waste Management

The OWMP identifies all potential waste generation during the operational stage and details how waste is to be handled, processed and disposed of, reused or recycled. The OWMP has been prepared in accordance with the waste requirements within the Ku-ring-gai Council DCP.

Waste generation estimates have been calculated in accordance with the residential development rates within the Ku-ring-gai Council DCP. Residential waste is to be separated by residents into the following separate streams: General waste, combined recycling and paper and cardboard. Residents will be responsible for sorting their waste into the appropriate streams: garbage (general waste), commingled recycling, food organics and garden organics, bulky waste and hazardous/ electronic waste. The garbage and recycling are to be collected once per week.

- Residential waste: Residents will have receptacles within their individual units for collection and storage of at least one day of general waste and recycling. Waste bins should be accompanied by a recycling bin (commingled recycling or bins for plastics, glass etc.) and cardboard/ paper Bins in order to facilitate separation of general waste and recycling. Waste bins should always be lined with bags and the bags tied before removal. Once full, residents will transfer / carry their waste to the waste and recycling dual chutes provided on every level or the (bulk) bins in the bin room for bulky waste and cardboard/ paper. General waste should weigh approximately 3 kg or less
- Organic food waste: Separating organic or food waste from general waste may be considered to reduce the total amount of general waste produced. Each apartment will be provided with organics kitchen caddies to transport their food organics waste from the kitchens to the organics bins in the basement.
- Bulky Waste: A bulky waste area of 21sqm has been allocated adjacent to the loading bay at lower ground area. Bulky waste collection will be as required and coordinated by building management.

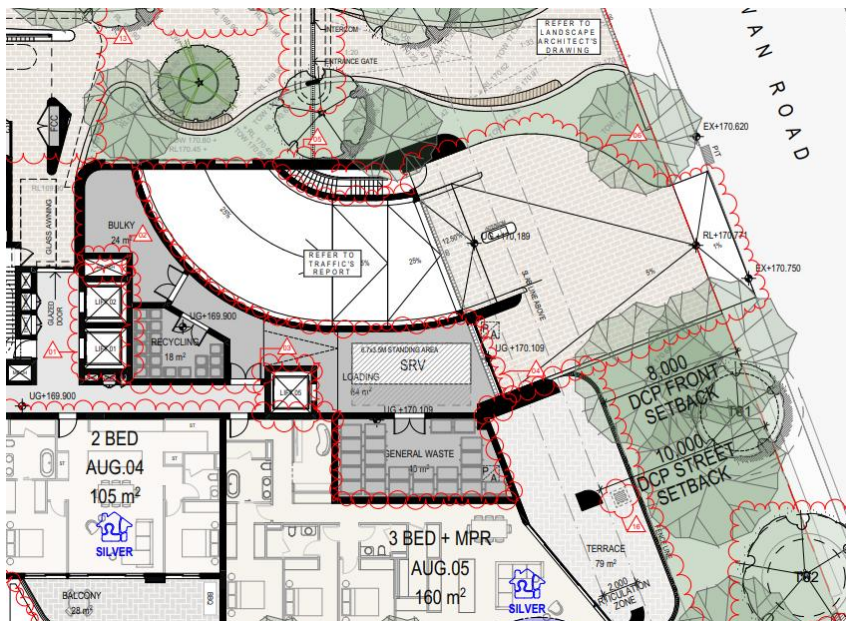


Figure 42 Proposed waste storage rooms

Source: Waste Management Plan, prepared by Colliers

Waste will be collected utilising a rear loading RCV by a Council appointed contractor from the lower ground floor level. The trucks will enter the site in a forward direction and reverse into the loading area shown in the figure below. The collection of the waste within the site will reduce noise impacts to surrounding residential receivers.

