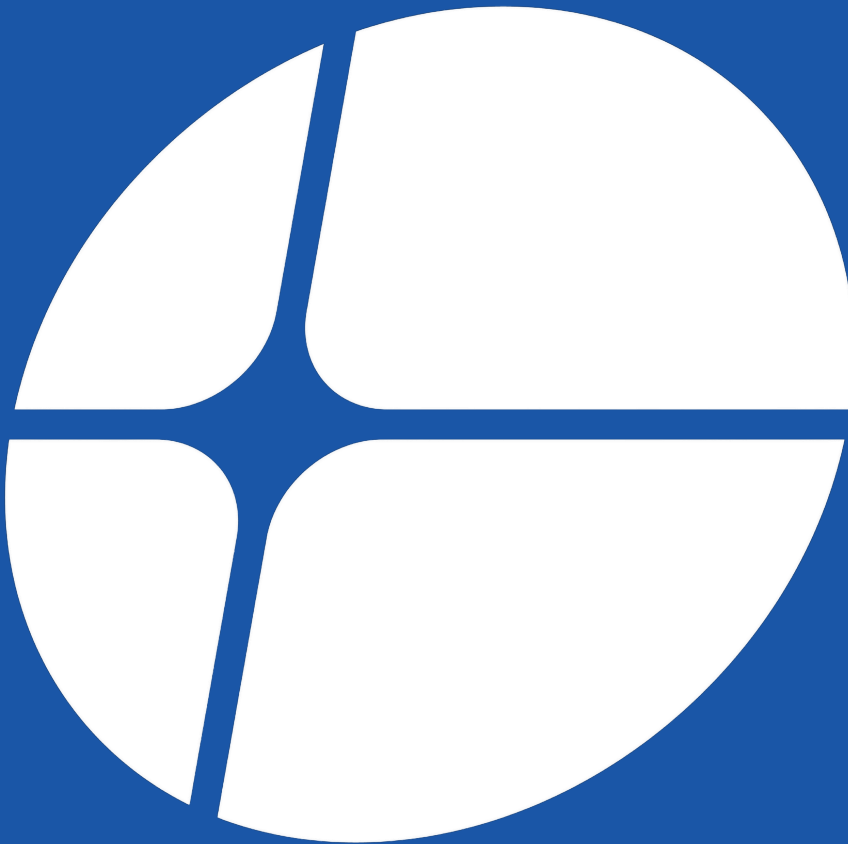


Environmental Impact Statement

State Significant Development Application

SSD 88948458



In-fill Affordable Housing
5-9 Cowan Road, St Ives

SSD 88948458

Prepared for Prosper 5-9 Cowan Road St Ives Pty Ltd
Submitted to Department of Planning, Housing and
Infrastructure

September 2025

Overview and declaration

Project details			
Project name	St Ives In-fill Affordable Housing		
SSD number	88948458		
Address	5-9 Cowan Road, St Ives		
Applicant details			
Applicant name	Prosper 5-9 Cowan Road St Ives Pty Ltd		
Applicant address	L9, 100 William Street Sydney NSW 2000		
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Declaration by Registered Environmental Assessment Planner			
I declare that this EIS: - has been prepared in accordance with sections 190 and 192 of the <i>Environmental Planning and Assessment Regulation 2021</i> - contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates - does not contain information that is false or misleading - addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project - identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments - has been prepared having regard to the Department's <i>State Significant Development Guidelines - Preparing an Environmental Impact Statement</i> - contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development - contains a consolidated description of the project in a single chapter of the EIS - contains an accurate summary of the findings of any community engagement - contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.			
Name	Jayne Klein BPlan MREP RPIA REAP (Registered Environmental Assessment Planner)		
REAP Registration	63780 - Planning Institute of Australia		
Signature	<i>Jayne Klein</i>		
Date	17/09/2025		

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Contents

Summary	9
1 Introduction.....	13
1.1 Site description.....	14
1.2 Surrounding Locality	15
1.3 Background.....	17
1.4 Related development.....	18
2 Strategic context	20
2.1 Strategic justification	20
2.2 Key features of the site and surroundings that could affect or be affected	20
2.3 Potential cumulative impacts	21
2.4 Agreements with other parties	22
2.5 Analysis of feasible alternatives	22
3 Project description.....	24
3.1 Project overview	24
3.2 Detailed description	25
4 Statutory context	35
4.1 Pre-conditions	37
4.2 Mandatory considerations	38
4.3 Contributions.....	40
5 Engagement.....	42
5.1 Engagement carried out	42
5.2 Community views.....	46
5.3 Engagement to be carried out	46
6 Assessment and mitigation of impacts.....	47
6.1 Built form.....	47
6.2 Environmental Amenity	59
6.3 Visual Impacts	63
6.4 Landscaping and trees	66
6.5 Soil and water management.....	69
6.6 Contamination and remediation.....	71
6.7 Traffic and transport.....	72
6.8 Noise and vibration	74
6.9 Biodiversity	75
6.10 Social impact	76
6.11 Pedestrian wind environment	77
6.12 Waste	78
6.13 Sustainability.....	81
6.14 Hazards and risk.....	81
6.15 Heritage	81

6.16	Accessibility	82
7	Project justification	83
7.1	Design justification.....	83
7.2	Strategic justification.....	83
7.3	Statutory justification.....	84
7.4	Social, economic and environmental justification	84
	Appendix 1: Secretary’s environmental assessment requirements table	88
	Appendix 2: Mitigation measures table	98
	Appendix 3: Strategic planning assessment	103
	Appendix 4: Statutory compliance tables	110

Figures

Figure 1: Site Location (Source: Nearmap 2025).....	14
Figure 2: View towards the site from the western side of Cowan Road (Source: Keylan).....	15
Figure 3: Broader Site Context (Base source: Nearmap).	16
Figure 4: View south-west towards site from St Ives playground (Source: Keylan)	16
Figure 5: View north along Mona Vale Road from intersection of Cowan Road and Mona Vale Road (Source: Keylan)	17
Figure 6: Acid Sulfate Soils Map (Source: Ku-ring-gai LEP 2015 Maps)	21
Figure 7: View of site from Cowan Road (Source: Keylan).....	26
Figure 8: View of site from Cowan Road (Source: Keylan).....	26
Figure 9: Proposed demolition plan (Source: PBD Architects)	27
Figure 10: Perspective looking south from Cowan Road towards the site (Source: The Monochrome)	28
Figure 11: Elevation facing Cowan Road (Source: PBD Architects)	28
Figure 12: Site Plan (Source: PBD Architects).....	29
Figure 13: Height exceedance diagram (Source: PBD Architects)	30
Figure 14: Built form response to setbacks (Source: PBD Architects).....	31
Figure 15: Southern boundary setbacks at Level 1 and 2 (Source: PBD Architects)	31
Figure 16: Northern boundary setbacks at Level 1 and 2 (Source: PBD Architects)	31
Figure 17: Landscape masterplan (Source: Arcadia).....	33
Figure 18: Public Participation Spectrum (Source: International Association of Public Participation).....	42
Figure 19: Aerial outlining sites that have been engaged (Base Source: Nearmap)	45
Figure 20: Site Analysis (Source: PBD Architects).....	48
Figure 21: Perspective looking east towards the proposal from Cowan Road (Source: Monochrome Studio)	49
Figure 22: Built form of proposal (Source: PBD Architects)	49
Figure 23: Ground floor plan (Source: PBD Architects)	50
Figure 24: Proposed height exceedance (Source: PBD Architects)	52
Figure 25: Section of proposal illustrating building setback from east and west boundary (Source: PBD Architects).....	54
Figure 26: Southern boundary setbacks at Level 1 and 2 (Source: PBD Architects)	54
Figure 27: Northern boundary setbacks at Level 1 and 2 (Source: PBD Architects).....	55
Figure 28: Low and Mid-Rise Housing Policy Indicative Map (Source: LMR Viewer)	57
Figure 29: Materials and external finishes (Source: PBD Architects)	58
Figure 30: Materials and external finishes (Source: PBD Architects)	58
Figure 31: Sun Eye View - 2pm (Source: PBD Architects).....	59
Figure 32: Sun Eye View - 3pm (Source: PBD Architects).....	60
Figure 33: Shadow Diagrams (Source: PBD Architects).....	61
Figure 34: Ground Floor Level (Source: Arcadia)	62
Figure 35: Level 7 communal space (Source: Arcadia)	62
Figure 36: Natural Cross Ventilation Levels 1-3 (Source: PBD Architects).....	63
Figure 37: Indicative locations of viewpoints	64

Figure 38: Viewpoint 1 from Cowan Road looking south towards the site (Source: Monochrome Studio)	65
Figure 39: Viewpoint 2 from Cowan Road looking east towards the site (Source: Monochrome Studio)	65
Figure 40: Ground level landscape plan (Source: Arcadia)	67
Figure 41: Level 7 landscape plan (Source: Arcadia)	68
Figure 42: Green roof planting (Source: Arcadia)	68
Figure 43: Basement 1 parking plan (Source: PBD Architects)	72
Figure 44: Existing and Post-Development SIDRA Assessment Outcome (Source: Genesis)...	73
Figure 45: Estimated Waste and FOGO Volumes (Source: Elephants Foot)	79
Figure 46: Estimated Recycling Volumes (Source: Elephants Foot)	80

Tables

Table 1: Project summary	10
Table 2: Applicant details	13
Table 3: DAs/PPs relating to the subject site	19
Table 4: Applicable state, district and local strategic plans and policies	20
Table 5: Assessment of alternative options to the proposed development	23
Table 6: Main elements of the project	25
Table 7: Statutory requirements relevant to the project	36
Table 8: Pre-conditions	38
Table 9: Mandatory considerations	40
Table 10: Consultation undertaken to date with relevant stakeholders	45

Appendices

Appendix 1: Secretary's environmental assessment requirements table
Appendix 2: Mitigation measures table
Appendix 3: Strategic planning assessment
Appendix 4: Statutory compliance
Appendix 5: Architectural Plans
Appendix 6: Clause 4.6 Variation Request
Appendix 7: Desktop Aboriginal Due Diligence Assessment
Appendix 8: EDC Report
Appendix 9: BDAR Waiver
Appendix 10: Community Housing Provider Letter
Appendix 11: Owners Consent
Appendix 12: Geotechnical Investigation Report
Appendix 13: Stormwater Management Plan
Appendix 14: Preliminary Site Investigation
Appendix 15: ESD Report
Appendix 16: Design Verification Statement
Appendix 17: Landscape Drawings and Design Report
Appendix 18: Survey Plan
Appendix 19: Architectural Design Report
Appendix 20: Certificate of Title and Strata Plans
Appendix 21: ADG compliance table
Appendix 22: Integrated Water Management Plan
Appendix 23: BASIX Certificate and NatHERS
Appendix 24: Groundwater Impact Assessment
Appendix 25: Access Report
Appendix 26: Noise and Vibration Impact Assessment
Appendix 27: Traffic Impact Assessment
Appendix 28: Operational Waste Management Plan
Appendix 29: Construction and Demolition Waste Management Plan
Appendix 30: Perspectives
Appendix 31: Pedestrian Wind Assessment
Appendix 32: Arboricultural Impact Assessment
Appendix 33: Services Design Intent Report
Appendix 34: Structural Statement
Appendix 35: MUSIC Model
Appendix 36: Dewatering Management Plan

Summary

This Environmental Impact Statement (EIS) has been prepared by Keylan Consulting Pty Ltd on behalf of Prosper 5-9 Cowan Road St Ives Pty Ltd (the applicant) to support a State Significant Development (SSD) application for the development of a residential flat building including in-fill affordable housing on land at 5-9 Cowan Road, St Ives in the Ku-ring-gai Local Government Area.

The proposed development is classified as State Significant Development (SSD) in line with Chapter 2 of the *State Environmental Planning Policy (Planning Systems) 2021*. Under Schedule 1, clause 26A of the Planning Systems SEPP, development for the purposes of in-fill affordable housing with a capital investment value more than \$75 million is considered to be SSD.

This EIS has been prepared in line with the Secretary's environmental assessment requirements (SEARs), issued by the Department of Planning, Housing and Infrastructure on 25 July 2025 and in line with its 'State Significant Development Guidelines – Preparing an Environmental Impact Statement' as required by Part 8 of the Environmental Planning and Assessment Regulation 2021.

Site and context

The site is known as 5-9 Cowan Road, St Ives. It has a total site area of 3,467.7 sqm and is legally described as SP30097 and SP34211. The site currently contains a single row of two-storey attached townhouses. The site is defined by large mature trees along the northern, eastern and western boundaries. Vehicular access to the site is provided at the southern boundary from Cowan Road.

The site adjoins St Ives Shopping Village to the north and east. Existing residential development (No. 3 Cowan Road) and St Ives Christ Church border the site to the south. To the west, two storey detached houses are located along Cowan Road.

The site is located 800-metres east of Cowan Creek which is separated from the site by Pymble Golf Club. The building heights in the immediate locality are generally single to two storeys, with increased heights of up to 5 storeys on Mona Vale Road, opposite St Ives Christ Church.

The site is accessible via bus services with stops located along Mona Vale Road which is a 4-minute walk to the south, and along Killeaton Street, which is a 9-minute walk to the north.

Project description

The SSD application seeks development consent for a proposed residential flat building, including in-fill affordable housing at 5-9 Cowan Road, St Ives (the site). The proposed works include demolition of existing structures, site preparation works, excavation and construction of the building and associated landscaping works.

Specifically, the SSDA seeks development consent for:

- demolition of the existing row of 10 attached townhouses at the site;
- construction of an 9-storey residential flat building comprising:

- 74 new dwellings (62 market residential units and 12 affordable housing units)
- 3 basement levels for car parking
- Communal open space at Ground Level and Level 7
- landscaping; and
- associated site works

The proposal also incorporates 15% of the total gross floor area for affordable housing and seeks to utilise the incentive controls under Chapter 2, Part 2, Division 1, Section 16 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) to achieve 30% additional building height and 30% additional floor space ratio (FSR).

The project elements are summarised in the table below.

Project element	Summary of the project
Project site area	Application site area: 3,467.7 m ² Extent of basement works: 3 levels
Site description	SP30097 (common area) and SP34211 (existing townhouses)
Gross floor area (GFA)	Total: 9917.6m ²
Residential apartments	74
Maximum height	29.69 metres 9-storeys
Total parking spaces	150 residential parking spaces
Cycle parking	85 bicycle spaces
Communal open space	1,228.33m ²

Table 1: Project summary

Community engagement

In accordance with DPHI's Undertaking Engagement Guidelines for State Significant Projects, stakeholder engagement has been undertaken to inform the proposal.

Community engagement includes:

- Meetings
- Emails
- Community information session

Assessment and mitigation of impacts

This EIS provides a comprehensive assessment of the potential impacts associated with the development and issues identified in the SEARs. The EIS is supported by several specialist consultant reports to consider the potential impacts of the proposed development.

Impacts considered within the EIS include:

- Built form including height, scale and communal open space
- Solar access
- Overshadowing
- Traffic and transport
- Visual Impacts
- Landscaping
- Heritage
- Geotechnical
- Noise and vibration
- Biodiversity
- Waste management
- Sustainability
- Wind
- Stormwater and wastewater

This EIS demonstrates that the development complies with the relevant controls and that potential environmental impacts are minimal and can be appropriately managed through a series of mitigation measures as set out below.

Project justification

The Commonwealth Government identifies housing affordability as a national crisis – committing \$10 billion to provide new homes across Australia. The NSW government has responded to this crisis by introducing new planning controls in accessible areas to promote new housing, including affordable housing. The delivery of higher density apartment living in Ku-ring-gai for existing and future residents is paramount to delivering new affordable housing choice.

The EIS has assessed the proposed development in line with the strategic planning framework and statutory planning framework and has also considered the likely environmental impacts and the required mitigation measures as a result. The EIS concludes that the proposed development is justified and will result in significant public benefit as set out below:

- The proposed development supports the development of a vacant and/or underutilised site within the Ku-ring-gai LGA, and St Ives.
- The proposed development is consistent with the strategic planning context including the following strategies:
 - *Greater Sydney Region Plan*
 - *North District Plan*
 - *Ku-ring-gai Local Strategic Planning Statement*
 - *Ku-ring-gai Housing Strategy*
 - *Ku-ring-gai Housing Policy*

- *National Housing Accord*
- *Future Transport Strategy 2056*
- The proposed development will facilitate a \$91,543,000 investment into the construction of the site and will facilitate over 9,917.6 m² of residential floor space.
- The development will support approximately 146 jobs over the construction period resulting in significant social benefits for St Ives, and St Ives Village Centre.
- The site is suitable for the development considering:
 - The proposed development includes 15% affordable housing to meet the shortfall of much needed affordable housing within Greater Sydney;
 - The site is well serviced by public transport with bus connections to Mona Vale, Gordon, and the Northern Suburbs;
 - The proposed development supports a superior built form outcome within the existing area, whilst responding to the intensification in an existing urban area served by social infrastructure.

1 Introduction

This Environmental Impact Statement (EIS) supports a State Significant Development (SSD) application for development of a residential flat building including in-fill affordable housing on land at 5-9 Cowan Road, St Ives in the Ku-ring-gai Local Government Area (LGA).

This application is lodged under section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The development comprises:

- demolition of the existing row of 10 attached townhouses at the site;
- construction of a 9-storey residential flat building comprising:
 - 74 new dwellings (62 market residential units and 12 affordable housing units)
 - 3 basement levels for car parking
 - Communal open space at Ground Level and Level 7
- landscaping; and
- associated site works.

The proposal also incorporates 15% of the total gross floor area for affordable housing and seeks to utilise the incentive controls under Chapter 2, Part 2, Division 1, Section 16 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) to achieve 30% additional building height and 30% additional floor space ratio (FSR).

A Clause 4.6 request is submitted as part of this SSDA which addresses the variation from the development standard in regard to building height.

The proposed development is classified as SSD under Chapter 2 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). Under Schedule 1, clause 26A of the Planning Systems SEPP, development for the purposes of in-fill affordable housing with an estimated development cost (EDC) more than \$75 million is considered to be SSD. The EDC for the project is estimated at \$91,543,000. An EDC Report is provided at Appendix 8.

On 25 July 2025, the Secretary's Environmental Assessment Requirements (SEARs) were issued, and the project was assigned the application number SSD-88948458. Consideration of the SEARs is at Appendix 1.

The Applicant's details are provided in the table below.

Applicant	Details
Name	Prosper 5-9 Cowan Road St Ives Pty Ltd
Address	100 William Street Sydney NSW
ABN	51 052 003 139

Table 2: Applicant details

1.1 Site description

The site is located at 5-9 Cowan Road, St Ives, within the Ku-ring-gai Local Government Area, and is legally described as SP30097 and SP34211. Certificate of title and strata plans at Appendix 20. The site has an area of approximately 3,467.7sqm and is rectangular in shape.

The site currently contains a single row of ten, two-storey attached townhouses. The site is defined by large mature trees along the northern, eastern and western boundaries. Vehicular access to the site is provided at the southern boundary of the site from Cowan Road. The site is relatively flat.

The site adjoins St Ives Shopping Village to the north and east. Existing residential development (No. 3 Cowan Road) and St Ives Christ Church border the site to the south. To the west, two storey detached houses are located along Cowan Road.

The site itself is not identified as a heritage item or located within a Heritage Conservation Area (HCA). It is not located within proximity of any heritage items.

The site and surroundings are shown in Figure 1 below.



Figure 1: Site Location (Source: Nearmap 2025)



Figure 2: View towards the site from the western side of Cowan Road (Source: Keylan)

1.2 Surrounding Locality

The site is located 800-metres east of Cowan Creek which is separated from the site by Pymble Golf Club. The site is also located within 105-metres of Emerald Fitness Centre, 245-metres from St Ives Village Green, and 210-metres from St Ives Playground. The building heights in the immediate locality are generally single to two-storeys, with increased heights of up to 5-storeys on Mona Vale Road, opposite St Ives Christ Church.

The site is accessible via bus services with stops located along Mona Vale Road which is a 4-minute walk to the south, and along Killeaton Street, which is a 9-minute walk to the north. The bus routes connect the site to Mona Vale, Gordon, and the Northern Suburbs.

The site location in the immediate and broader context is shown in the figure below.



Figure 3: Broader Site Context (Base source: Nearmap).



Figure 4: View south-west towards site from St Ives playground (Source: Keylan)



Figure 5: View north along Mona Vale Road from intersection of Cowan Road and Mona Vale Road
(Source: Keylan)

1.3 Background

1.3.1 Relevant history

The Department of Planning, Housing, and Infrastructure (DPHI) introduced the low and mid rise housing provisions under Chapter 6 of *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) in February 2025. This reform, known as Stage 2 of the Low and Mid-Rise Housing Policy (LMR), aims to facilitate the development of more dual occupancies, terraces, townhouses, apartments, residential flat buildings and shop top housing in designated low and mid-rise areas.

The LMR policy is part of a broader effort to increase housing supply and choice, particularly near transport hubs and town centres. This has enabled uplift for land surrounding St Ives Village Centre, noting the Centre is formally identified as a Town Centre under the *State Environmental Planning Policy (Housing) 2021 Town Centres Map*.

The proposed development directly benefits from the recently introduced LMR policy which has informed part of the key strategies as listed in Section 1.3.2 below.

1.3.2 Key strategies

The overall vision for the proposed development is to deliver high-quality market residential and affordable housing in a well-located urban area.

The proposed development intends to achieve the following objectives:

- Provision of a mix of 74 new dwellings (62 market residential units and 12 affordable housing units) within a strategically located urban site
- The project supports the National Housing Accord's goal of addressing the housing shortage and increasing housing supply, particularly in areas with established social infrastructure and community services
- Given the current demand for housing and diversity of housing types in Greater Sydney and St Ives, the proposed development in this location is considered a highly desirable housing option to address the Accord's target
- Leveraging the recently introduced low and mid rise housing policy alongside the affordable housing bonuses under the Housing SEPP to provide for a development of an appropriate size and scale with respect to its strategic location alongside an identified Town Centre. A Clause 4.6 Request accompanies this EIS to address the proposed minor height exceedance of the proposal
- The proposed development seeks to fully maximise the site's strategic location in St Ives. The proposed development is directly adjacent to St Ives Shopping Village which will provide a range of social infrastructure for future residents. In addition, the site is also located approximately 250 metres away from bus routes along Mona Vale Road and 600 metres away from bus routes along Killeaton Street
- Increased residential densification close to social infrastructure and public transport services supports a more compact, efficient urban form for the locality which is consistent with the priorities of the Future Transport Strategy 2056
- It is consistent with the long-standing State level strategic planning objective to facilitate the provision of affordable homes in existing built-up urban areas
- It will support the economy by providing approximately 146 jobs during the construction phase

1.4 Related development

The following table outlines a list of recent developments that have been constructed or are currently under construction in the locality. These recent applications demonstrate that the area is gradually transitioning to a higher density area.

A summary of the development applications that are relevant to the site are provided below.

Subject site DA	DA summary	Decision	Comments
MP10_0057 132-138 Killeaton Street	Five, 5-storey apartment buildings containing 298 residential apartments, adaptive reuse of existing building for community facilities, basement parking and landscaped open space	Approved 02/05/2011	Located within a kilometre of the subject site

Subject site DA	DA summary	Decision	Comments
SSD-48028209 - 285, 287, 287A, 289 Mona Vale Road & 1 Flinders Avenue	Construction of a new 3-storey residential care facility with 145 beds	Under Assessment	Located approx. 1.2km from site
DA0170/25 - 130 Killeaton Street	Demolition of existing structures and construction of a 7-storey residential flat building with 37-apartments.	Under Assessment	Located approx. 920m from site
DA0178/10 - 3-7 Porters Lane	Construction of a 5-storey residential flat building containing 57 units	Approved 22/12/2010	Located approx. 400m from site
DA0423/14 – 124-126 Killeaton Street	Construction of a 5-storey residential flat building consisting of 74 units	Approved 17/10/2014	Located approx. 860m from site
DA0619/11 - 13 Memorial Avenue	Construction of three 3-storey residential flat buildings with 124 units.	Approved 26/04/2012	Located approx. 460m from site
PP-2022-2519 Pymble Golf Course	Seeking to rezone a portion of the site adjoining the St Ives Shopping Village from part RE2 and part R3 to R4, increase the maximum height of buildings from 11.5m to 17.5m and FSR from 0.8:1 to 0.92:1 to enable residential flat developments of 3-5 storeys. PP also seeks to list 14 & 14 Cowan Rd as heritage items.	Approved 13/08/2024	Awaiting finalisation of the decision, Located approx. 40m from site

Table 3: DAs/PPs relating to the subject site

2 Strategic context

2.1 Strategic justification

This section of the EIS outlines key characteristics of the site and its relationship to the surrounding context. It also examines the project's alignment with relevant strategic planning policies and identifies other projects to be considered in assessing cumulative impacts.

2.1.1 Alignment to state, district and local strategic plans and policies

The proposed development is aligned with the applicable state, district and local strategic plans and policies as set out below. An in-depth assessment of the proposed development against each is at Appendix 3.

Type of strategy	Relevant plan/policy
State plans and strategies	• Greater Sydney Region Plan • North District Plan • Future Transport Strategy 2056 • National Housing Accord
State Environmental Planning Policies	• <i>(Biodiversity and Conservation) 2021</i> • <i>(Housing) 2021</i> • <i>(Planning Systems) 2021</i> • <i>(Resilience and Hazards) 2021</i> • <i>(Sustainable Buildings) 2022</i> • <i>(Transport and Infrastructure) 2021</i>
Local plans and policies	• Ku-ring-gai Local Environmental Plan 2015 • Ku-ring-gai Local Strategic Planning Statement 2020 • Ku-ring-gai Community Strategic Plan 2032 • Ku-ring-gai Housing Strategy • Ku-ring-gai Affordable Housing Policy

Table 4: Applicable state, district and local strategic plans and policies

2.2 Key features of the site and surroundings that could affect or be affected

As mentioned above, the site is currently occupied by a single row of ten, 2-storey attached townhouses. The site is immediately bound to the north and east by E1 Local Centre zoned land that consists of St Ives Shopping Village. The Shopping Village consists of a 2-storey built form that immediately adjoins the site to the east with the associated ground level car park to the north of the site (refer to Figure 1).

The surrounding development applications identified in Section 1.4 indicate that the locality is undergoing a transition to accommodate higher density residential

development in response to the provisions of the Housing SEPP, particularly on sites close to Mona Vale Road.

The site is located within close proximity to a number of bus routes that connect the site to Mona Vale, Gordon, and the northern suburbs.

An overview of the site's constraints is detailed below:

- Acid sulfate soils: The site is identified as having Class 5 Acid Sulfate Soils, as shown in figure below. This is further addressed in Section 6 of this report.
- Vegetation: The site boundaries are defined by a number of mature trees to the north, east, and west. It is noted that the site does not contain any identified Biodiversity Values land.
- The site is not identified as flood prone land or bushfire prone land.

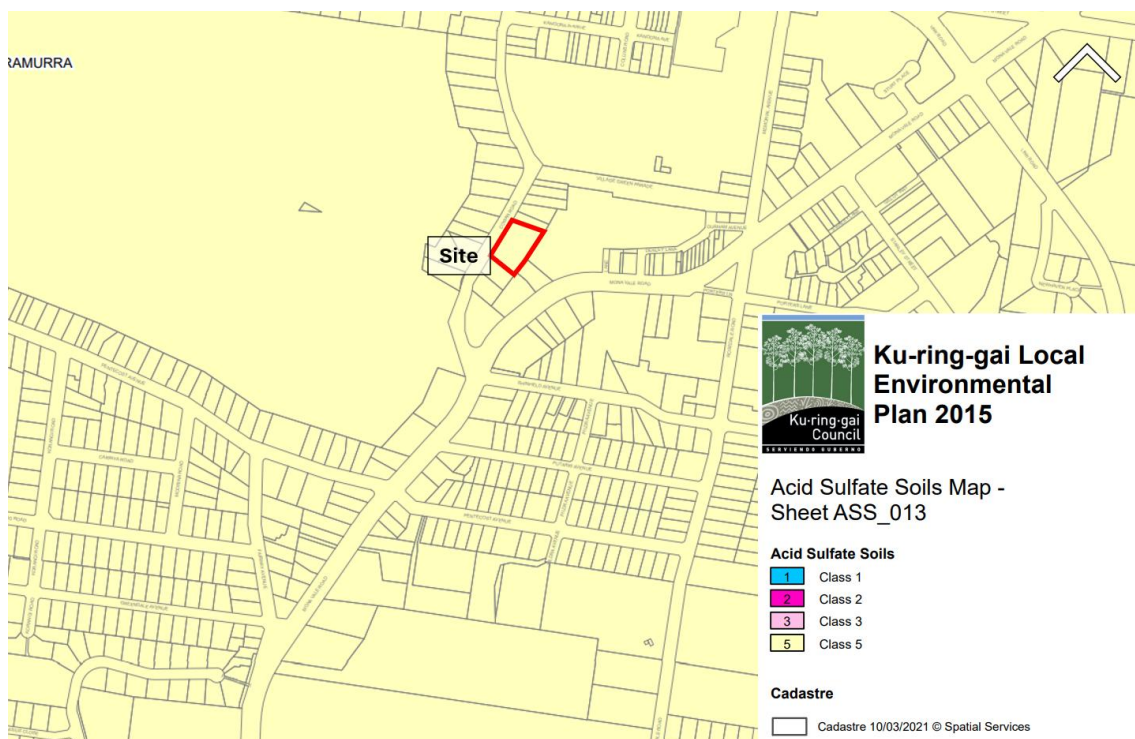


Figure 6: Acid Sulfate Soils Map (Source: Ku-ring-gai LEP 2015 Maps)

2.3 Potential cumulative impacts

The site is located close to the St Ives Shopping Village and within 400m walking distance to frequent bus services along Mona Vale Road. It is well positioned to support the growth of housing, including affordable housing, in a highly accessible area.

In accordance with DPHI's *Cumulative Impact Assessment Guidelines for State Significant Projects*, the cumulative impacts of the proposed development have been considered in Section 6 of this EIS and the accompanying reports.

The key potential cumulative impacts include:

- Traffic generation

- Construction and noise vibration
- Overshadowing
- Stormwater management
- Visual impact

Mitigation measures are recommended to appropriately address these potential impacts.

2.4 Agreements with other parties

There are no known agreements between the proponent and other parties.

2.5 Analysis of feasible alternatives

Division 5 of Part 8, Section 192 of the *Environmental Planning and Assessment Regulation 2021* requires an analysis of any feasible alternatives to the carrying out of the development.

The alternatives to the proposed development are set out in Table 5 below.

Option	Assessment
Do nothing	Retaining the site's current built form, which contains two storey terrace housing, would underutilise the land with respect to the new provisions under the Housing SEPP. The site is identified as having capacity to support substantial additional housing, including in-fill affordable housing, and is well serviced by public transport with linkages to the Northern Beaches and upper North Shore. Maintaining the site as it is will fail to utilise the site to its full potential, and not address housing supply and affordability in the area, nor will it align with the provisions of the Housing SEPP.
Alternative Massing	Alternative built form and massing studies were undertaken by PBD Architects. The massing studies considered different built form options, which had varying scales, depth, landscaped areas and amenity impacts. These massing options were discounted largely due to their excessive bulk and scale or alternatively, they under-delivered on the site's full development potential.
Alternative Location	Given the site's strategic location in relation to St Ives Shopping Village, Mona Vale Road and existing community facilities, alternative sites for this development are not considered appropriate. Technical analysis and consideration of alternative project locations determined that the redevelopment of the existing site was preferred.

Option	Assessment
	Development at alternative locations to the site is potentially contrary to the North District Plan, which seeks to concentrate housing in strategic, infrastructure-serviced locations. Alternative locations in the locality may place pressure on sites that are not currently supported by social infrastructure.
The proposal	The proposed scheme of 74 new dwellings including 62 market residential units and 12 affordable housing units will maximise the site's strategic location in St Ives and contribute to reducing the housing shortage by delivering much needed market residential and affordable homes. The current proposal best aligns with the local and strategic context and promotes a sustainable well designed built form. In addition, a range of unit sizes are proposed which contributes towards the State government's housing diversity objectives. Significant analysis and careful design were undertaken for this proposal in order to minimise impacts on the neighbouring community, which is addressed in Section 6 of this report.

Table 5: Assessment of alternative options to the proposed development

3 Project description

3.1 Project overview

The proposed development seeks consent for the demolition of the existing row of ten 2-storey townhouses on the site and construction of a 9-storey residential flat building, including in-fill affordable housing. Specifically, the proposed development comprises:

- demolition of the existing row of 10 attached townhouses;
- construction of a 9-storey residential flat building comprising:
 - 74 new dwellings (62 market residential units and 12 affordable housing units)
 - 3 basement levels for car parking
 - Communal open space at Ground Level and Level 7
- landscaping; and
- associated site works.

The proposed development utilises the provisions of Chapter 2, Part 2, Division 1 of the Housing SEPP for in-fill affordable housing. The proposed development comprises more than 15% affordable housing which enables a 30% FSR and height bonus.

Key element	Description
Project area	The site has a total area of 3,467.7 m ² The site has a frontage of approximately 60 metres to Cowan Road to the west, which is classified as a local road
Legal Description	The site is located at 5-9 Cowan Road, St Ives (SP30097 (common area) and SP34211 (existing townhouses)). Certificate of title and strata plans are at Appendix 20.
Physical layout and design	• The proposed works, design and layout consist of: • Demolition of existing structures on site • Approximately 9,917.6m² of total gross floor area (GFA) comprising approximately: ○ 8,429.96 m² of market housing GFA (62 apartments) ○ 1,487.64 m² of affordable housing GFA (12 apartments) • maximum building height of 29.69 metres • 150 car parking spaces • 85 bicycle parking spaces • 1,228 m² of communal open space area • site landscaping
Unit Mix	A total of 74 apartments are provided. The proposed unit mix comprises: • 16 2-bed homes • 58 3-bed homes
Phases	The proposed development will be undertaken in the following phases:

Key element	Description
	1. Demolition of existing structures 2. Site preparation works, including vegetation removal, earthworks and footings 3. Inground services 4. Construction and fit out of the 9-storey residential flat building 5. Landscaping and external works

Table 6: Main elements of the project

3.2 Detailed description

3.2.1 Project area

The site is located at 5-9 Cowan Road, St Ives. The site has frontage onto Cowan Road along its western boundary. The site is rectangular shaped and is currently occupied by the existing row of ten 2-storey townhouses, ancillary structures, front gardens and vegetation. Vehicular access to the site is from the existing driveway at the southern end of the townhouses from Cowan Road.

The site is located approximately 25 kilometres north of the Sydney Central Business District and approximately 10 metres west of St Ives Shopping Village.

The site adjoins St Ives Shopping Village to the north and east. Existing residential development (No. 3 Cowan Road) and St Ives Christ Church border the site to the south. To the west, two-storey detached houses are located along Cowan Road.

The site itself is not identified as a heritage item or located within a Heritage Conservation Area (HCA). It is not located within proximity of any heritage items.



Figure 7: View of site from Cowan Road (Source: Keylan)



Figure 8: View of site from Cowan Road (Source: Keylan)

The site benefits from convenient access to public transport, with multiple bus stops located along both Mona Vale Road (approximately 250m walking distance) and Killeaton Street (approximately 600m walking distance), providing accessibility to surrounding suburbs and key destinations within the region.

- Mona Vale Road supports several regular bus services. Bus stops along this corridor provide access to routes 195, 196, and 197, which offer direct connections to nearby centres such as Gordon, Macquarie Park, and Mona Vale, as well as links to train stations and other transport interchanges.
- Killeaton Street also features several bus stops that are serviced by routes 194, 194X, 195, 591, and 594. These routes further enhance accessibility by providing additional travel options, including express services such as the 194X. The available services connect passengers to a range of destinations including St Ives, the Upper North Shore, and the Sydney CBD.

Overall, the range of bus routes available within walking distance of the site supports both local and regional travel, making public transport a viable and convenient option for residents and visitors to the area.

3.2.2 Demolition and site preparation

It is proposed to demolish the existing ten 2-storey townhouses and all ancillary structures currently on site as detailed in the figure below.

The site preparation works also seek to remove some existing vegetation on site, including the removal of 32 trees, as outlined within the Arboricultural Impact Assessment (Appendix 32) and the Landscape Report (Appendix 17).

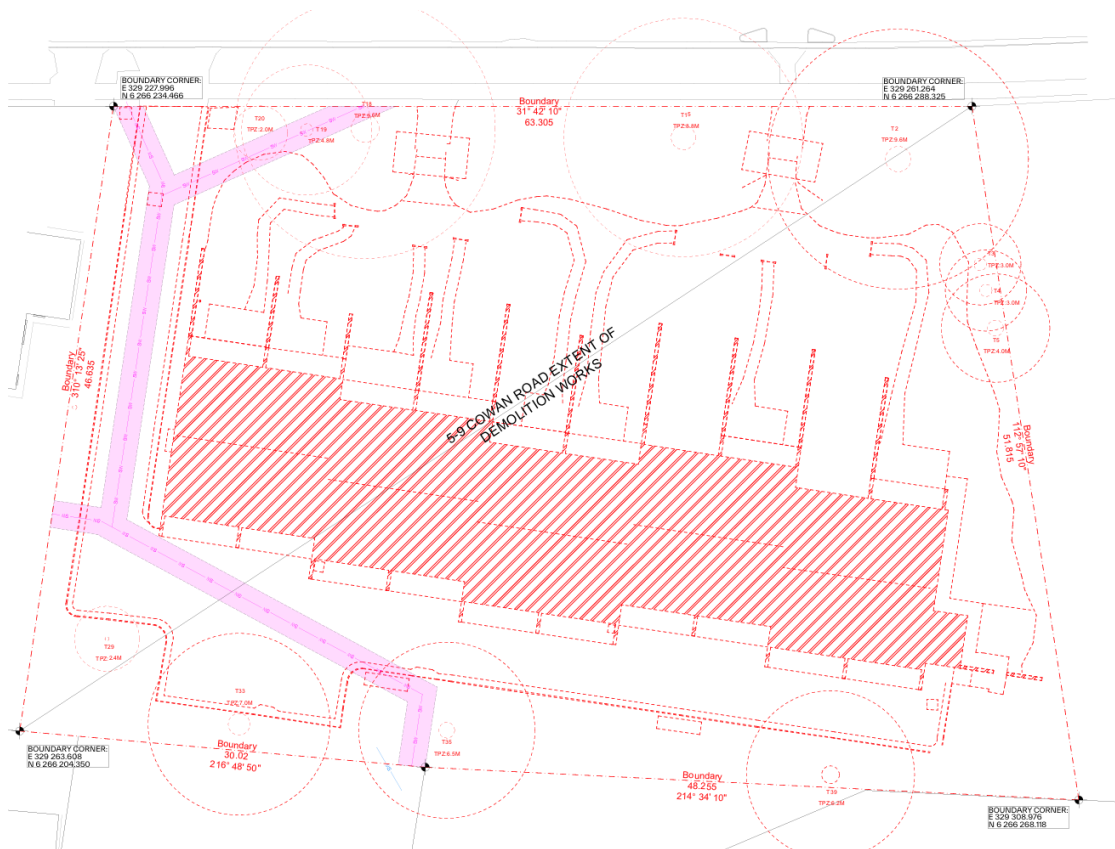


Figure 9: Proposed demolition plan (Source: PBD Architects)

3.2.3 Excavation

Excavation is required to facilitate the construction of the proposed 3 levels of basement that will facilitate car parking for the development. Excavation is proposed to a maximum depth of approximately 11 metres.

3.2.4 Physical layout and design

Built form

Architectural Plans and a supporting Design Report have been prepared by PBD Architects and are included at Appendix 5 and 19 respectively.

The proposed building is a 9-storey residential flat building over 3 levels of basement car parking, with ground floor and Level 7 communal open space. The proposed development contains a mix of 2-bedroom and 3-bedroom apartments, with a total of 74 new apartments. As mentioned above, a total of 15% of the gross floor area (GFA) will be allocated to affordable housing and integrated throughout the development.

The building adapts a modulated U-shaped built form that includes setbacks at the upper levels to reduce visual bulk, whereby the top three storeys are recessed and articulated. The building contains two vertical circulation cores, with lifts positioned toward the north and south of the site to support efficient internal layouts and improved access to daylight and natural ventilation. Each level provides from 4 to 11 apartments. Affordable housing apartments are located at Level 1 and 2 to enable integration with market housing which is provided at Ground Level and Levels 2 to 8.

The built form has been designed to maximise solar access and integration into the neighbouring context through Apartment Design Guide (ADG) compliant setbacks and by providing landscaped buffers along the site's boundaries.