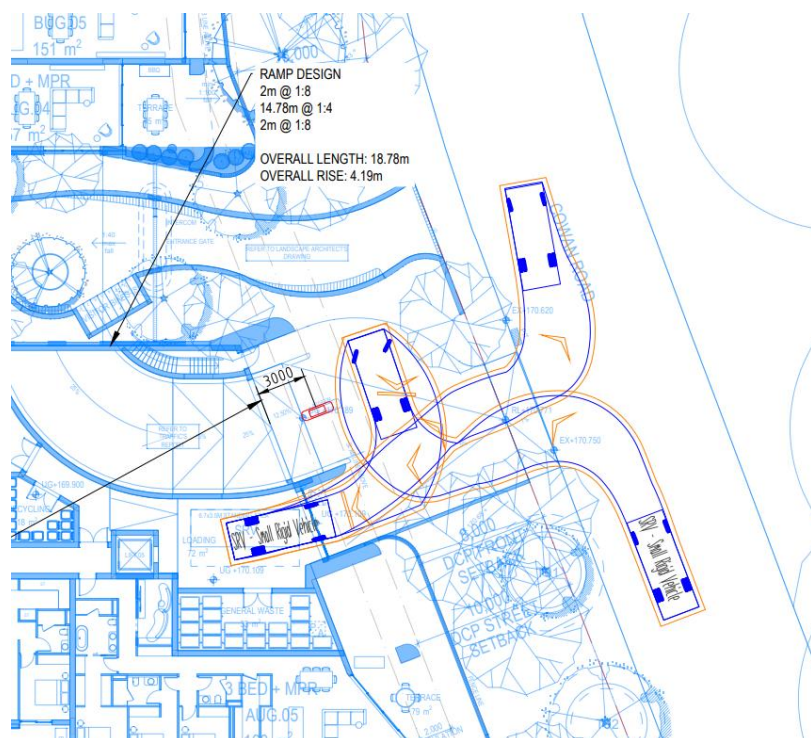


Figure 43 Waste vehicle swept paths

Source: Colliers Waste Management Plan

6.8 Development Contributions

The Ku-ring-gai Contributions Plan 2010 applies to all development within the Ku-ring-gai local government area that generates demand for the public infrastructure identified in the Plan. This includes all forms of residential development that result in the creation of additional dwellings.

The subject site is located within the St Ives Town Centre contributions catchment and is therefore subject to specific per-dwelling contribution rates. For the purposes of this proposal, the relevant March Quarter 2025 rates are:

- 2-bedroom unit: \$36,946.01 per dwelling
- 3+ bedroom unit: \$45,700.83 per dwelling

Based on the proposed dwelling mix, the total \$7.11 contribution liability can be calculated in accordance with these rates.

Additionally, Traders would like to draw to Council's attention that the applicant, Metro St Ives Pty Ltd, has already paid contributions in association with DA0270/22. Therefore Traders are seeking a credit on the 25 dwellings proposed under DA0270/22. This credit will be sought in accordance with Section 1.17 of the Ku-ring-gai Contributions Plan 2010, which states:

“in the case of existing dwellings: A credit will be given for each dwelling, however in order to secure that credit, evidence of the number of bedrooms in each dwelling on the development site must be provided as part of the Development Application or application for a Complying Development Certificate”

“in the case of allotments recently rendered vacant by demolition of previously existing residential or commercial floor space: a credit will be given only where it can be demonstrated that the floorspace was demolished with the intention of releasing the site for imminent redevelopment. The applicant must provide documentary evidence of both intent and the quantum of past floorspace and/or bedrooms by dwelling to secure any credit sought.”

If required, receipts of payment can be provided to Council.

6.9 Other Matters

An assessment of the other impacts of the development have been undertaken by the relevant specialist consultants and are appended to this SEE as set out in **Table 13**.