Figure 10: Perspective looking south from Cowan Road towards the site (Source: The Monochrome)



Figure 11: Elevation facing Cowan Road (Source: PBD Architects)

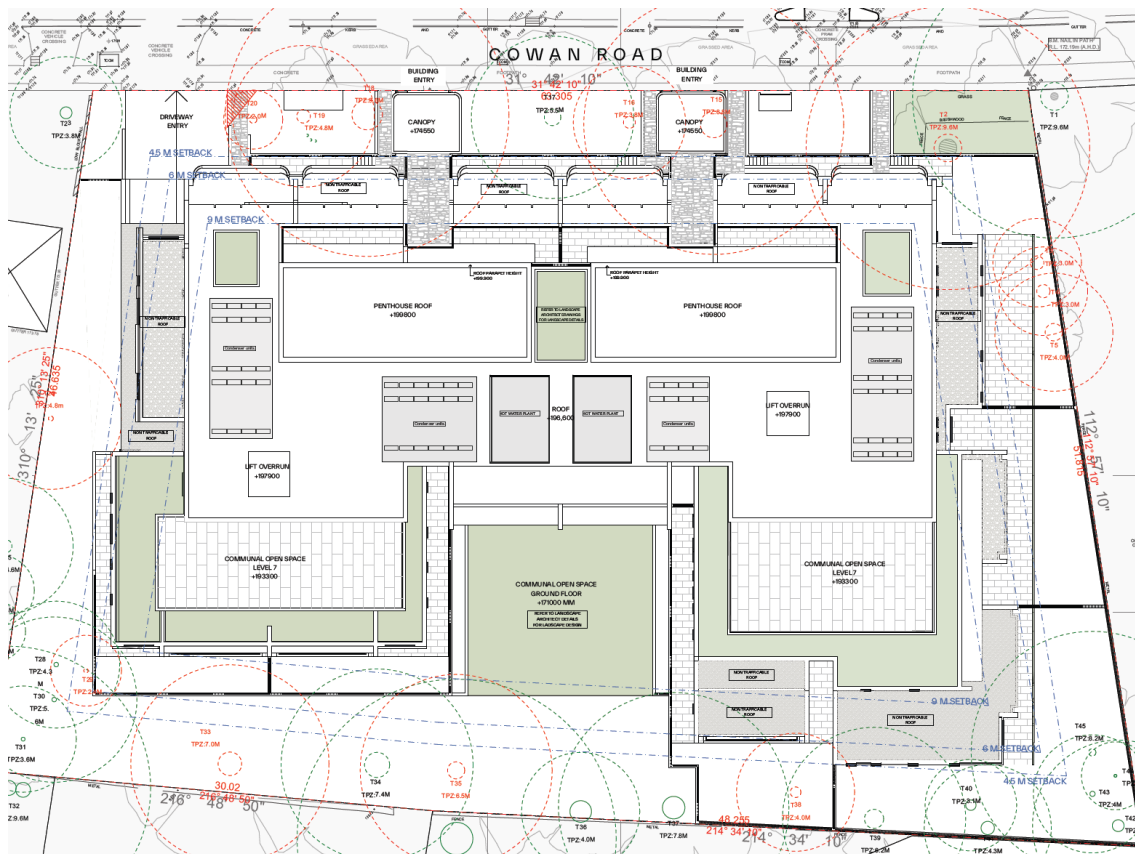


Figure 12: Site Plan (Source: PBD Architects)

The proposed built form is consistent with key ADG requirements including for solar access, natural ventilation and building separation. The architectural expression utilises a contemporary palette and articulation through horizontal slab projections, recessed balconies and variable materials, achieving a human-scaled and visually recessive form in the upper levels.

Height and Gross Floor Area

The proposed development is permissible under Chapter 6 Low and mid rise housing of Housing SEPP which permits residential flat buildings on the site. Further, the Housing SEPP includes provisions designed to encourage uplift within the locality including a maximum height of buildings (HOB) control of 22m and a maximum floor space ratio (FSR) control of 2.2:1.

The proposed development provides 'in-fill affordable housing' in accordance with Chapter 2, Part 2, Division 1 of the Housing SEPP. As per Section 16 of the Housing SEPP, these provisions allow up to 30% additional building height and FSR on top of the existing controls should 15% of the total GFA be provided as affordable housing. The 30% bonuses enable the following maximum development standards to apply to the site:

- Maximum HOB: 28.6m
- Maximum FSR: 2.86:1

The proposed development is compliant with the applicable FSR controls, as detailed below.

The proposed height of building is largely compliant with the maximum building heights set out in the Housing SEPP, with the exception of a small portion of the roof level with an exceedance of 1.09m above the 28.6m height plane. A Clause 4.6 variation request accompanies the SSDA to vary the height of buildings on site from 28.6m to 29.69m.



Figure 13: Height exceedance diagram (Source: PBD Architects)

Setbacks

The setbacks of the proposed buildings to the site's boundary line are described below:

- The proposed development provides a 4.5-metre setback from the western boundary, fronting Cowan Road
- The uppermost level (Level 8) is further recessed from the building's edge, achieving a total setback of 9 metres from the western boundary fronting Cowan Road
- The building maintains a consistent 9-metre setback to the south-eastern boundary neighbouring St Ives Shopping Village and retail premises to the south.
- To the southern and northern boundary the development maintains a 4.5m setback at lower levels and increases setbacks as the upper levels are recessed to 6m from Level 7 and 9m at the top level.

Appropriate separation distances are provided from adjoining properties and support amenity, privacy, and solar access.

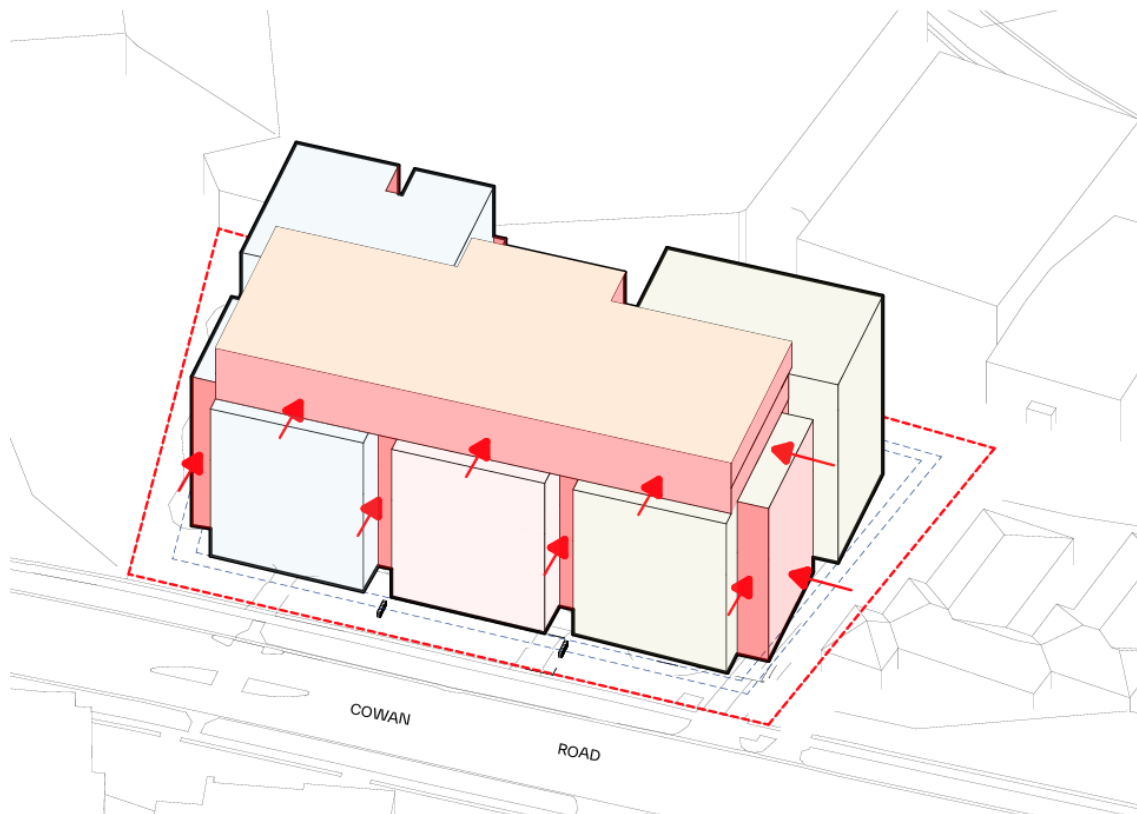


Figure 14: Built form response to setbacks (Source: PBD Architects)



Figure 15: Southern boundary setbacks at Level 1 and 2 (Source: PBD Architects)



Figure 16: Northern boundary setbacks at Level 1 and 2 (Source: PBD Architects)

Landscaping and communal space

The landscape design plays an important role in the overall quality of the development. To ensure the long-term integrity and performance of the landscape design, plant species have been selected based on their low-maintenance requirements, durability, and sustainability value. This considered approach is intended to support the ongoing health and establishment of vegetation, while preserving the visual quality and functional effectiveness of the landscape over time.

The proposed development allocates 35% of the site area (1,228.33sqm) for communal open space. This exceeds the 25% requirement of the ADG. This is largely provided in the form of two communal open space areas on the roof level.

Communal open space (COS) is provided at both Ground Level and Level 7. Ground level COS includes landscaped gardens and passive recreation areas with a focus on deep soil planting (deep soil of approximately 16.6% of site area exceeding Housing SEPP non-discretionary standard of 15%).

Level 7 outdoor communal areas include seating and shared amenity spaces, with views oriented north-west towards the Pymble Golf Course and south-east to Cowan Road.

The proposed landscaping plan masterplan is shown in the figure below. The proposed planting scheme and details are included in the Landscape Report at Appendix 17.

The development also includes an area of communal indoor space and an adjoining music room, both of which are located adjacent to the communal open space at ground level and which contribute to the amenity of the development for residents.

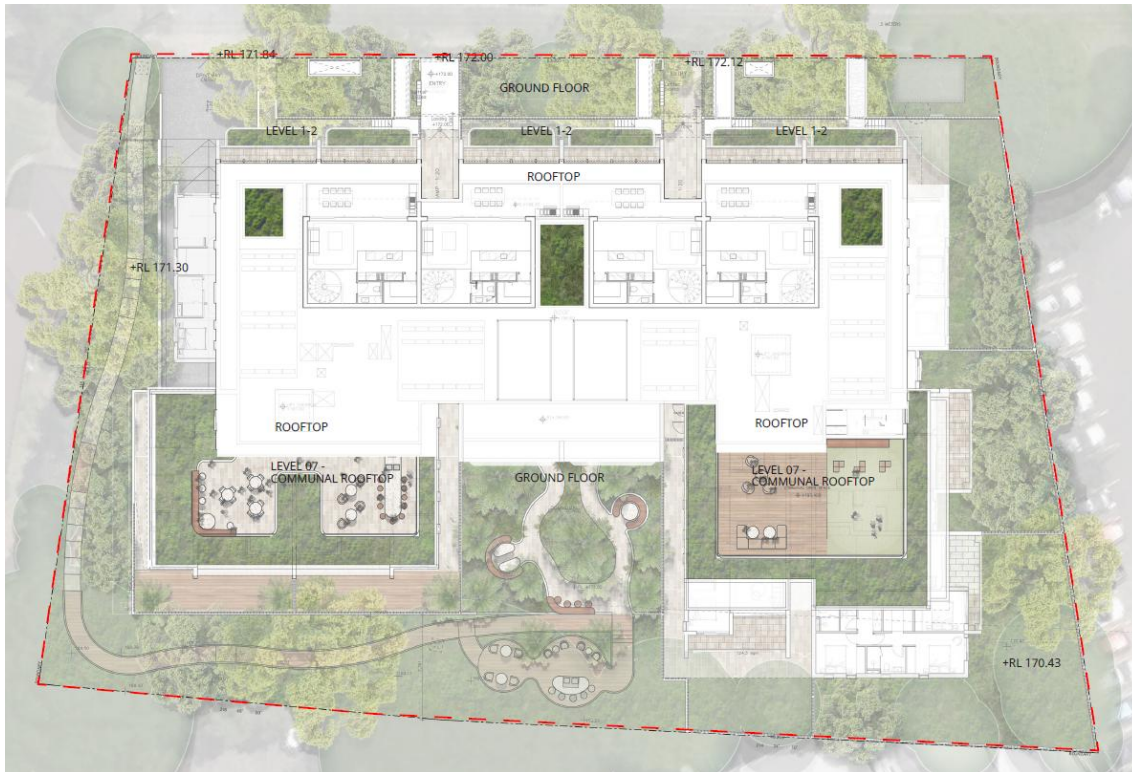


Figure 17: Landscape masterplan (Source: Arcadia)

Access and Parking

Vehicular access to the site will be provided from Cowan Road at the south-western portion of the site. This will provide the primary vehicular entrance which will align with the location of the proposed ramp down to the basement levels for future residents and visitors. Pedestrian access is proposed via a lobby accessed from two pedestrian entrances from Cowan Road.

3.2.5 Uses and activities

The proposed use of the development is wholly residential in the form of a residential flat building which includes a mix of market and affordable housing.

Affordable Housing

A total of 12 apartments will be dedicated for affordable housing and managed by a Registered Community Housing Provider (RCHP) Appendix 10. The affordable housing units are integrated throughout the development. The provision of affordable housing dwellings includes a mix of two and three bedroom apartments. The dwellings are well distributed, achieve a high level of internal amenity, and benefit from equitable access to all of the proposed communal open spaces.

3.2.6 Construction timing

Prosper, founded by Growthbuilt, has the capacity to deliver housing in this location within the National Housing Accord.

Established 20 years ago, Growthbuilt is a Gold Star ICRT rated builder with several National and State building awards. With over 180 staff with an annual turnover of over

\$370m (FY24), Growthbuilt have the capacity and experience to develop and deliver this project. Growthbuilt have both built and developed high quality residential projects, spread across a portfolio of more than 50 residential developments, where they have delivered over 2,500 dwellings across Greater Sydney and four major projects in Kuring-gai Council. Growthbuilt have delivered affordable housing for Bridge Housing, City West, Uniting, Anglicare and Land and Housing NSW, and are also the largest age care builder in Sydney (clients include Anglicare, Uniting, Aveo, and others) and Growthbuilt have a proven track record of delivering and are a fully funded group with strong relationships with several major lenders.

Subject to approval, the Prosper has the intention to complete this project by Q2 2029.

4 Statutory context

This application has been prepared pursuant to Part 4 of the EP&A Act. Further, this application is an SSD application pursuant to section 4.12(8) of the EP&A Act and requires development consent under section 4.2 of the EP&A Act.

The following legislation and environmental planning instruments (EPIs) are relevant to the proposed development:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Biodiversity Conservation Act 2016*
- *Contaminated Land Management Act 1997*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Housing) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *Ku-ring-gai Local Environmental Plan 2015*

The legislation and EPIs above have been addressed in detail at Appendix 4 and specific key considerations are addressed within the sections below.

Category	Comment
Power to grant approval	The residential component of the development has an EDC of more than \$75 million and is therefore SSD pursuant to Section 26A, Schedule 1 of the Planning Systems SEPP as follows: 26A In-fill affordable housing <i>(1) Development to which State Environmental Planning Policy (Housing) 2021, Chapter 2, Part 2, Division 1 applies if—</i> <i>(a) the part of the development that is residential development has an estimated development cost of—</i> <i>(i) for development on land in the Eastern Harbour City, Central River City or Western Parkland City in the Six Cities Region—more than \$75 million,</i> The Minister for Planning and Public Spaces (or the Minister's delegate) is the consent authority pursuant to Section 4.5(a) of the EP&A Act.
Permissibility	The proposed development is located on land which is subject to the provisions of the <i>Ku-ring-gai Local Environmental Plan 2015</i> (KLEP 2015). As noted, the site is zoned R3 - Medium Density Residential under the KLEP 2015 and ordinarily, residential flat buildings are not permitted within the zone.

Category	Comment
	Notwithstanding, the proposed development for a residential flat building is permitted with consent in the R3 zone in accordance with Chapter 6 Low and mid rise housing of the Housing SEPP. It is noted that the adjoining St Ives Shopping Village is zoned E1 Local Centre and identified as a Town Centre under the Housing SEPP.
Key Development Standards	Height As the proposed development provides 15% affordable housing, in accordance with Section 16 of the Housing SEPP the proposed development is able to utilise the incentives to achieve an additional 30% height, as outlined below: • Section 180 Non-discretionary standards, Housing SEPP (Base control): 22m • 30% incentive height bonus (Section 16 of Housing SEPP): 6.6m • Maximum height (including 30% bonus): 28.6m • Proposed Building Height: 29.69m Floor Space Ratio As the proposed development provides 15% affordable housing, in accordance with Section 16 of the Housing SEPP the proposed development is able to utilise the incentives to achieve an additional 30% of gross floor space, as outlined below: • Section 180 Non-discretionary standards, Housing SEPP (Base control): 2:2:1 • 30% incentive FSR bonus (Section 16 of Housing SEPP): 0.66:1 • Maximum FSR (including 30% bonus): 2.86:1 • Proposed FSR: 2.86:1 Affordable Housing 15% of the total GFA is proposed to be dedicated for affordable housing. The proposed affordable housing is to be dedicated for a period of 15 years pursuant to Chapter 2, Division 2, Section 21 of the Housing SEPP.
Other approvals	<i>Water Management Act 2000</i> : approval is not required under this Act, in accordance with section 4.41(e) of the EP&A Act.
Pre-condition to exercising the power to gain approval	Pre-conditions to exercising the power to gain approval are discussed at Section 4.1.
Mandatory matters for consideration	Mandatory matters for consideration are discussed at Section 4.2.

Table 7: Statutory requirements relevant to the project

4.1 Pre-conditions

The table below outlines the pre-conditions to exercising the power to grant approval that are applicable to the project and the relevant section where these matters are addressed within this EIS.

Pre-condition	EIS ref.
State Environmental Planning Policy (Resilience and Hazards) 2021	
Section 4.6 of the Resilience and Hazards SEPP requires that a consent authority must not grant consent to the development on any land unless: • it has considered whether the land is contaminated • 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 • 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. A Preliminary Site Investigation (PSI) has been prepared by GSNE Services and included in Appendix 14. The PSI identifies areas of potential environmental concern within the site. The PSI found that contaminants that may be present in some of these areas were considered to be of low significance in terms of risk to the human and environmental receptors identified. Therefore, the PSI recommends that a Detailed Site Investigation (DSI) is to be undertaken to provide further information about the presence and extent of contamination on site prior to construction.	Appendix 4 Appendix 14
State Environmental Planning (Housing) 2021	
Section 20 requires the consent authority to consider whether the residential development is compatible with the desirable elements of the character of the local area, or for precincts undergoing transition, the desired future character of the precinct. An assessment of the development's consistency with both the existing and desired future character of the area is provided at Section 6 below.	Section 6
Section 21 requires the consent authority to be satisfied that the affordable housing component will be maintained for at least 15 years and that it will be managed by a registered CHP. It is suggested that a suitable condition of consent be imposed which satisfies this requirement.	N/A
Chapter 4 Development consent must not be granted unless the consent authority has considered the quality of the design evaluated in accordance with the design principles for set out in Schedule 9 of the Housing SEPP and the NSW Apartment Design Guide. PBD Architects has prepared a compliance assessment against Schedule 9 of the Housing SEPP and the NSW Apartment Design Guide, as detailed in the Design Verification Statement and ADG Compliance table.	Appendix 4 and Appendix 21

Pre-condition	EIS ref.
Chapter 6 Low and mid-rise housing, Section 175(2) specifies that <i>'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.'</i> It is noted the proposal provides for 15% of the total GFA as affordable housing and benefits from the bonuses under Section 16 of the Housing SEPP to achieve a maximum height of 28.6m.	Appendix 4
State Environmental Planning Policy (Sustainable Buildings) 2021	
Chapter 2 Standards for residential development - BASIX, is applicable to the proposed development. A BASIX Certificate has been provided at Appendix 23	Appendix 23

Table 8: Pre-conditions

4.2 Mandatory considerations

The table below outlines the relevant mandatory considerations to exercising the power to grant approval, that are applicable to the project and the relevant section where these matters are addressed within this EIS.

Mandatory consideration	Comment	EIS ref
Environmental Planning and Assessment Act 1979		
Relevant objects of the Act (Section 1.3)	The proposed development is consistent with the objects of the EP&A act for the following reasons: - It delivers a residential flat building, including in-fill affordable housing, on a strategically located site that is readily accessible by existing infrastructure. - The site is conveniently located close to existing bus stops on Mona Vale Road and Killeaton Street, which contributes to the North District Plan's objective of providing new housing supply and diversity in well-connected locations. - The proposed development provides employment opportunities throughout the construction phase, contributing to the local economy. - Is consistent with strategic plans including the National Housing Accord, Greater Sydney Region Plan and North District Plan and allows for the orderly development of the land in line with planning objectives for urban growth and housing supply.	-

Mandatory consideration	Comment	EIS ref
	- The proposed development facilitates ecologically sustainable development as outlined in the accompanying ESD Report. - The proposed development aligns with strategic planning goals to encourage public transport use, reduce emissions, and foster accessible neighbourhoods, supporting sustainable development outcomes as promoted by regional and district plans. - The proposed development promotes the social and economic welfare of the community through the inclusion of diverse dwelling mix and affordable housing.	
Relevant environmental planning instruments (Section 4.15)	The proposed development seeks development consent under Part 4 of the Act. This EIS addresses all matters for consideration under Section 4.15 of the Act.	-
State Environmental Planning Policy (Planning Systems) 2021	The proposed development is classified SSD under Schedule 1 Clause 26A of the Planning Systems SEPP, as Chapter 2, Part 2, Division 1 of the Housing SEPP applies and the development has an EDC over \$75 million. Pursuant to Section 4.5(a) under the EP&A Act the consent authority is the Minister for Planning and Public Spaces (or the Minister's delegate).	Appendix 4
State Environmental Planning Policy (Housing) 2021.	The proposed development provides in-fill affordable housing in accordance with Chapter 2, Part 2, Division 1 of the Housing SEPP. It therefore seeks to use the available height and FSR bonuses. The site is zoned R3 Medium Density Residential under the KLEP 2015. The proposed development of a residential flat building is permissible with consent under Chapter 6 Low and mid-rise housing of the Housing SEPP. An assessment against the provisions of Chapter 2 and 6 is provided in Appendix 4.	Appendix 4

Mandatory consideration	Comment	EIS ref
State Environmental Planning Policy (Sustainable Buildings) 2022	Chapter 2 standards for residential development - BASIX are applicable to the proposed development. A BASIX Certificate has been prepared and included in Appendix 23.	Appendix 23
State Environmental Planning Policy (Transport and Infrastructure) 2021	Section 2.48 of the Transport and Infrastructure SEPP requires the consent authority to give written notice to the relevant electricity supply authority and take into consideration any response to that notice before granting consent to a development likely to affect an electricity transmission or distribution network. It is noted that DPHI will refer the application to the relevant electricity supply authority for consideration.	Appendix 4
Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015)	A full assessment of the KLEP 2015 is provided at Appendix 4.	Appendix 4
Relevant planning agreements or draft planning agreements (Section 4.15)	N/A	-
Relevant Development control plans (Section 4.15)	Development control plans do not apply to SSD as detailed under Section 2.10 of the Planning Systems SEPP.	N/A
Likely impacts of the development, suitability of the site, the public interest (Section 4.15)	The likely impacts of the development, the suitability of the site and the public interest considerations have been addressed in this application.	Section 7

Table 9: Mandatory considerations

4.3 Contributions

4.3.1 Housing and Productivity Contribution

The Housing and Productivity Contribution (HPC) came into effect in October 2023 to apply a State-wide contribution for new developments. Under the HPC, a rate of \$10,000 per dwelling / lot for high-density residential development is required. Any consent issued will impose the required contributions under the HPC.

4.3.2 Ku-ring-gai Contributions Plan 2010

Ku-ring-gai 7.11 Contributions Plan 2010 applies to the site. The payable contributions under the Ku-ring-gai contributions plan are to be imposed on any consent granted for the proposed development. This plan requires contributions pursuant to Section 7.11 of

the EP&A Act towards local infrastructure, including recreation, cultural, social facilities, parks, sporting facilities, road, and drainage works.

Affordable housing units may be eligible for partial or full exemptions from development contributions, depending on specific criteria such as ownership by a registered community housing provider and compliance with relevant planning instruments.

5 Engagement

5.1 Engagement carried out

Details of the key stakeholders identified, and a summary of the consultation undertaken and relevant issues raised to date are set out in the table below.

The engagement program has been conducted in line with the Department of Planning, Housing and Infrastructure's *Undertaking Engagement Guide: Guidance for State Significant Projects* and complies with the community engagement requirements in the SEARs.

The Guidelines require the applicant to:

- *Plan early – identity stakeholders and consider appropriate and effective engagement activities*
- *Engage as early as possible – to identify, avoid or manage issues without significant cost or delay*
- *Ensure engagement is effective - provide the information and opportunities that allow stakeholders to engage in a meaningful way*
- *Ensure engagement is proportionate to the scale and impact of the project*
- *Be innovative – use innovative means to enable participation from a broad spectrum of the community*
- *Be open and transparent about what can be influenced.*
- *Implement the community participation objectives*

The Guidelines reference the Public Participation Spectrum devised by the International Association of Public Participation (IAP2), as shown in the figure below.

Increasing impact on the decision 					
	Inform	Consult	Involve	Collaborate	Empower
Public Participation Goal	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public concerns and aspirations are consistently understood and considered	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public
Promise to the public	We will keep you informed	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible	We will implement what you decide

Figure 18: Public Participation Spectrum (Source: International Association of Public Participation)

Considering the above, the applicant has carried out and will continue to carry out a comprehensive engagement approach that is designed to give community members and stakeholders opportunities to be informed about the proposal and in return, provide meaningful feedback to inform the final design of the project.

To facilitate effective engagement in line with the aforementioned Guidelines, the applicant has:

- provided clear and concise information about the project and its impacts to the stakeholders listed in the table below
- implemented activities that encourage and facilitate participation from stakeholders
- reported back on what was heard, what has or hasn't changed, and the reason why

The applicant has tailored their engagement activities so that information is appropriate in content and context for the audience. The applicant has also considered that the engagement needs to be proportionate to the scale, likely impacts and likely level of community interest in the project.

Stakeholder	Type of engagement	Key matters of discussion	Response
Department of Planning, Housing and Infrastructure (DPHI)	• Meeting • Email	• Scoping meeting held on 16 July 2025 prior to issuing of SEARs	• The discussion at the scoping meeting informed the contents of the SSDA scoping package
Transport for NSW (TfNSW)	• Email	• An email containing the Traffic Impact Assessment for the proposed development was sent to TfNSW in line with the consultation process required by the SEARs	• TfNSW have advised they have no comments at this stage • Will provide any formal comments once DPHI provides a referral and a more thorough assessment is undertaken at EIS stage
Ku-ring-gai Council Waste Consultant	• Meeting • Email	• The small unit waste trucks that Veolia uses to service all underground carparks require a floor to ceiling clearance height of 2.6m • A maximum driveway grade of 20% (1 in 5) is required	• The discussion at the meeting has informed the preparation of the CDWMP and OWMP

Stakeholder	Type of engagement	Key matters of discussion	Response
		- Trucks are 6.7m long with a GVM of 8.5 tonnes - The front overhang is 0.680m, the rear overhang is 1.80m - Vehicles must enter and leave the basement in a forward direction - Vehicles require a turning circle of 15.2m but a 3 point turn is acceptable	
St Ives Shopping Village	Meeting	- The St Ives Shopping Village and 12 adjoining properties was sold on 1 May 2025 to Iris Capital - Future plan for the Shopping Village - The proposed development – size and scale - Potential alignment in working together	Iris Capital was supportive of the development and noted their initial focus was on the existing asset and that future plans were not on the immediate horizon
Anglicare (Uniting Church neighbouring the site to the south)	- Meeting - Email	- The proposed development – size and scale - Current use of Christ Church St Ives and discussions were raised regarding the potential to work together on a larger scheme	Additional correspondence with Anglicare after the initial meeting confirmed they were not able to work together on this site and that they were supportive of our development plans for the site

Stakeholder	Type of engagement	Key matters of discussion	Response
Cowan Road Action Group	Meeting	- A meeting was held in early August with the Chair of the Cowan Road Action Group where we discussed our plans and requested a future time to present to the group - A meeting was scheduled for 28th August but was postponed by the Action Group	A new time is being arranged for mid-September to present the development to the entire group
Pymble Golf Club	Email	An email was sent to Pymble Golf Club on 8 September 2025 with a letter of notification describing the proposal and offering to meet should they wish to know more about the proposal	A response has been received and a time is being organized to meet with the club

Table 10: Consultation undertaken to date with relevant stakeholders

Key community stakeholders consulted with to date are shown on the figure below.



Figure 19: Aerial outlining sites that have been engaged (Base Source: Nearmap)

5.2 Community views

A community information session was organised for 28 August 2025, to present the proposed development to the Cowan Road Action Group, before the lodgement of this SSDA. However, the Action Group postponed this meeting to an alternate date and instead this engagement will be held in mid-September.

5.3 Engagement to be carried out

As well as the community information session to be held mid-September, the applicant will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- continuation of engagement with relevant agencies on an ongoing basis where relevant to ensure the proposal is progressed
- the SSDA will be subject to a formal community and stakeholder engagement process during which there will be the opportunity for additional feedback and concerns to be provided - this will include public notification for at least 28 days
- following the exhibition of the application, the proponent will consider any submissions made through a Response to Submissions process, at which time any changes or additional mitigation measures will be considered.

6 Assessment and mitigation of impacts

This section provides an assessment of the environmental impacts associated with the proposed residential development. The environmental assessment is based on numerous specialist studies supporting the development.

This section provides a summary of the results of the assessment undertaken for the key issues identified by the SEARs.

The subject site is currently developed with a single row of ten 2-storey attached townhouses. It is immediately bounded to the north and east by land zoned E1 Local Centre, comprising the St Ives Shopping Village. The Shopping Village presents a two-storey built form directly adjoining the site to the east, with an associated at-grade car park located to the north.

As detailed in Section 1.4, recent and pending development applications in the surrounding area indicate a broader transition towards higher density residential development. This shift is largely driven by the planning objectives and controls introduced under the Housing SEPP, particularly for sites in proximity to key transport corridors such as Mona Vale Road.

Proposed mitigation measures are provided at Appendix 2.

6.1 Built form

The proposal is for a 9 storey residential apartment building with basement carparking with primary frontage to Cowan Road, St Ives. The key built form elements of the proposal comprise:

- Residential building envelopes providing a mix of 12 affordable apartments and 62 market residential apartments
- Communal open spaces: the building will have open space areas at ground level and level 7 for future residents designed for social interaction and resident engagement. The setbacks include at the ground floor of the building accommodate deep soil and landscaped zones
- Basement facilities: bicycle parking, car parking, visitor parking and building maintenance

The proposed design is the result of a detailed analysis of the site and surrounding properties, within the strategic planning framework of increasing housing density in the area. These investigations resulted in an initial concept for the built form which was guided by the relationship with adjoining land and the use of the development by future residents of the apartments.

Key areas of investigation included massing, setbacks, solar access and ventilation. Refer Site Analysis at Figure 20 below.

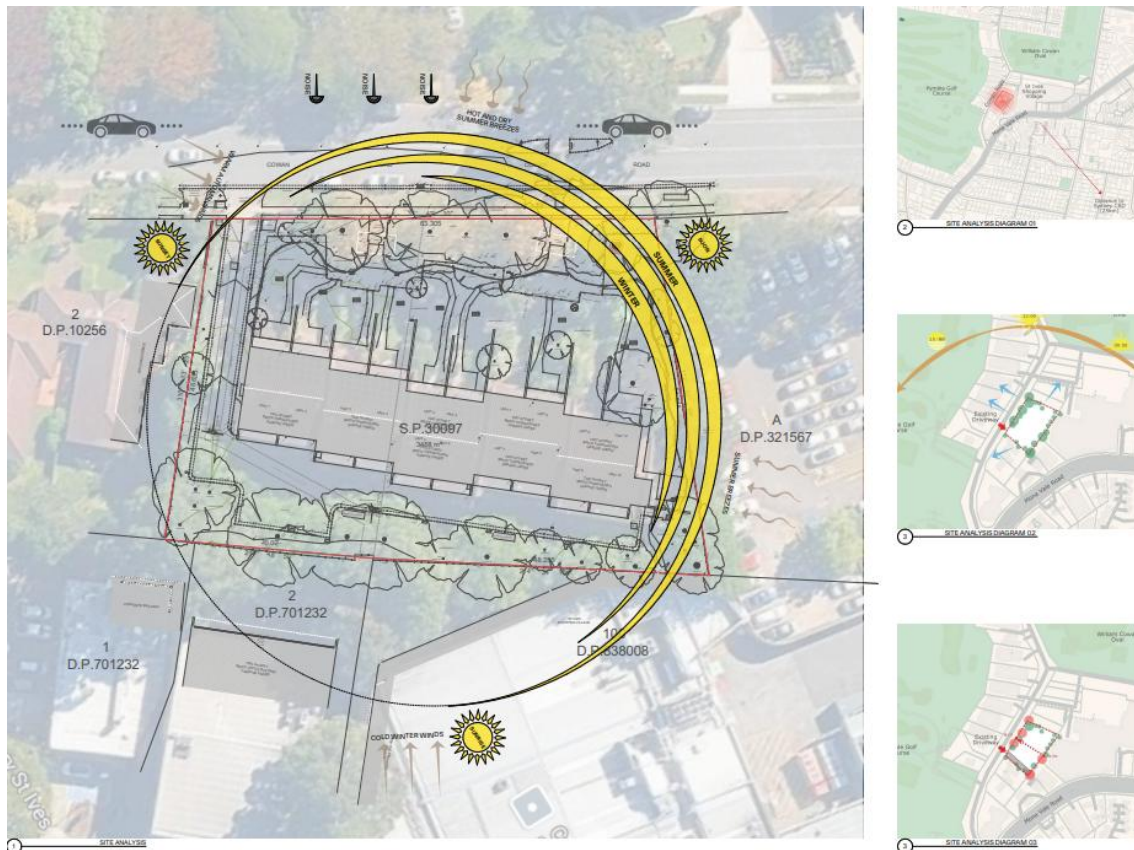


Figure 20: Site Analysis (Source: PBD Architects)

The proposed architectural plans and Design Report for the development are at Appendix 5 and 19.

The building massing of the development consists of three distinct but contiguous building elements, with the uppermost levels set back to provide articulation to the streetscape of Cowan Road and setbacks to neighbouring properties.

The site layout has been carefully designed to optimise land use efficiency and maximise functionality and solar access for living spaces. Balconies to the apartments and separation of the street facing elements of the development into three vertical elements provide further articulation and detailing to the structure of the development.

PBD Architects' ADG compliance table provides the following comment in relation to site analysis:

The design acknowledges the site's orientation, existing topography, and established landscape character of St Ives, which is predominantly low to mid rise residential framed by mature tree canopies. Opportunities such as solar access from the northern aspect and the potential for landscaped deep soil zones have been maximised to enhance residential amenity. Constraints, including the interface with neighbouring properties, existing easements, and the need to respect the visual privacy of adjacent dwellings, have been addressed through sensitive building setbacks, articulation, and landscape buffers. Informed by this analysis, the proposal integrates appropriately within its context, balancing density with landscaped character, and ensuring a built form that complements the existing and future desired character of Cowan Road.



Figure 21: Perspective looking east towards the proposal from Cowan Road (Source: Monochrome Studio)

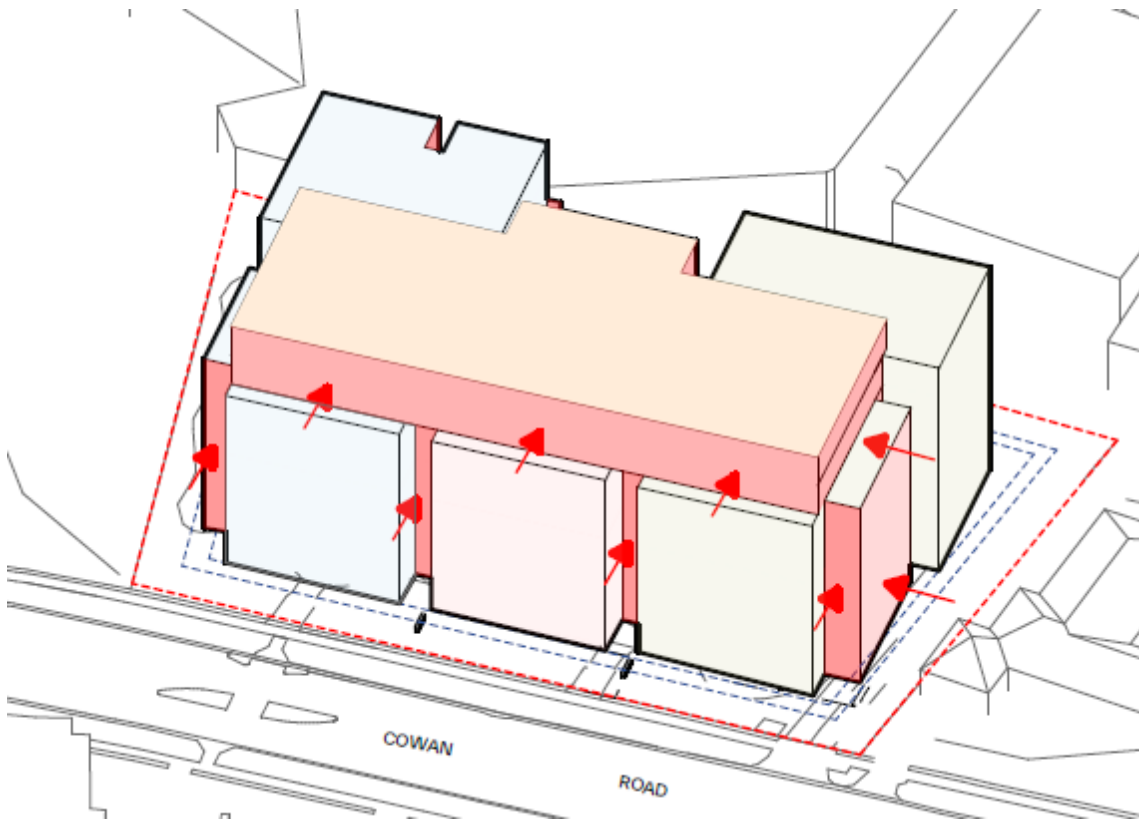


Figure 22: Built form of proposal (Source: PBD Architects)

The proposed development presents a well-considered and contextually appropriate built form that responds to both site conditions and planning objectives for the following key reasons:

- the primary built form consists of a single, rectilinear structure oriented to optimise solar access, privacy, and amenity for future residents
- the building accommodates a total of 74 residential dwellings, a mix of 62 market residential and 12 affordable homes
- high-quality communal open spaces, at both ground level and level 7 to enhance liveability and foster a sense of community among residents
- well-integrated basement level designed to support the functional needs of future residents, visitors, and building operations
- the proposed landscaping informs the built form to soften building edges and create a sense of comfort within private and communal spaces in the development.
- the basement will accommodate car parking, bicycle parking, a dedicated garbage bin room and chute system for efficient waste management, as well as a truck turning bay to facilitate safe and efficient access for service and maintenance vehicles

The architectural design seeks to deliver a refined and elegant urban design outcome through a series of articulated built form elements and carefully selected materials to break up the overall bulk and scale.

As shown in the figure below, the buildings form a U-shape which includes communal open space in a central location to provide accessible and functional amenity space for residents. In addition, the layout of the ground floor of the proposal indicates substantial areas of landscaping, including retained and new trees. In addition, there are multiple pedestrian entry points to the building directly off Cowan Road, providing increased accessibility and connections with the streetscape.

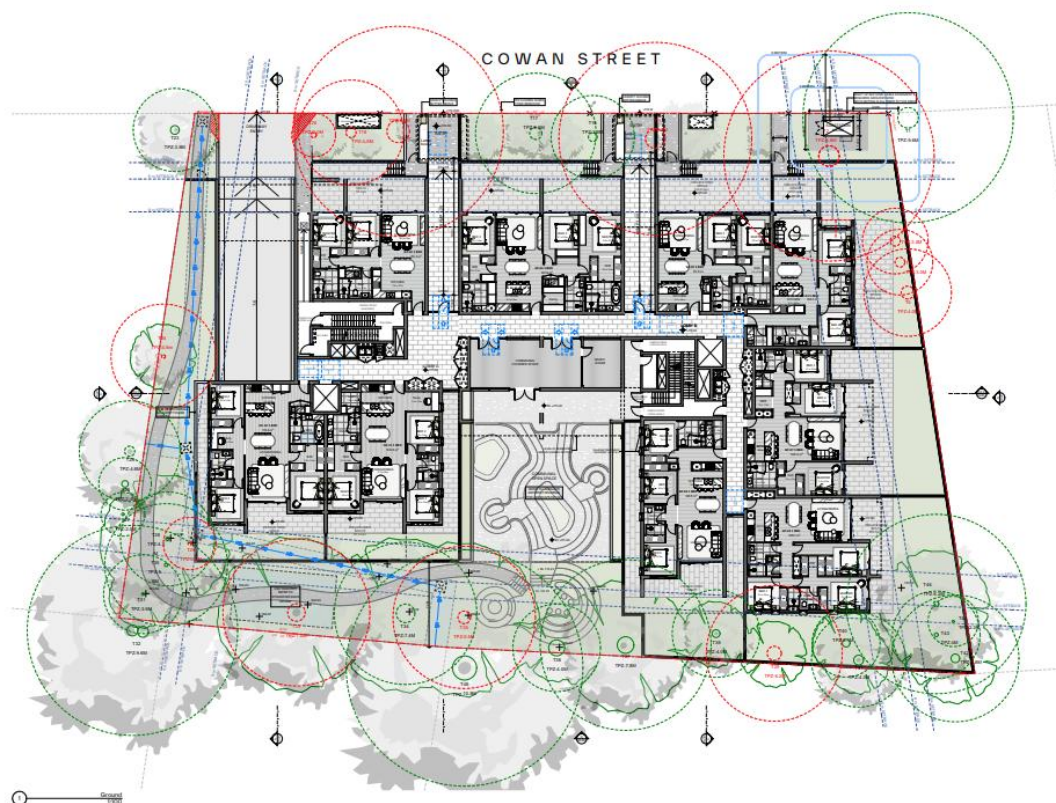


Figure 23: Ground floor plan (Source: PBD Architects)

Overall, our assessment concludes the development aligns with the provisions and objectives of the Housing SEPP, addressed in Appendix 4, as:

- The development has ensured the height of buildings is appropriate given the surrounding context of development within the area, discussed previously at section 1.3. This development aligns with the vision outlined under the Housing SEPP to encourage higher density development in serviced accessible locations.
- The site and broader locality is subject to a phase of transition under the provisions of the Housing SEPP, whereby the proposed development aligns with the future character and through architectural design will mitigate impacts on neighbouring properties.
- The site is appropriate and large enough to facilitate a residential flat building, in line with the Housing SEPP and guidelines of the ADG.