Table 13 Summary of the other technical assessments

Consideration	Assessment	Consultant	Appendix
Flooding	The site is not flood affected.	N/A	N/A
CPTED	The design has considered how best to enhance the security of residents and the community and has included the incorporation of principles of defensible space design throughout the development. Such measures include: • Entries to the residential building lobbies area clearly signposted. Circulation lobbies are designed to minimise obscure corners and to reduce risks of entrapment. • A fence is proposed along the western boundary which prevents access to and from the golf course. • Communal open spaces on ground are secured from the street, and experience passive surveillance from the proposed residential buildings around them. All outdoor areas are to be well-lit and subject to both active (security cameras) and passive (visual observation) surveillance. • Residential parking and visitor parking are physically separated by a roller door in basement. • Sight lines in the carpark are clear to maximise visibility when inside.	Plus Architecture	Appendix C
Structure	BG&E have provided a Structural Statement to support the development application. BG&E support the findings of the Geotechnical assessment and recommend that the basement be supported by a soldier piled wall during excavation, which will be temporarily supported by ground anchors. The geotechnical report indicates that it is likely that groundwater will be encountered over the lower portion of the basement bulk excavation. On the western side only Basement 2 will be below the water table and both basements will be affected on the eastern side of the site. Seepage will occur into the excavation area, and this will tend to occur along the soil/rock interface and through joints and bedding partings within the rock, particularly during and following rainfall. BG&E have identified two options for the Basement 2 slab. If groundwater inflow rates are low, groundwater seepage should be able to be controlled using vertical strip drains behind the wall and conventional sump and pump techniques. A conventional jointed slab on grade with subsoil drainage would be proposed for Basement 2 in this instance. The second option is a hydrostatic slab and walls. This would be required if groundwater inflow rates are too high or if the requisite Authority approvals for a drained basement are not granted. This will need to be confirmed by further geotechnical investigation and advice in the next phase of design.	BG&E	Appendix R
Sustainability	Sustainability has been considered in all aspects of the design. From a planning perspective, solar access was maximised where possible through orientation of built form. Cross-ventilation was also maximised. In addition to this, a range of design measures are proposed which further enhance the proposal from a design perspective:	Jensen Hughes, Plus Architects	Appendix B-D and T-W

Consideration	Assessment	Consultant	Appendix
	• Durable and robust façade systems with a high thermal mass • Slab extensions acting as a horizontal solar shading device • Rainwater collection and re-use within the site. • Landscape roofing that alleviates the urban heat island effect, and provides insulation to the space below • The use of PV Cells on building rooftops as a means of energy creation. • Retaining of existing trees and allocation of new trees, adding canopy coverage Jensen Hughes Pty Limited (Jensen Hughes) has been engaged by Traders in purple to provide an assessment to meet the Section J requirements of the National Construction Code (NCC) 2022, Volume 1 and a BASIX and Thermal Comfort requirements report, for the proposed project at 46-50 Cowan Road, St Ives. The report outlines and nominates the minimum prescriptive requirements for the proposed project to achieve Deemed-to-satisfy (DTS) compliance and nominates the requirements and commitments for the proposed project to achieve BASIX compliance under the relevant EP&A and Sustainable Buildings SEPP regulations. Based on the project nominated design specification, the proposed development complies or can comply with the Code under NCC2022 Section J DTS pathway and is capable of complying with the minimum BASIX and NatHers requirements.		
Services and Infrastructure	Neuron have prepared a Services Infrastructure Report to support the DA which identifies the existing infrastructure and services located in and around the site and the proposed new infrastructure, connections and augmentation of existing services required to support the development. The proposal will require the following infrastructure and services: • Electrical: The site will require one new standard 1,000 kVA kiosk substation. As part of the next phase of works, an ASP Level 03 will be engaged to begin the detailed design of this substation including consultation with Ausgrid. • Communication: - Connection to existing nbn infrastructure will be required. Consultation with NBN will be undertaken during the next stage of the project to coordinate the required works. - There is existing Telstra infrastructure already running through the site. This infrastructure will either need to be removed or relocated around the site boundary prior to excavation. Careful coordination with Telstra will be required to facilitate these modifications. Consultation with Telstra will be undertaken during the next stage of the project to coordinate the required works. • Gas infrastructure: The dial before you dig investigation reveals that there is an existing medium pressure gas main running adjacent to the proposed development along Cowan Road. We understand that gas will not be utilised in this development, meaning a gas connection and gas regulator set will not be required. The existing service connections to the site will need to be removed. • Water: The dial before you dig investigation reveals there is an existing 150mm water main running along Cowan Road. The proposed development is likely to require new 150mm mains water connection. The pressure & flow in the adjacent main was found to be weak, meaning the development will require a	Neuron and Sydney Water	Appendix S & Appendix Y