The proposed built form responds well to existing site conditions, topography, emerging streetscape and context of the locality. The design results from well informed careful design and building articulation to provide acceptable amenity to existing and new residents alike.

Our assessment outlines the key aspects to the built form elements are as follows and discussed in detail below:

- Bulk and scale
- Building setbacks
- Apartment Design Guide and residential amenity
- Materials and finishes
- Potential future character

6.1.1 Bulk and scale

The site is subject to a base height under Chapter 6 Low and mid rise housing of the Housing SEPP and can utilise the in-fill affordable housing bonus permitted by Chapter 2 of the Housing SEPP, by incorporating 15% of the total GFA as in-fill affordable housing.

The resultant key planning controls for the site provide the following:

Building Height

- Non-discretionary standards, Chapter 6 Housing SEPP (Base control): 22m
- 30% incentive bonus, Chapter 2 Housing SEPP: 6.6m
- Maximum height (including 30% bonus): 28.6m
- Proposed Building Height: 29.69m

Floor space ratio

- Non-discretionary standards, Chapter 6 Housing SEPP (Base control): 2:2:1
- 30% incentive FSR bonus Chapter 2 Housing SEPP: 0.66:1
- Maximum FSR (including 30% bonus): 2.86:1
- Proposed FSR: 2.86:1

The proposal seeks a maximum height of 29.69m, a minor increase of 1.09m above the 28.6m maximum height of building control. A Clause 4.6 Request is included at Appendix 6 to address the variation to the height control. This additional height will be imperceptible from any views to the development.

Although Chapter 6 of the Housing SEPP does not explicitly identify objectives of the development standard to be varied, this section makes reference to the aims and objectives of the policies which are relevant to the proposal.

The aims of Chapter 6 of the Housing SEPP are:

- 162 Aim of chapter - The aim of this chapter is to encourage the development of low and mid rise housing in areas that are well located with regard to goods, services and public transport.

Additionally, the underlying objective of Chapter 2 of the Housing SEPP states:

- 15(A) Objective of division - The objective of this division is to facilitate the delivery of new in-fill affordable housing to meet the needs of very low, low and moderate income households.

The development aligns with the above aims and objectives, notwithstanding the non-compliance with the height of building standard. The proposal is for a residential flat building, including 12 affordable housing units and 62 market residential units, that falls within the low and mid rise housing inner area due to the site directly adjoining the St Ives Shopping Village. As such, the proposal directly responds to and aligns with the aims and objectives outlined above.

The proposed exceedance is outlined in the figure below.

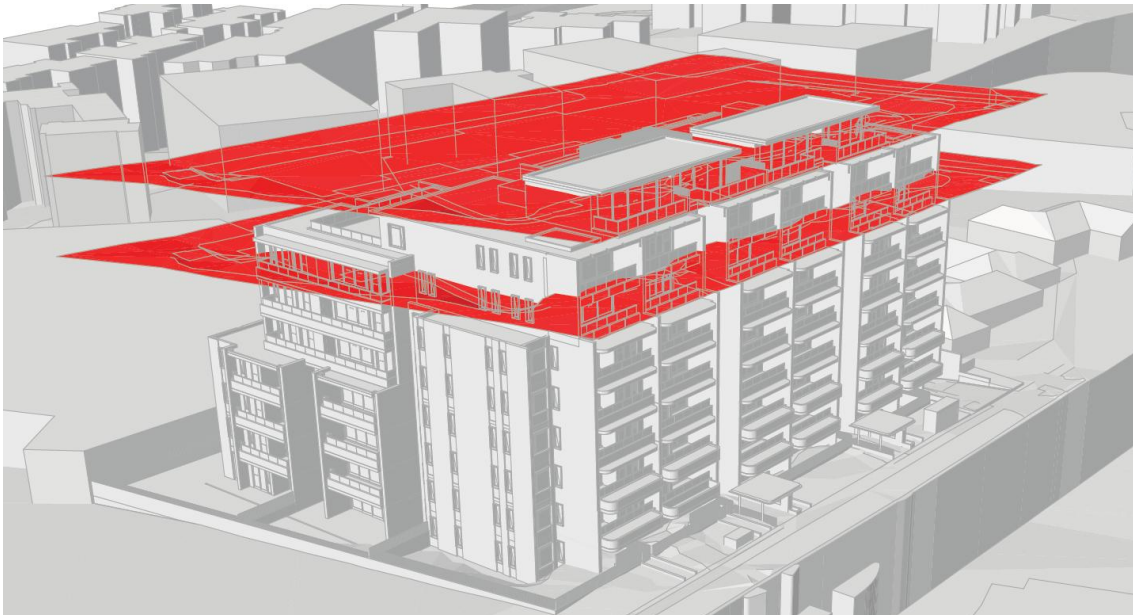


Figure 24: Proposed height exceedance (Source: PBD Architects)

The proposed design incorporates measures to reduce adverse impacts on surrounding residential properties to the immediate south, east and north, including setbacks of upper levels:

- The exceedance of the height control is localised and limited to a small portion of the roof level of the top storey which results in a minor exceedance to the height standard. This additional height does not contribute to excessive bulk or scale of this structure.
- The location of the proposed additional height in the central part of the structure is a design response to the site's topography and to minimise visual and amenity impacts on the surrounding area. Given this, the proposed height exceedance will not be readily visible from the public domain and will not noticeably add to the perceived bulk or scale of the development.
- Furthermore, due to the location and minor nature of the additional height, it will not result in adverse overshadowing or privacy impacts to adjoining residential properties or areas of open space. Overshadowing diagrams are provided at Appendix 5 which demonstrate the minimal overshadowing resulting from the exceedance of the height control.

6.1.2 Setbacks

The evolving urban context of the St Ives area has seen the project respond to the site and design in a manner that responds to the existing and future emerging character of the area.

Details of the proposed setbacks are provided in the figures below and as follows:

- The proposed development provides a 4.5-metre setback from the western boundary, fronting Cowan Road
- The uppermost level (Level 8) is further recessed from the building's edge, achieving a total setback of 9 metres from the western boundary fronting Cowan Road
- The building maintains a consistent 9-metre setback to the south-eastern boundary neighbouring St Ives Shopping Village and retail premises to the south.
- To the southern and northern boundary the development maintains a 4.5m setback at lower levels and increases setbacks as the upper levels are recessed to 6m from Level 7 and 9m at the top level.
- Appropriate separation distances are provided from adjoining properties and support amenity, privacy, and solar access



Figure 25: Section C of proposal illustrating building setback from east and west boundary (Source: PBD Architects)

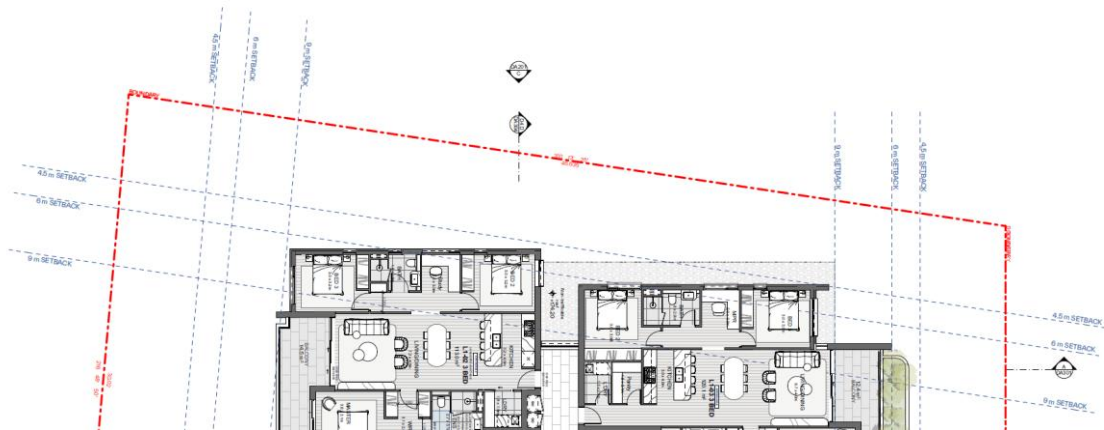


Figure 26: Southern boundary setbacks at Level 1 and 2 (Source: PBD Architects)

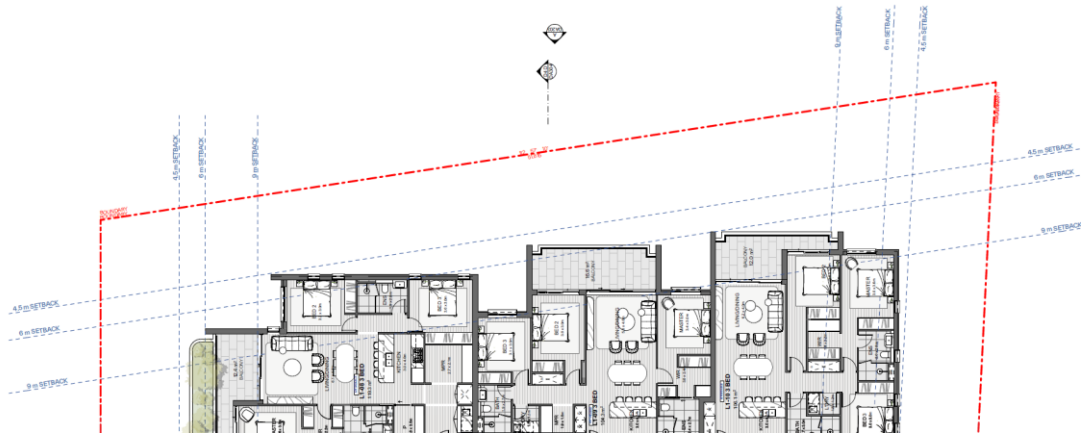


Figure 27: Northern boundary setbacks at Level 1 and 2 (Source: PBD Architects)

As outlined within the ADG compliance table prepared by PBD Architects (Appendix 21) the proposed setback is consistent with ADG building separation and the desired future character for the low to mid rise area of St Ives.

Our assessment concludes that the proposed setbacks are acceptable for the site as detailed below:

- The design provides visual privacy through increased setbacks at upper levels and a stepped façade that reduces bulk and overlooking.
- A minimum 12-metre separation is maintained between habitable rooms across the communal open space, ensuring privacy while preserving outlook and residential amenity.
- The stepping back of the built form towards the upper levels and sides of the structure enhances human scale and integration into the surrounding built form environment.
- The proposed setbacks are consistent with the character and pattern of development along Cowan Road, contributing to a cohesive streetscape and ensuring the development integrates well with its surroundings.
- The building is set back sufficiently from the boundaries, ensuring appropriate separation from neighbouring properties and minimising impacts on privacy, overshadowing and amenity.

6.1.3 Apartment Design Guide and residential amenity

The proposal has been specifically designed to provide a high quality development that exceeds key ADG criteria and numerical requirements.

A detailed assessment of the proposed development against the provisions of the ADG has been undertaken as part of the ADG compliance table at Appendix 21. This assessment demonstrates that the proposal provides a superior amenity for new and adjoining residents, as summarised below:

- 66% of apartments are naturally cross ventilated (the ADG recommends a minimum of 60%)

- 74.6% of apartments will receive 2 hours of sunlight between 9am and 3pm at mid-winter (the ADG recommends a minimum of 70%)
- 35% of the site is provided as communal open space (the ADG recommends a minimum of 25%). While a portion of the ground-floor communal open space particularly the landscaped seating areas receives direct sunlight between approximately 9:00-10:00am (21 June), the communal open spaces on Level 7 receives direct sunlight from approx. 9:00am to 3:00pm (21 June).
- 16.6% of the site area is provided as deep soil area (the non-discretionary standard of the Housing SEPP for infill affordable housing is 15%)
- The site has a tree canopy coverage of 32.3%

In addition to the above, the proposal provides for a range of communal open spaces at ground level and Level 7 to cater for the future needs and amenity of future residents.

Further assessment of residential amenity is provided below.

6.1.4 Potential future character

The proposed development has been thoughtfully designed to align with the objectives of both Chapter 2 (Infill Affordable Housing) and Chapter 6 (Low and Mid-Rise Housing) of the Housing SEPP, which encourages development of suitably serviced locations and as such allows for height increases.

The proposal will provide much-needed residential accommodation, including 15% affordable housing, in a location that is not only appropriately identified under the Housing SEPP for such land use but is also highly suitable for increased density, given its proximity to key services and infrastructure.

Importantly, the site is located immediately adjacent to the St Ives Shopping Village, which is a key hub offering a range of retail, community, transport and employment opportunities. The strategic location of the site makes it an ideal candidate for uplift in development intensity, consistent with the broader objectives of the Housing SEPP to deliver well-located housing that meets the needs of a growing and diverse population. As demonstrated in section 1.4 above, there are a number of recent developments that have been constructed or are currently under construction in the locality. These recent applications demonstrate that the area is gradually transitioning to a higher density.

Other nearby sites are anticipated to be suitable for redevelopment under the Housing SEPP, therefore the future character of the area is expected to continue to evolve to reflect the increased heights and densities permissible under the low and mid rise and in-fill affordable housing provisions of the Housing SEPP.

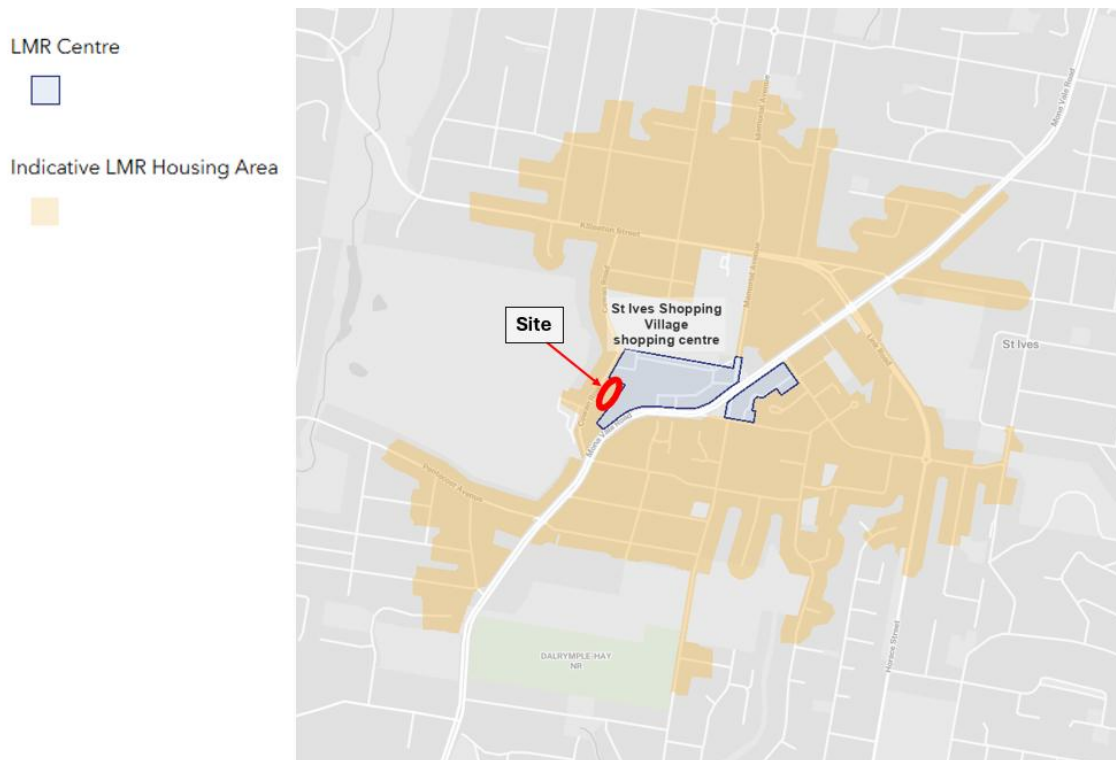


Figure 28: Low and Mid-Rise Housing Policy Indicative Map (Source: LMR Viewer)

The proposal aligns with the objectives and vision of the applicable planning framework and the principles of the Housing SEPP. The proposed bulk and scale at the site will deliver an appropriate development that leverages the strategic merit of the site, enabling an infill affordable housing development at an appropriate site that maximises its potential to contribute to the delivery of Council's housing targets.

6.1.5 Material and finishes

A cohesive palette of materials, colours, and textures has been selected to reinforce the building's aesthetic while maintaining sensitivity to its setting. Architectural Plans, prepared by PBD Architects, (Appendix 5) include a detailed summary of the materials and finishes.

The building design focuses on a modern yet timeless style, using a carefully chosen mix of materials including PGH brick, rendered painted walls, glass balustrades and aluminium frame glazing, all of which tie into the surrounding environment and reflect the area's local aesthetic

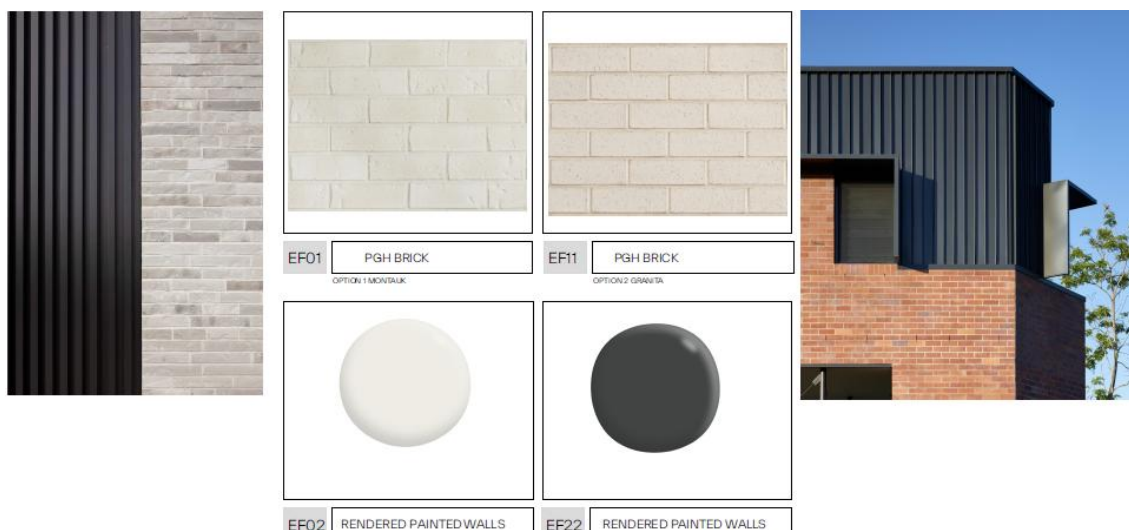


Figure 29: Materials and external finishes (Source: PBD Architects)

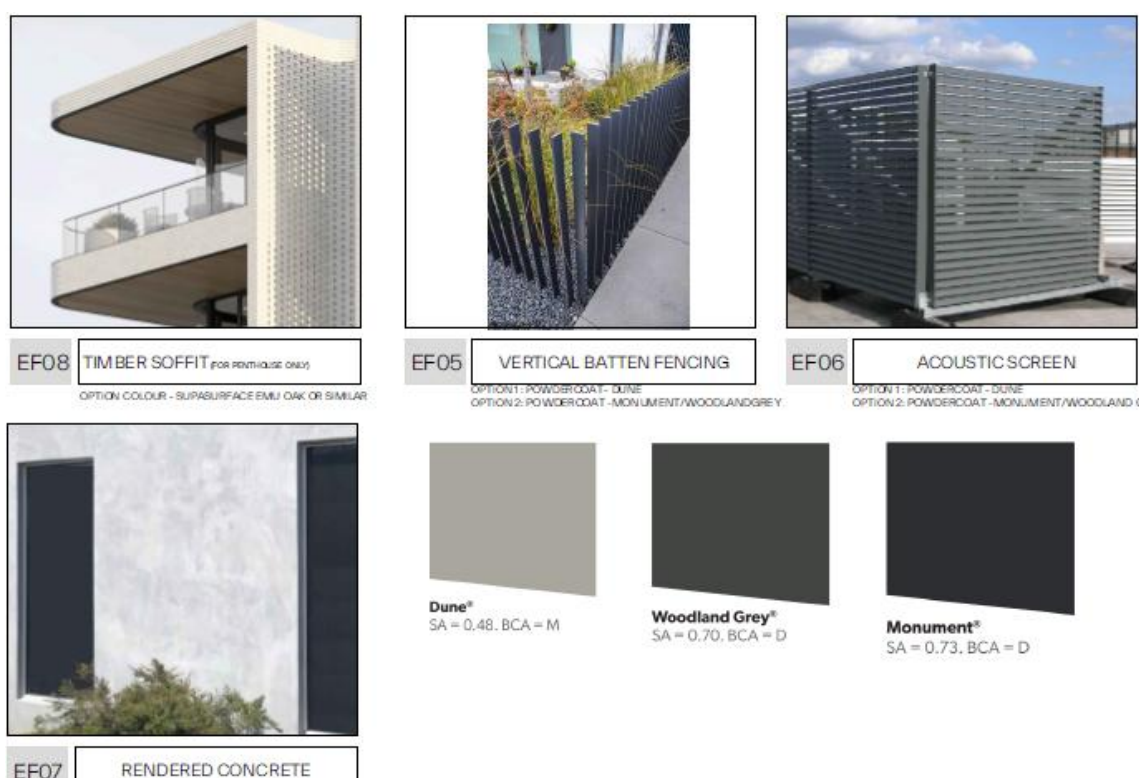


Figure 30: Materials and external finishes (Source: PBD Architects)

The proposed approach to materials, finishes and articulation of the façade creates visual interest and ensures there are no elevations where the built form presents blank monotonous facades, ensuring a positive urban design outcome for the site.