Consideration	Assessment	Consultant	Appendix
	large fire tank. A Sydney Water Coordinator has been engaged to begin consultation with Sydney Water. Sydney Water have confirmed that amplification to the water main will be required to support firefighting capacity. This will be confirmed at the S73 application stage. • Sewer: The dial before you dig investigation reveals there is an existing 150mm sewer main running close to the proposed development beneath the golf course to the west of the proposed site. This 150mm main has two previous connecting points running onto the site. The proposed development is likely to require a new 225mm mains sewer connection or multiple 150mm connections. A Sydney Water Coordinator has been engaged to consultant with Sydney Water. Sydney Water has confirmed that there is capacity to connect to existing sewer infrastructure.		
Erosion and sediment control	An erosion and sediment control plan has been prepared by BG&E and is included within the Stormwater Report and details the proposed measures to be implemented to minimise adverse impacts during construction.	BG&E	Appendix M
Fire Safety/Engineering	Preliminary Fire Safety Engineering advice has been prepared by Incode Solution to support the DA. Based on their review of the scheme, Incode are of the opinion that the development can comply with the performance requirements of the BCA and that there are no issues that would significantly affect the building layout or form, from a fire safety perspective.	Incode Solutions	Appendix X
Access	A Statement of Compliance Access for People with a Disability has been prepared by Accessible Building Solutions and is appended to this SEE. The assessment concluded that the proposed development can achieve compliance with the relevant Access provisions. Accessible Building Solutions have provided confirmation that the proposal as amended continues to meet the accessibility requirements, in the covering letter provided at Appendix P .	Accessible Building Solutions	Appendix P
BCA	A BCA Report has been prepared to assess the compliance of the development with the Building Code of Australia. The Building Code of Australia is a performance-based document, whereby compliance is achieved by complying with the Governing Requirements and the Performance Requirements. Performance Requirements are satisfied by one of the following: • A Performance Solution • A Deemed-to-Satisfy Solution • A combination of (1) and (2) The report has identified that the development is capable of complying with the BCA, subject to further assessment that can be undertaken prior to CC.	Certatude	Appendix Q
Construction Management	Traders in Purple have prepared a Construction Management Plan (CMP) which sets out the project delivery management strategies that will be implemented for the proposal. The CMP outlines the construction methodologies, public safety, and traffic management processes and procedures required from approval to practical completion. Subject to the adherence to the CMP, no adverse impacts are expected to occur during construction.	Traders in Purple	Appendix Z

Consideration	Assessment	Consultant	Appendix
Social and Economic Impacts	The proposed development will have the following social and economic impacts: • Provision of 76 high quality and amenity housing in an accessible location. • Improved landscaping outcome for the site. • Creation of construction jobs.	N/A	Throughout EIS
Suitability of the Site	The site is suitable for the proposed development for the following reasons: • It is permissible with consent and will provide a built form outcome that is consistent with the statutory controls afforded by the Housing SEPP. • It aligns with the objectives and provisions of relevant environmental planning instruments, including the Housing SEPP and ADG. • It will offer high-quality housing within the St Ives town centre within proximity to key bus routes. • The site is not significantly impacted by natural or environmental constraints.	-	-
Public Interest	The proposed development is considered to be in the public interest as it will: • Deliver 76 new dwellings in an accessible location directly responding to the NSW Government's policy mandate to improve housing choice and affordability. The site's location allows easy access to employment centres, retail, open space, and social infrastructure (schools, library's etc). • Support the National Housing Target of 1.2 million new homes • Delivering a high-quality development that achieves a high level of residential amenity and is designed with consideration for the principles of ESD. • Supporting the aspiration for a 30-minute city by providing increased housing supply adjacent to multiple bus routes.	-	-