Our assessment concludes that the built form of the proposed development is suitable for the site, subject to recommended mitigation measures (Appendix 2).

6.2 Environmental Amenity

6.2.1 Solar Access

The proposed development provides a high level of solar access to the building and apartments. The floor plates have been configured to orientate living spaces to achieve maximum solar access. Setbacks have been skilfully designed to enhance the amount of solar access provided to the apartments.

In accordance with the ADG requirement of a minimum of 70%, a total of 56 units (74.6%) achieve compliant solar access (2 hours) to the living and private open spaces at mid-winter.

There are 13% of apartments which receive no direct sunlight between 9am and 3pm at mid-winter, complying with the ADG requirement of a maximum of 15%.

Solar diagrams have been prepared by PBD Architects and are included within the Architectural Plans and Design Report at Appendix 5 and 19 respectively.

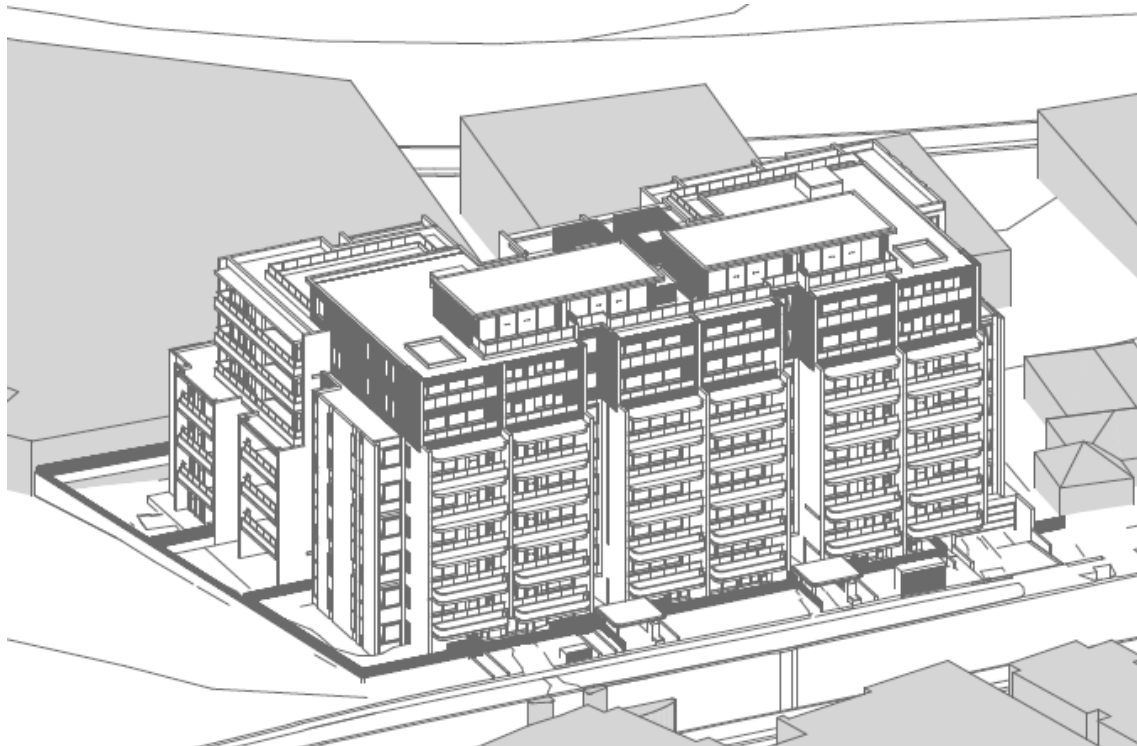


Figure 31: Sun Eye View - 2pm (Source: PBD Architects)

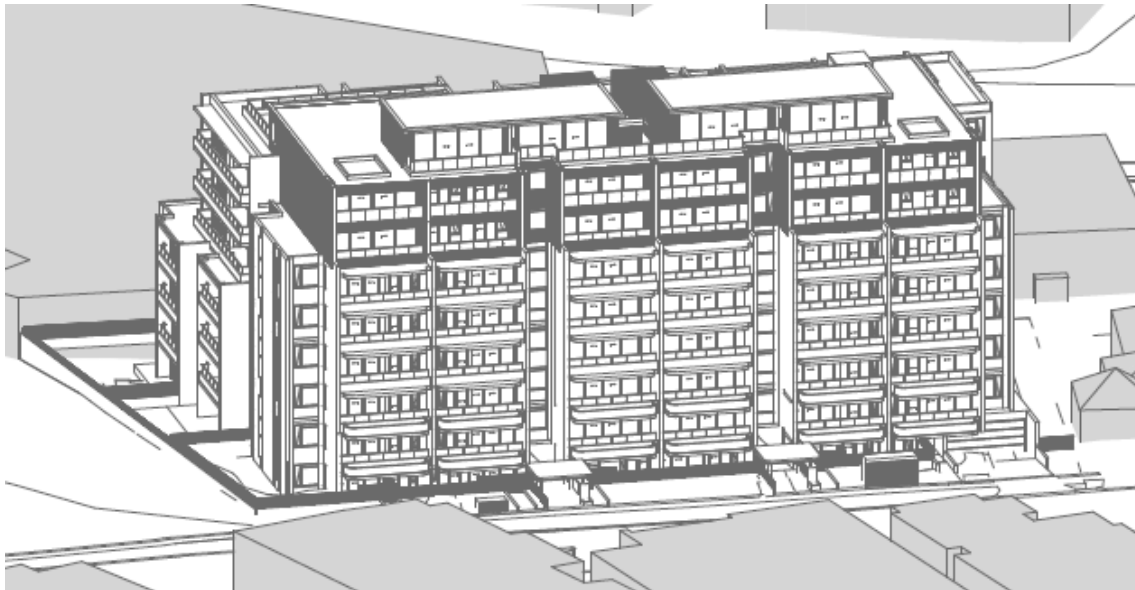


Figure 32: Sun Eye View - 3pm (Source: PBD Architects)

6.2.2 Overshadowing

The proposed development includes setbacks from all boundary lines to the building. These setbacks are designed to reduce the overshadowing impacts on developments surrounding the site.

As demonstrated in the shadow diagrams, provided in the figures below, overshadowing has been assessed at hourly intervals from 9am to 3pm. The analysis shows that overshadowing affects residential developments located to the south-west, retail developments to the south, and St Ives Shopping Village to the south-east of the subject site. The shadow diagrams demonstrate the shadows that would be cast by a building which complies with the 28.6m height limit of the bonus height controls under Chapter 2 of the Housing SEPP, compared to the minor proposed height non-compliance of an additional 1.09m.

It is noted that overshadowing impacts on the Shopping Village differ significantly from those on residential properties due to variations in use, hours of occupancy, and amenity expectations. Shopping centres will be less affected by overshadowing impacts as they are typically internally lit and less dependent on sunlight for amenity.

Overshadowing impacts occur progressively throughout the day, consistent with the sun's trajectory. When compared with a height-compliant scheme and due to the very minor nature of the non-compliance, the proposal results in negligible additional overshadowing. The incremental differences are very limited in extent and duration, and do not result in any additional impact on the solar access of neighbouring properties.

Overall, the proposal maintains reasonable solar access for surrounding development and is considered acceptable in this regard.



Figure 33: Shadow Diagrams (Source: PBD Architects)

6.2.3 Private and Communal Open Space

A combination of private and communal open spaces is provided for residents. Details of the open space are included in the Architectural Design Report (Appendix 19) and Landscape Design Report (Appendix 17).

Communal open space

The proposal comprises a total of 1,228.33m² (35%) of communal open space provided at Ground Floor Level and Level 7 of the development. This significantly exceeds the requirement of the ADG (25%). The communal spaces in the proposed development feature high-quality landscape and planting features.

The proposed communal open space at Ground Level is 764m². It includes outdoor formal seating, passive outdoor amenity space, lounge seating, seating nook with accessible ramp, bench seating with sunken firepit and extensive landscaping.

As shown within the Architectural Plans, it is noted that while a portion of the ground-floor communal open space, particularly the landscaped seating areas, receives direct sunlight between approximately 9:00-10:00am (21 June), the communal open spaces on Level 7 receive direct sunlight from approximately 9:00am to 3:00pm (21 June).



Figure 34: Ground Floor Level (Source: Arcadia)

The Level 7 communal open space is 606m² and provides seating nook, bench seating, session table, BBQ table integrated with group seating, casual seat with table, decking with bean bags and lounge seat, gym storage cabinet, loose foam cubes, yoga lawn - artificial turf and extensive landscaping.



Figure 35: Level 7 communal space (Source: Arcadia)

Private open space

All proposed apartments have been designed with private open space or balconies that comply with the minimum dimensions and area requirements set out in the Apartment Design Guide (ADG). Assessment against the provisions of the ADG is provided in the ADG compliance table at Appendix 21.

These private open spaces and balconies provide residents with functional private open space, supporting residential amenity and contributing to a sense of privacy and personal retreat within a higher-density setting. Balconies that are safe and appropriately designed can provide space for children to play outdoors, and the opportunity for pet ownership.

The private open spaces proposed are also important architectural elements on the outside of an apartment building, contributing to the form and articulation of the building in line with the ADG guidelines.

6.2.4 Natural Ventilation

The proposal recognises natural ventilation as a key measure of residential amenity. In this regard, 76% of all apartments are naturally cross-ventilated – exceeding the minimum ADG 60% requirement.

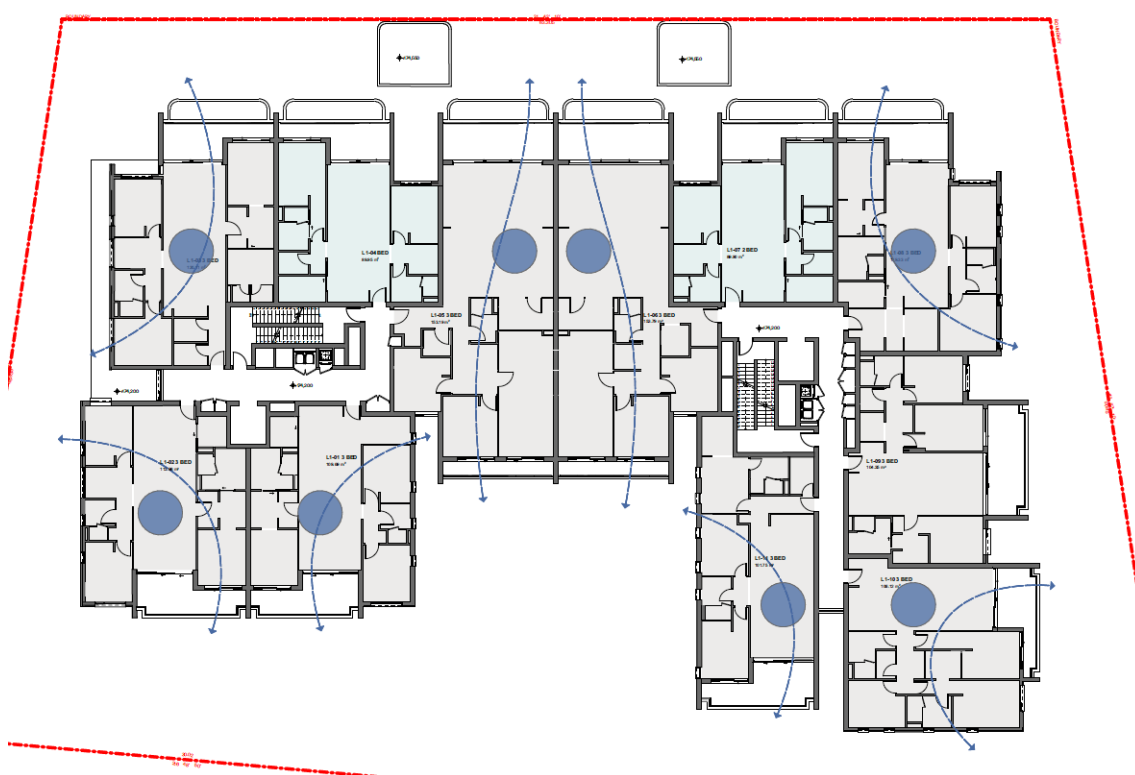


Figure 36: Natural Cross Ventilation Levels 1-3 (Source: PBD Architects)

Our assessment concludes that the proposed development provides for a high level of environmental amenity.

6.3 Visual Impacts

The proposed development involves the introduction of increased height and scale on Cowan Road, as expected as a result of the low and mid rise housing provisions and in-fill affordable housing height bonuses under the Housing SEPP.

The figures below illustrate indicative massing and perspectives showing the proposed development in its immediate context on Cowan Road.

The subject site is currently occupied by a single row of ten two-storey attached townhouses, framed by mature vegetation along the northern, eastern, and western boundaries, contributing to its visual containment.

The site adjoins St Ives Shopping Village to the north and east, while to the south it is bordered by residential development at No. 3 Cowan Road and St Ives Christ Church. The western boundary interfaces with two-storey detached dwellings fronting Cowan Road. The presence of residential, retail and religious structures is a reflection of the mixed use nature and character of the surrounding area.

An assessment of the perspectives is included below. Each perspective has been assessed in accordance with the following criteria:

- Visual sensitivity of the view
- Visual impact of the proposed development



Figure 37: Indicative locations of viewpoints



Figure 38: Viewpoint 1 from Cowan Road looking south towards the site (Source: Monochrome Studio)



Figure 39: Viewpoint 2 from Cowan Road looking east towards the site (Source: Monochrome Studio)

Viewpoint 1 represents a view from Cowan Road looking south towards the site and Viewpoint 2 represent a view from Cowan Road looking east towards the site.

6.3.1 Analysis

The provided viewpoints illustrate close-range views of the indicative height and scale of the proposed development within its immediate context, which comprises existing low- to medium-density residential dwellings and Cowan Road, including elements

such as parked vehicles and local traffic. The visual sensitivity of this location is considered low due to the prevailing built form of low to medium density developments, including residential developments, Pymble Golf Club, St Ives Shopping Village, further retail development to the south and the arterial nature of Cowan Road, which runs directly adjacent to the subject site.

The proposal introduces a 9 storey building into the visual catchment, however, the upper levels (Levels 6, 7, and 8) are recessed to reduce perceived bulk and visual prominence. Notably, the topmost level, including the proposed height exceedance, is not readily visible from the public domain along Cowan Road and is unlikely to be discernible to pedestrians or motorists, demonstrating a considered design response to the site's interface with its immediate surroundings.

The integration of extensive landscaping helps to screen the lower levels of the proposed development and further softens the presence of the development within the streetscape.

As illustrated in the figures above, the building's massing, setbacks, and articulation contribute to a built form that aligns with the desired future character of the area. The site's strategic location immediately adjacent to the St Ives Shopping Village is ideal for height and density uplift, consistent with the broader objectives of the Housing SEPP to deliver well-located housing that meets the needs of a growing and diverse population.

6.3.2 Conclusion

Overall, the visual impact of the proposal is considered to be moderate. The introduction of a 9-storey building represents a notable change within the streetscape currently characterised by low to medium density developments.

However, the site's proximity to the St Ives Shopping Village and its location within an accessible area mean it is subject to anticipated change, particularly in light of planning provisions that support increased residential density through in-fill affordable housing bonuses and low and mid rise housing policies under the Housing SEPP.

Our assessment concludes that the proposal's high-quality architectural design, careful building modulation, considered material palette, and integrated landscape treatment work together to mitigate visual impacts and ensure a sensitive transition within the evolving urban context.

6.4 Landscaping and trees

A Landscape Report has been prepared by Arcadia (Appendix 17), which sets out the landscape design for the proposed SSDA. Additionally, an Arboricultural Assessment Report was prepared by Russell Kingdom of Advanced Treescap Consulting (Appendix 32).

6.4.1 Landscaping

The Landscape Report outlines the proposed planting strategy incorporating vegetation that enhances visual interest, highlights views, generates cooler green spaces in thriving microclimates, defines functional areas, provides intimate spaces and provides shade.

The non-discretionary standards of Chapter 2 of the Housing SEPP require a minimum landscaped area that is the lesser of 35m² per dwelling or 30% of the site area. This equates to 1,040.3m² for the development. The proposed landscaped area on the site is 1,306m², complying with the non-discretionary standard.

The non-discretionary standards also require a minimum deep soil area of 15% of the site area with minimum dimensions of 3m. The proposal provides in excess of this, with 16.6% of the site area being deep soil area.

The overall landscape design aims to integrate the various landscape character zones while creating a comfortable and welcoming environment for residents. The proposed planting serves to soften the appearance of street edges and building facades, mitigating visual bulk and enhancing the overall streetscape.

As shown in the figure below, at ground level the proposal includes tree planting, passive outdoor amenity spaces, endemic shaded planting, formal seating, lounge seating, decking, seating nook and bench seating with sunken firepit. These various elements creates an inviting outdoor space for residents that includes a variety of areas for social gathering and outdoor activities.

It is evident from the figure below that tree planting is a key feature of the landscape plan and is provided on all boundaries of the site, which also promotes privacy of communal areas for residents.



Figure 40: Ground level landscape plan (Source: Arcadia)

A landscaped communal open space is provided at Level 7 of the development, offering a diverse range of recreational and social amenities for residents. The space is designed to encourage both active and passive use, featuring a variety of seating

options including bench seating, a seating nook, session table and a BBQ table integrated with group seating, yoga lawn and gym storage cabinet. Extensive landscaping enhances the amenity of the space, softens built form elements on this level and contributes to a welcoming and visually appealing communal environment for residents.



Figure 41: Level 7 landscape plan (Source: Arcadia)

The proposal incorporates green roof planting, with a soil depth of 600mm. This provides environmental benefits and contributes to additional planting on site at a level that is otherwise underutilised and reduces heat gain of the building.



Figure 42: Green roof planting (Source: Arcadia)

The proposed landscaping is considered to integrate well with the proposed built form elements and existing surrounding vegetation and landscaping in the locality. In addition, it enhances and softens the visual appearance of the proposed development, while providing multi-functional spaces with various options for use of the outdoor areas.

Our assessment concludes that the proposed landscaping is suitable for the proposed development and will enhance the appearance and amenity values of the site.

6.4.2 Tree removal

The Arboricultural Impact Assessment (AIA) identifies and evaluates individual tree specimens within and adjacent to the site, detailing species, dimensions, health status, hazard ratings, and Useful Life Expectancy (ULE). The assessment also considers

potential design constraints, including trees located on neighbouring properties, such as Trees 32 and 46, which require particular consideration due to their proximity and potential root zone overlap.

The proposal includes the retention of 14 trees and planting of 22 new trees, resulting in 36 trees included within the development. The proposed removal of 32 trees along the boundaries of the site has been determined to be necessary to enable the proposal to be developed and strategic planning objectives to be achieved, subject to the recommendations and mitigation measures of the AIA (Appendix 2).

To minimise impacts on retained trees, the report includes a set of detailed management guidelines. These include the installation of protective fencing, adherence to excavation and construction protocols within Tree Protection Zones (TPZs), and supervision of any works near retained trees by suitably qualified arborists. Prescriptions for landscaping treatments near retained trees have also been provided to avoid root disturbance and maintain tree health.

The recommendations of the AIA align with relevant Australian Standards for the protection of trees on development sites and aim to support both the environmental quality of the site and the long-term viability of retained vegetation. Ongoing arboricultural oversight is advised throughout the construction period to ensure compliance with tree protection measures and adaptive management where necessary.

Our assessment concludes that the overall tree provision ratio of 1:1.01 (trees removed / trees proposed and retained) is considered acceptable as it results in a net gain of four trees on the site. Additionally, the planned tree planting and retention will lead to a tree canopy cover of 32.3% on site.

6.5 Soil and water management

To address ground and water matters, this EIS is accompanied by the following technical reports:

- Geotechnical Investigation prepared by GSNE Services Pty Ltd (Appendix 12)
- Dewatering Management Plan prepared by GSNE Services Pty Ltd (Appendix 36)
- Integrated Water Management Plan prepared by Goldfish & Bay (Appendix 22)
- Stormwater Management Plan prepared by EI Australia (Appendix 13)
- Groundwater Impact Assessment prepared by GSNE Services Pty Ltd (Appendix 24)
- MUSIC Model (Appendix 35)

Our assessment concludes that the soil and groundwater conditions at the site and proposed stormwater management, are suitable for the proposed development subject to the recommendations and mitigation measures within the reports listed above.

6.5.1 Ground and Groundwater Conditions

The Preliminary Geotechnical Investigation Report (Appendix 12) comprised various investigation techniques including drilling three boreholes and laboratory analyses including soil salinity, aggressivity, Atterberg limits, and point load strength testing on

recovered rock cores. Groundwater seepage was identified at depths of 7.5–8.5 m. The site is classified as Class 'P' due to fill, with possible reclassification to 'H1' if fill is removed.

Foundations are recommended as strip/pad footings in residual soils or bored piles socketed into shale bedrock. Excavation will require temporary support, vibration monitoring, and may involve rock breaking. Retaining walls must accommodate earth, hydrostatic, and seismic loads. Groundwater management is advised due to seepage.

The site is a Class 'Be' (rock site) for earthquake design per AS 1170.4–2007. Recommendations include pre-construction dilapidation surveys, geotechnical monitoring, and contingency planning for ground movement. Ongoing geotechnical input is recommended during construction.

Our assessment concludes that the proposal is satisfactory in terms of geotechnical issues subject to recommendations of the Geotechnical Investigation Report.

The Groundwater Impact Assessment (Appendix 24) has assessed the potential impacts of construction and operation of the proposal. The report found that potential construction stage impacts include onsite contamination or hydrocarbon spills and increased sediment loads being discharged to downstream systems as a result of runoff from exposed areas.

Construction impacts would be managed through implementation of a Soil and Water Management Plan (SWMP) which would be prepared as part of a Construction Environment Management Plan (CEMP) and detailed planning and management of construction sites to avoid impacting overland flow paths without appropriate mitigation.

Overall, the implementation of the mitigation and management measures outlined in the Groundwater Impact Assessment, would ensure that the proposal would have a minimal impact.

6.5.2 Stormwater management

The Integrated Water Management Plan (Appendix 22) and Stormwater Management Plan (Appendix 13) address the requirements of Ku-ring-gai DCP Part 24 and *Ku-ring-gai Council Local Environmental Plan 2015 Clause 5.21*.

Although DCPs do not apply to SSD applications, the provisions of the Ku-ring-gai DCP have been used as a guiding framework for the proposed stormwater management measures.

Water Management and Onsite Detention

The proposed development requires the inclusion of an onsite stormwater detention system that has been designed in accordance with the requirements of Ku-ring-gai Council's DCP Part 24A and Technical Guideline for Water Management.

The proposed stormwater network consists of an in-ground drainage network being conveyed to the onsite detention (OSD) system at the southern low point of the site for a controlled discharge via gravity from the development.

A 10,000L rainwater tank will take in stormwater from the roof via downpipes for reuse.

Discharge from the site drains to the council system, which ultimately drains to the Rocky Creek Catchment. Therefore, the site is subject to the following council requirements:

- Permissible site discharge (PSD) of 124 l/s/ha
- Site storage requirement (SSR) of 345 m³/ha

To comply with these requirements, the OSD tank proposed for the development has been designed with a volume of 72.25m³.

Water Sensitive Urban Design (WSUD)

As per Council guidelines, a stormwater quality pollutant load model has been initiated, using MUSIC software version 6.3 (Appendix 35). Treatment cartridges are proposed in the OSD tank as required. This has been undertaken to ensure pollutant reduction at the source prior to discharge. In addition, oceanguards have been proposed in pits to ensure sediment control at the entry point.

Our assessment concludes that the proposed WSUD measures are suitable for the development.

Erosion and Sediment Control

Erosion and sediment control measures will be implemented as follows:

- topsoil from all areas to be disturbed, shall be stockpiled and later re-spread to aid vegetation
- all drainage works shall be constructed and stabilised as early as possible during development
- sediment traps shall be constructed around all pits
- disturbance to vegetation shall be limited to fill areas, roadways, and drainage lines. areas other than specified shall be disturbed only with prior approval from the council engineer
- all disturbed areas shall be revegetated as soon as the relevant works are completed
- all sediment basins and traps shall be cleaned when the structures are a maximum of 60% full of solid materials, including during the maintenance period
- a strip of turf behind and for the total length of all the kerbs shall be provided
- pit guards shall be installed around drainage pits after road works.

Our assessment concludes that the proposed erosion and sediment control measures are suitable for the development.

6.6 Contamination and remediation

A Preliminary Site Investigation has been undertaken by GSNE Services (Appendix 14).

This investigation has found there are areas of potential environmental concern from possible importation of uncontrolled fill, pesticide use, onsite migration, leaks from vehicles, metal degradation and asbestos-based building materials.

The investigation determined that the contaminants that may be present on site would be of low significance in terms of risk to human and environmental receptors. Therefore, it is recommended that a Detailed Site Investigation (DSI) is to be undertaken during design development phase, to provide further confirmation of the presence and extent of contamination on site prior to construction. This is included as a mitigation measure (Appendix 2).

A DSI is underway and will be submitted to DPHI as soon as it is available.

The Preliminary Site Investigation has found that acid sulfate soils are not present on the site.

6.7 Traffic and transport

The proposal includes 3 levels of basement parking for 150 cars and 85 bicycles with access from Cowan Road.

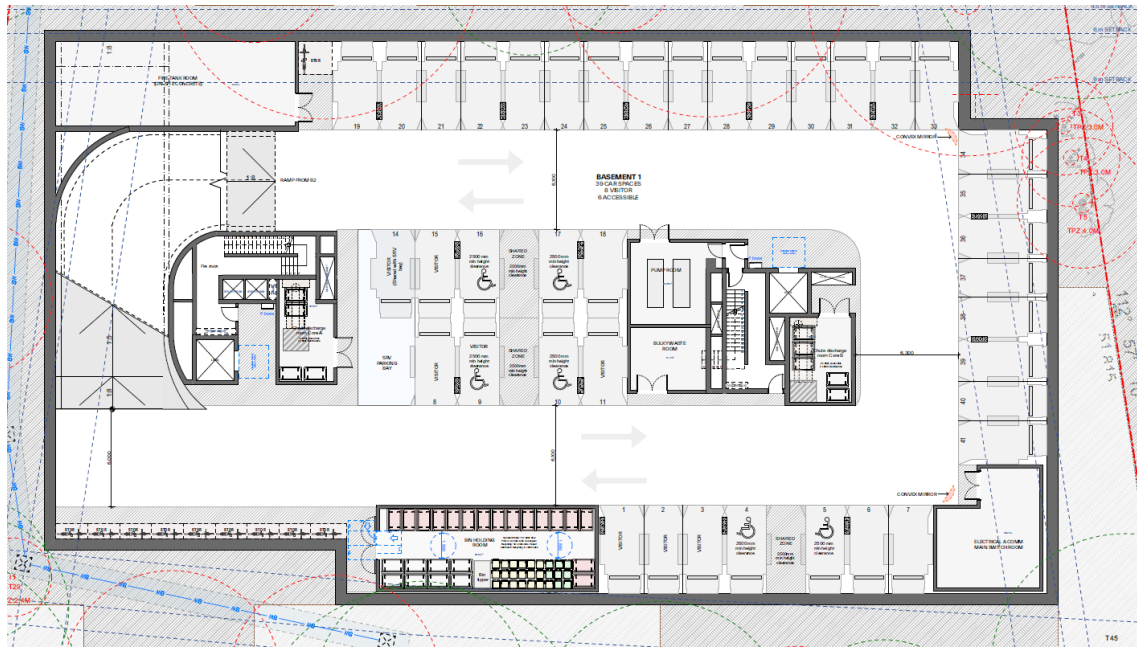


Figure 43: Basement 1 parking plan (Source: PBD Architects)

A Traffic Impact Assessment (TIA) has been prepared by Genesis Traffic to assess the traffic and parking implications for the proposed development (Appendix 27). The TIA has been prepared in accordance with Transport for NSW's (TfNSW) Guide to Transport Impact Assessment.

In summary, the TIA concludes that the net traffic generated from the proposed development is not expected to result in an adverse traffic impact on the local road network and the proposed parking provision will comply with the Housing SEPP. A further assessment is provided in the subsections below.

6.7.1 Parking

The proposal comprises 150 residential carparking spaces which complies with the non-discretionary parking rates within the Housing SEPP for affordable units and for market housing units. In addition, provision is made for 85 bicycle spaces.

While the Housing SEPP does not specify a visitor parking rate, the proposal includes 10 visitor spaces within the basement. The TIA acknowledges that as the site is directly adjacent to St Ives Shopping Village, it is likely to benefit from a high rate of linked trips, with visitors combining a stop at the future residential development with other activities such as shopping or running errands. As such, the need for dedicated, on-site visitor parking is reduced as the Shopping Village provides ample public parking to accommodate visitor demand. Therefore, the proposed provision of 10 visitor parking spaces is deemed sufficient to meet the practical needs of the development.

Based on bicycle parking figures outlined within the DCP, the proposal provides residential bike spaces within storage cages within the basement of the development and provides an additional 7 visitor bicycle spaces in the basement.

Further details of parking are outlined within the Architectural Plans prepared by PBD Architects, provided at Appendix 5 and the Traffic Impact Assessment provided at Appendix 27.

Our assessment concludes that the level of parking provided is suitable for the proposal and complies with the non-discretionary parking standards for market and affordable housing within the Housing SEPP.

6.7.2 Traffic generation

The TIA assesses the projected development traffic and uses SIDRA modelling which considers the existing traffic situation and post development situation to provide an objective comparison of traffic generation impact on the network. The results of this are outlined in the figure below.

Intersection	AM Peak			PM Peak		
	LOS	AVD	DOS	LOS	AVD	DOS
Pre-development						
Mona Vale Road, Shinfield Avenue and Cowan Road	B	16.0s	0.740	B	16.2s	0.823
Post Development						
Mona Vale Road, Shinfield Avenue and Cowan Road	B	17.0s	0.754	B	16.4s	0.831

Figure 44: Existing and Post-Development SIDRA Assessment Outcome (Source: Genesis)

The assessment has determined that the existing road network operates with sufficient spare capacity, and that current levels of service will be maintained following the addition of the proposed development. Based on this analysis, our assessment is that the development will not have an adverse impact on the operation of the existing road network. Accordingly, no infrastructure upgrades are considered necessary to support the proposal.

6.7.3 Access arrangements

The proposed point of access to the site is from Cowan Road. The TIA carried out an assessment of access to the site and confirms that the design provisions in relation to the access, car parking circulation and arrangement in respect to the proposal generally comply with AS2890 design criteria.

This access from Cowan Road will be the only vehicular access point to the site and as such has been designed to integrate with both the design and functionality of the development. The basement parking area is fully secured with controlled access via key and remote systems, limiting entry to authorised residents only.

This access point will be well-lit and designed to maintain clear sightlines, enhancing passive surveillance and user safety. Our assessment concludes that it is appropriately designed to allow for shared access for cars, bicycles and waste vehicles to enter and exit the site in a forward direction.

6.7.4 Construction traffic management

A Preliminary Construction Traffic Management Plan (CTMP) has been prepared and is provided as part of the TIA (Appendix 27). A detailed CTMP will be prepared when a builder is engaged and when all final design selections have been made.

The Preliminary CTMP establishes procedures including a construction vehicle route, emergency vehicle access, materials handling, Traffic Guidance Scheme, construction worker parking, site induction, public notification and communication, and road serviceability.

A package of information about the proposed development was issued to TfNSW on 26th August 2025. On review of the information package provided TfNSW had no further comment at this stage and state that any formal comments will be issued once DPHI provides a referral and a more thorough assessment is undertaken at EIS stage.

The preliminary construction traffic management measures are considered to be suitable at this stage of the development process. The requirement for a detailed CTMP is included as a mitigation measure at Appendix 2.

Our assessment concludes that traffic generation, access arrangements and construction traffic management are acceptable for the proposed development.

6.8 Noise and vibration

A Noise and Vibration Impact Assessment was prepared by Acoustic Logic Pty Ltd (Appendix 26). The report assesses noise and vibration impacts from traffic, mechanical plant, loading dock operations, and construction activities as a result of the proposal. Nearby sensitive receivers have been identified as residential, commercial, and a place of worship.

6.8.1 Existing noise environment

Key existing identified noise sources are road traffic from Cowan Road (daily <20,000 vehicles) and Mona Vale Road (daily >20,000 vehicles). Existing noise levels from transportation sources have been measured using the methodology outlined in the NSW Road Noise Policy which establishes a baseline for the existing noise levels currently experienced on the site within its surrounding context.

6.8.2 Operational noise

The report outlines that to achieve compliance with internal noise level criteria, façade treatments will include 6.38mm laminated glazing with acoustic seals, as well as concrete or masonry construction for walls and roofing. Ventilation strategies have been designed to ensure internal noise standards are met whether windows are open or closed.

Operational noise emissions from mechanical plant and loading dock activities have been assessed in accordance with the EPA Noise Policy for Industry (2017). Predicted noise levels from the loading dock comply with established criteria, assuming a maximum of one truck movement every 15 minutes.

6.8.3 Construction noise and vibration

Construction noise has been assessed under the NSW Department of Environment and Climate Change Interim Construction Noise Guideline, which recommends standard hours of work (Monday to Friday 7:00am - 6:00pm and Saturday 8:00am - 1:00pm).

While predicted construction noise levels may exceed noise management levels at the nearest sensitive receivers during high impact activities such as rock excavation using a hydraulic hammer, impacts are considered manageable through mitigation measures. These include installation of 1.8m high acoustic barriers along Cowan Road, use of quieter equipment where feasible, strategic scheduling of high-noise works, and proactive community engagement and notification.

Vibration impacts have been assessed against relevant NSW technical guidelines. Vibration levels associated with piling are anticipated to be moderate, and vibration monitoring is recommended to ensure impacts remain within acceptable thresholds.

A comprehensive noise and vibration management approach will be implemented and will include regular monitoring, complaint handling procedures, acoustic treatments, and detailed notification plans. Construction noise control measures will involve use of alternative, lower-noise equipment, acoustic barriers, silencing devices, and modifications to site work practices.

Overall, the project is expected to comply with relevant acoustic standards and guidelines, subject to detailed plant selection and finalised construction methodologies. Mitigation measures are proposed (Appendix 2) including that a detailed Noise and Vibration Management Plan is to be prepared at Construction Certificate stage.

Our assessment concludes that the construction and operational noise and vibration impacts are able to be managed and mitigated to an acceptable level.

6.9 Biodiversity

A Biodiversity Development Assessment Report Waiver Request was prepared by Abel Ecology.

The proposal will result in the removal of approximately 1,837 m² of vegetation canopy cover, including 1,783 m² of exotic and 224 m² of native vegetation. No threatened species, ecological communities, or habitat features were recorded or are expected to

occur due to the site's existing disturbed condition. The site does not support fauna movement corridors, significant habitat connectivity, or nearby water-dependent ecosystems.

The assessment concludes that the biodiversity impacts of the proposal are negligible and that a Biodiversity Development Assessment Report (BDAR) is not required.

A BDAR Waiver (Appendix 9) issued by DPHI confirms that the proposed development is not likely to have significant impacts on biodiversity values and that a BDAR is not required as a result.

6.10 Social impact

The proposal will provide 74 new apartments, including 12 affordable apartments (16.2%), of varying sizes in a location that is well serviced by buses and is in close proximity to the St Ives Shopping Village and other local amenities such as open space and recreational facilities.

Positive social impacts of the proposed development include:

- provision of much needed housing supply in an accessible location and close to existing amenities
- increased supply of affordable housing in the locality for very low, low and moderate income households, including access to housing for key workers
- contributes to achievement of strategic planning objectives by providing additional housing and housing diversity within the Ku-ring-gai LGA
- positive transformation of the community, by replacing older, low density housing stock with modern, higher density, energy efficient residential development
- provision for a variety of unit types to accommodate people who require increased accessibility
- employment opportunities during construction
- increased economic activity from additional residents in the area, supporting local businesses and service providers
- adoption of ecologically sustainable design elements.

Potential negative social impacts include:

- temporary construction impacts such as increased in noise, vibration, air quality and dust, waste removal
- temporary disruptions to roads, access and parking
- changes to the local character of the area, however the development will be in line with the emerging future character of the area

Any negative social impacts as a result of the proposal are associated with construction and will be temporary. The proposal is considered suitable to the site and the future character of the locality and it warrants approval subject to the implementation of mitigation measures. These mitigation measures relate to construction (Appendix 2) and include noise, dust, vibration, waste management, traffic and access.

Overall, the proposed development will deliver significant positive social benefits, including provision of housing supply and helping to achieve strategic planning objectives for the St Ives locality.

The proposed development is fully aligned with current State and Federal government policy objectives aimed at addressing the housing crisis. By delivering a mix of market and affordable housing in a well-serviced, accessible location, the proposal responds directly to the growing demand for diverse and inclusive housing options, specifically within the Ku-ring-gai LGA. The site's proximity to public transport, local services, and employment centres further supports its suitability for increased residential density, contributing to a more sustainable and equitable urban future.

Our assessment concludes that there will be overwhelmingly positive social impacts resulting from the proposed development.

6.11 Pedestrian wind environment

A Pedestrian Wind Assessment has been prepared by RWDI Australia Pty Ltd (Appendix 31).

It evaluates potential wind impacts associated with the proposed development, with a focus on pedestrian safety and comfort. The study draws on long-term meteorological data from Sydney International Airport (1995 - 2022) and considers both regional and site-specific wind patterns. Key outdoor areas assessed include adjacent footpaths, building entrances, and communal open spaces at ground level and Level 7.

The report's findings indicate that the site's immediate context, characterised by dense vegetation, undulating terrain, and predominantly low-rise built form, acts to moderate prevailing winds from the northeast, south, west, and northwest. As a result, baseline wind conditions across the site are expected to be benign, with minimal existing wind exposure.

The proposed U-shaped building form and modest height are not expected to generate adverse wind impacts. The built form is anticipated to help diffuse prevailing winds, limiting the potential for wind acceleration or channelling. Private balconies throughout the development are predicted to experience calm and comfortable wind conditions, generally suitable for sitting or standing activities throughout the year.

At Level 7, communal open spaces may experience some seasonal wind exposure, particularly from northeast and southern breezes. These effects can be effectively mitigated through design measures such as perimeter landscaping, wind screens with a minimum height of 1.5 metres, and retention of central planter boxes. Recessed entrances will remain shielded from prevailing winds and are expected to maintain comfort levels appropriate for occasional sitting use.

The report concludes that the development will achieve acceptable levels of pedestrian wind comfort and safety across all key outdoor areas, consistent with the intended uses of these spaces. The report complies with AS/NZS ISO 9001:2015 quality standards and addresses the relevant NSW environmental planning requirements.

Our assessment concludes that the proposed development is not expected to experience adverse wind conditions, subject to the recommended mitigation measures for the Level 7 communal open spaces (Appendix 2).

6.12 Waste

A Construction and Demolition Waste Management Plan (CDWMP) and Operational Waste Management Plan (OWMP) have been prepared by Elephants Foot Consulting (Appendix 29 and 28 respectively).

Construction and Demolition

The CDWMP outlines comprehensive strategies to reduce, reuse, recycle, and responsibly dispose of waste, targeting a minimum 80% diversion from landfill. This aligns with the NSW Waste Avoidance and Resource Recovery (WARR) Strategy and the Ku-ring-gai Development Control Plan 2024.

The plan addresses all key project stages, including:

- Demolition, with an estimated waste volume of approximately 29,392.6 tonnes
- Construction, generating an estimated 1,426.4 tonnes of waste

Waste materials will be sorted and either managed on-site or transported to licensed recycling or disposal facilities using certified waste contractors. All waste handling will prioritise source separation, with materials such as bricks, concrete, timber, and plasterboard identified for reuse and recycling wherever feasible.

Hazardous waste, including asbestos, will be managed in strict accordance with EPA and WorkCover NSW regulations. An immediate work stoppage protocol will be enacted upon identification of any suspected hazardous material.

The CDWMP includes:

- detailed estimates of waste volumes by material type
- projected reuse and recycling rates
- clear assignment of roles and responsibilities across stakeholders
- monitoring and reporting procedures to track waste management performance
- site-specific opportunities for material reuse and recycling
- requirements for safe and compliant waste storage, signage, and collection servicing

Waste storage areas will be secure and conveniently located, with waste types segregated into clearly marked skip bins. The plan identifies the primary bin storage area at the site entrance, with flexibility to relocate as construction progresses.

These measures aim to ensure environmentally responsible waste practices throughout the project lifecycle while maintaining compliance with all relevant statutory and local planning requirements.

Operational

The OWMP provides a detailed strategy addressing all aspects of waste generation, handling, storage, and collection for the proposed development. It encompasses waste

streams, bin sizes and quantities, disposal procedures, room sizing, equipment recommendations, and collection logistics, in alignment with the Ku-ring-gai Development Control Plan 2024 and relevant NSW guidelines.

Building/ Core	# Units	General Waste Generation Rate (L/unit/week)	Generated General Waste (L/week)	FOGO Waste Generation Rate (L/unit/week)	Generated FOGO Waste (L/week)
A	35	120	4200	25	875
B	39	120	4680	25	975
TOTAL	74		8880		1850
Bins & Collections		General Waste Bin Size (L)	660	FOGO Waste Bin Size (L)	240
		General Waste Collections per Week	1	FOGO Waste Collections per Week	1
		Total General Waste Bins Required	15	Total FOGO Waste Bins Required	9
Bins per Building/ Core		Building/ Core	# Bins	Building/ Core	# Bins
		A	7	A	4
		B	8	B	5

Figure 45: Estimated Waste and FOGO Volumes (Source: Elephants Foot)

Building/ Core	# Units	Comingled Recycling Generation Rate (L/unit/week)	Generated Comingled Recycling (L/week)	Paper/ Cardboard Recycling Generation Rate (L/unit/week)	Generated Paper/Cardboard Recycling (L/week)
A	35	60	2100	60	2100
B	39	60	2340	60	2340
TOTAL	74		4440		4440
Bins & Collections		Comingled Recycling Bin Size (L)	240	Paper/ Cardboard Recycling Bin Size (L)	660
		Comingled Recycling Collections per Week	1	Paper/ Cardboard Recycling Collections per Week	1
		Total Comingled Recycling Bins Required	19	Total Paper/ Cardboard Recycling Bins Required	8
Bins per Building/ Core		Building/ Core	# Bins	Building/ Core	# Bins
		A	9	A	4
		B	10	B	4

Figure 46: Estimated Recycling Volumes (Source: Elephants Foot)

To ensure effective waste handling and compliance with relevant regulations, a range of mitigation measures will be implemented.

During the operational phase, separate waste streams will be clearly defined and managed, including general waste, comingled recycling, food and garden organics (FOGO), paper/cardboard, bulky waste, electronic waste, and sanitary waste. Source separation will be supported by resident education, clear signage, and in-unit waste storage facilities. Each dwelling will be equipped to facilitate separation of recyclable and organic materials at the source.

Bin rooms will be securely located in the basement and sized to accommodate projected waste volumes, with dedicated spaces for FOGO bins, bulky waste, and temporary holding. Chute discharge rooms, bin cupboards, and holding areas are sized in accordance with best practice design guidelines.

Pollution prevention measures include securing all bins to prevent overfilling, spillage, and illegal dumping. Waste contractors will be responsible for promptly addressing any spillage and maintaining collection hygiene. Collection will occur via a loading bay accessed from Cowan Road, with access designed for 6.0m rigid vehicles, consistent with NSW EPA and Australian Standards for turning radii and vehicle manoeuvrability.

Our assessment concludes that the proposed waste strategies within the CDWMP and OWMP are suitable to address waste generated during the demolition, construction and operational phases of the development.

6.13 Sustainability

An Ecologically Sustainable Development (ESD) report has been prepared by E-Lab Consulting (Appendix 15).

The key overarching sustainability principles are aligned with the definition of Ecologically Sustainable Development as defined in clause 7(4) of Schedule 2 of the EP&A Regulation.

The report sets out the ESD initiatives and commitments for the site. The proposed strategies include:

- Compliance with BASIX energy, water and thermal comfort targets as follows:
 - 60% energy
 - 40% water
 - Individual apartment NatHERS rating no less than 6 Stars
 - Average apartment NatHERS rating of at least 7 Stars, with the development expected to achieve an average of 7.6 Stars
- A range of sustainability initiatives across the site spanning energy efficiency, thermal performance, indoor environment quality, waste management and comfort.

In addition, the development will provide easy access to bus stops, including stop 2075112 at the St Ives Community Hall on Memorial Avenue a short walk away. The development will provide EV ready parking bays to support the future instalment of EV charging points.

Individual storage rooms will be provided for each resident to safely store a bicycle.

The site's location in close proximity to amenities such as supermarkets, dining and café options, banking, newsagents, post office, medical centres, chemists and parks and green spaces will significantly reduce reliance on private vehicles.

Our assessment concludes that the strategies and initiatives presented in the ESD report demonstrate a strong commitment to sustainability which meet and exceed expectations for the proposal.

6.14 Hazards and risk

The site is not subject to any hazards that would impact on development for a residential flat building and ongoing use for residential purposes.

6.15 Heritage

There is no built heritage on the site, or in proximity to the site. As such, it is considered that there are no potential direct or indirect impacts on built heritage. Therefore, an assessment against built heritage was not considered necessary for the purpose of this application.

6.15.1 Aboriginal Cultural Heritage

An Aboriginal Due Diligence Assessment has been prepared by EcoLogical to address any potential Aboriginal cultural heritage relating to the site (Appendix 7).

The Due Diligence Assessment found that no Aboriginal objects are present within the site, nor are there likely to be any. As such, the proposed works are unlikely to result in any impacts to Aboriginal cultural heritage, and an Aboriginal Cultural Heritage Assessment Report (ACHAR) is not required to be prepared.

The due diligence report sets out general measures to be implemented on site. In the unlikely event that suspected Aboriginal objects or human remains are located during future works, all works must cease and Heritage NSW or the NSW Police should be contacted for further appropriate investigation.

Following the implementation of the above mitigation measures (Appendix 2), our assessment concludes that the proposed development is acceptable with regard to potential impacts on Aboriginal cultural heritage.

6.16 Accessibility

An Access Design Review report has been prepared by Jensen Hughes (Appendix 25).

The report has reviewed the proposal against current requirements for access and mobility including against the following:

- Objects of the Disability Discrimination Act (DDA) 1992
- Disability (Access to Premises – Buildings) Standards 2010
- National Construction Code (BCA) - Building Code of Australia (BCA) 2022 Amendment 2 – Volume One and referenced Australian Standards including:
 - AS1428.1 2021 Part 1: General Requirements for access – new building work
 - AS1428.2 1992 Part 2: Enhanced and additional requirements – Buildings and facilities
 - AS1428.4.1 2009 Part 4.1: Means to assist the orientation of people with vision impairment – Tactile Ground Surface Indicators (TGSIs)
 - AS2890.6 2009 Part 6: Off-street parking for people with disabilities
 - AS1735.12 1999 Lift facilities for people with disabilities
 - AS 4299 – Adaptable Housing

The Access Design Review report concludes that the proposed development is suitable subject to implementation of mitigation measures (Appendix 2) requiring compliance with silver level Livable Housing Australia (LHA) requirements, adaptable housing standard AS4299 requirements and BCA clauses and Australian Standards as referenced in the report.

As such, our assessment concludes that the proposed development is able to meet the prescribed requirements for access and mobility.

7 Project justification

The section provides a justification for the proposed development with consideration of market demands and the economic benefits that may be gained if the proposed development was to proceed. This section also provides an analysis of the proposed development with regard to strategic planning framework and an analysis of the proposal with regard to economic, environmental and social impacts, and principles of ESD.

It assesses the potential benefits and impacts of the proposed development, taking into consideration the findings in the detailed assessments, stakeholder views and compliance with the relevant controls and policies.

7.1 Design justification

The proposal is structured around the concepts of affordability, amenity, sustainability and accessibility.

Key design rationale for the development includes:

- Provision of 74 apartments, including 12 affordable housing units, contributing to affordability and diversity in the area
- The exceedance of the building height above the bonus height control is minimal and impacts of the exceedance will be imperceptible
- The proposed apartments have been assessed as meeting the objectives of the Apartment Design Guidelines
- Extensive areas of communal open space (1,228m², 35% of the site area) are provided at ground level and Level 7
- The proposed configuration enables the building to maximise residential amenity through solar access and natural cross ventilation
- Extensive landscaping featuring new planting and landscaping along the site's boundaries and communal open space areas as well as retention of mature trees and vegetation on site, complementing the proposed built form
- Stepped built form and heights to minimise the impacts on sensitive receptors in the surrounding area
- The proposed development aligns with the low-mid rise housing policy by placing a high-quality, high density residential use within close proximity to St Ives Shopping Village and bus services.

7.2 Strategic justification

As demonstrated in Section 2 and Appendix 3, the proposed development meets the objectives and directions outlined in the relevant strategic policy for the site, locality and broader region. In particular, the proposed development meets the objectives of the:

- *Greater Sydney Region Plan* - The proposed development satisfies the 4 key themes of the region plan, including Infrastructure and Collaboration, Liveability, Productivity and Sustainability
- *North District Plan* - The proposed development satisfies a number of planning priorities, particularly in relation to facilitating diverse housing and planning for a city supported by infrastructure in the North District.
- *Ku-ring-gai Local Strategic Planning Statement* - The proposed development is consistent with the objectives of the LSPS, specifically by facilitating an inclusive, healthy, safe and socially connected community and providing diverse and affordable housing in an accessible location.
- *Ku-ring-gai Affordable Housing Policy* - The proposed development is consistent with this Policy by addressing the current housing shortfall by delivering well-located, diverse, and sustainable market residential and affordable housing.
- *National Housing Accord* - The proposed development supports the National Housing Accord by contributing to the goal of constructing 1.2 million homes in existing urban locations that are highly accessible.

In summary, the proposed development is consistent with the above strategic plans as:

- It is consistent with the long-standing State level strategic planning objective to facilitate the provision of affordable homes in existing built-up urban areas.
- It will utilise the provisions of the Housing SEPP to increase housing supply and diversity and makes best use of the currently underutilised site, upzoned with the low and mid rise and infill affordable housing provisions.
- It aligns with Ku-ring-gai's strategic planning context by concentrating growth in a location close to existing social infrastructure and community facilities, parks, and public transport that is consistent with the area's planned transition to higher density living in designated urban centres.

As such, it is considered that the proposed development aligns with the relevant strategic planning for the Ku-ring-gai LGA.

7.3 Statutory justification

As outlined in both Section 4 and at Appendix 4, the proposed development aligns with all relevant statutory instruments which guide the development of the land. The proposed development utilises the provisions of the Housing SEPP to appropriately locate in-fill affordable housing.

It is noted the Housing SEPP permits the residential flat building at the site. The proposed development will utilise the height and FSR provisions and the available in-fill affordable housing bonuses from the Housing SEPP.

7.4 Social, economic and environmental justification

A summary of the social, economic and environmental justification is provided in the sections below. It is considered that the combination of each of these aspects justifies the need for the proposed development at the site.

7.4.1 Social

The proposal will deliver 74 new apartments, including 12 affordable housing units, providing a mix of sizes to support housing diversity and meet a range of community needs. The site is strategically located within close proximity to the St Ives Shopping Village and is well-serviced by public transport, particularly frequent bus routes. It also benefits from convenient access to local amenities, including open space and recreational facilities. The proposal represents an efficient use of a well-located urban site and aligns with broader planning objectives to increase housing supply and affordability in accessible, service-rich areas.

Furthermore, the proposed development would provide significant social benefits, including:

- provision of much needed housing supply in an accessible location and close to existing amenities
- increased supply of affordable housing in the locality for very low, low and moderate income households, including access to housing for key workers
- contributes to achievement of strategic planning objectives by providing additional housing and housing diversity within the Ku-ring-gai LGA
- positive transformation of the community, by replacing older, low density housing stock with modern, higher density, energy efficient residential development
- provision for a variety of unit types to accommodate people who require increased accessibility
- employment opportunities during construction
- increased economic activity from additional residents in the area, supporting local businesses and service providers
- adoption of ecologically sustainable design elements.

While there are some potential construction impacts as a result of the proposal, these will be temporary, are manageable and will be mitigated through appropriate measures. The development is considered well-suited to the site and consistent with the anticipated future character of the locality. It is therefore considered to warrant approval, subject to the implementation of mitigation measures outlined in Appendix 2, which address potential impacts relating to noise, dust, vibration, waste management, traffic, and access.

Overall, the proposed development is expected to deliver significant positive social benefits, including provision of housing supply and helping to achieve strategic planning objectives for the St Ives locality.

7.4.2 Economic

The proposed development involves a significant capital investment of \$91,543,000 in construction and associated costs.

The financial investment will facilitate the future development of 74 new dwellings (62 market residential units and 12 affordable housing units) providing approximately 9,917.6 m² of residential floor space.

The future increase in population as a result of the proposed development will contribute positively to the economic function of the locality, specifically the neighbouring retail premises at the St Ives Shopping Village. In addition, workers on site during construction will provide a positive economic contribution to the Shopping Village.

7.4.3 Environmental

Under the National Strategy for Ecologically Sustainable Development (1992), ESD is defined as, 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased.'

The EP&A Act utilises the definition of ESD from Part 3, Clause 6(2) of the *Protection of the Environment Administration Act 1991*, wherein ESD can be achieved through the implementation of a set of principles and programs.

The proposed development has been assessed under these principles in the below sections and additionally, under the accompanying Ecologically Sustainable Development Report at Appendix 15, also addressed in Section 6.13.

The precautionary principle

The precautionary principle states that if there are threats of serious or irreversible environmental damage, the lack of full scientific certainty should not be used as a reason for postponing measures to prevent said damage.

Detailed investigations relating to geological, environmental, engineering and ecological aspects of the proposed development have been undertaken with the aim to produce optimal project design and layout. The development of the site as outlined in this EIS and supporting technical assessments, provides the current optimised development, which takes into consideration all physical, environmental, social, cultural heritage and economic aspects which are required to be addressed.

The information supporting this development demonstrates that there is sufficient certainty of the environmental impacts associated with the development and that these impacts are acceptable and can be mitigated.

Inter-generational equity

Inter-generational equity refers to the principle that the current generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations.

The proposed development has been assessed and mitigation measures are recommended at Appendix 2 of this report. It is considered the principle of inter-generational equity is achieved as potential environmental impacts of the development will be avoided, minimised or mitigated.

Conservation of biological diversity and maintenance of ecological values

The third principle of ESD states that the conservation of biological diversity and ecological integrity should be a fundamental consideration in development applications.

The potential environmental impacts of the proposed development have been detailed throughout this EIS, with mitigation measures described.

The proposed development has been the subject of an ecological assessment as detailed in Section 6.9. Additionally, a BDAR Waiver (Appendix 9) issued by DPHI confirms that the proposed development is not likely to have significant impacts on biodiversity values and that a BDAR is not required as a result.

The proposal will not have any significant adverse impacts in terms of biological diversity and ecological values.

Appendix 1: Secretary's environmental assessment requirements table

This EIS has been prepared in line with the Secretary's environmental assessment requirements (SEARs) issued by the Department of Planning, Housing and Infrastructure on 25 July 2025 and in line with Part 8, Division 2, Section 173 of the *Environmental Planning and Assessment Regulation 2021*.

The SEARs and where they are addressed in this EIS are set out in the table below.

Environmental assessment requirement	EIS reference	Supporting documentation
General requirements		
The EIS must be prepared in line with and meet the minimum requirements of section 192 of the Environmental Planning and Assessment Regulation 2021.	All	Environmental Impact Statement
Key issues		
Statutory context, including: - Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies, guidelines and planning circulars. - Identify compliance with applicable development standards and provide a detailed justification for any non-compliances. - Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences. - Address the requirements of any approvals applying to the site, including any concept approval, any endorsed or draft master plan, precinct plan or any recommendation from Gateway determination. - Provide an accurate summary of the detailed assessment of the impacts of the project and integrate the findings and recommendations of technical reports into the justification and evaluation of the project as a whole.	Summary Section 3.2.5 Uses and activities Section 4 Section 6.1.1 Bulk and scale	- Appendix 4 Statutory compliance tables - Appendix 6 Clause 4.6 Variation Request - Appendix 10 Community Housing Provider letter

Environmental assessment requirement	EIS reference	Supporting documentation
If affordable housing is being proposed, provide the name and ABN of the registered community housing provider that will be responsible for managing the affordable housing component, along with documentation confirming the provider's agreement to this responsibility.		
Estimated Development Cost and Employment, including: - Provide the estimated development cost (EDC) of the development prepared in accordance with the relevant planning circular using the Standard Form of EDC Report. - As applicable, the EDC Report must separately specify the EDC of: - the residential component of the development. - the tenant component of the built-to-rent development. - the seniors housing component of the development.	Section 1	Appendix 8 EDC Report
Contributions and Public Benefit, including: - Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind agreement. and include details of any proposal for further material public benefit. - Where a voluntary planning agreement is proposed, prepare a draft planning agreement in accordance with the Planning agreements – Practice note- February 2021.	Section 4.3	
Engagement, including: Demonstrate that engagement and consultation activities have been undertaken in accordance with the Undertaking Engagement Guidelines for State Significant Projects and identify how issues raised, and feedback received have been considered in the design of the project.	Section 5	Addressed in EIS

Environmental assessment requirement	EIS reference	Supporting documentation
○ If the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation must be consulted.		
Design Quality, including: • Demonstrate how the development will achieve: ○ design excellence in accordance with any applicable EPI provisions. ○ good design in accordance with the seven objectives for good design in Better Placed. • Demonstrate that the development: ○ where required by an EPI or concept approval, or where proposed, has been subject to a competitive design process, carried out in accordance with an endorsed brief and Design Excellence Strategy; or ○ in all other instances, has been reviewed by the State Design Review Panel (SDRP) where required under the NSW SDRP: Guidelines for Project Teams. • Recommendations of the jury and Design Integrity Panel (where a competitive design process has been held) or the SDRP are to be addressed prior to lodgement.	Section 3.2.4	• Appendix 19 Design Report
Built Form and Urban Design, including: • Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. Where relevant explain and illustrate the application of any bonuses under an EPI.	Section 6.1	• Appendix 5 Architectural Drawings • Appendix 19 Design Report • Appendix 21 ADG compliance table • Appendix 18 Survey Plan

Environmental assessment requirement	EIS reference	Supporting documentation
- If relevant, provide an assessment of the development against: - the design principles for seniors housing set out in Schedule 8 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) and the Seniors Housing Design Guide. - the design principles for residential apartment development set out in Schedule 9 of the Housing SEPP and the Apartment Design Guide (ADG). This should include a table which demonstrates how each dwelling (including affordable dwellings) performs against the ADG design criteria. - If affordable housing is proposed, provide a floorplan outlining the gross floor area and dwellings that are provided as affordable housing.		
Environmental Amenity, including: - Assess amenity impacts on the surrounding locality, including solar access, visual privacy, view loss and view sharing, as well as wind, lighting and reflectivity impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated. - Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during winter solstice) at hourly intervals between 9am and 3pm, comparing the proposed development, existing situation and where applicable, a development with no bonuses applied.	Section 6	- Appendix 19 Design Report - Appendix 31 Pedestrian Wind Assessment
Visual Impact, including: Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.	Section 6.3	Addressed in EIS

Environmental assessment requirement	EIS reference	Supporting documentation
If the proposal would result in significant visual impact not anticipated by the planning controls, provide a visual impact assessment that addresses the visual impacts of the development on the existing catchment.		
Transport, including: - Provide a Transport Impact Assessment (TIA) in accordance with the processes and methodology recommended in the Guide to Transport Impact Assessment (GITA) published by TfNSW. - If the construction of the development would cause interruptions to regular pedestrian and transport routes (including public transport, active transport or general traffic), a preliminary Construction Traffic (or Transport) Management Plan (CTMP) should be prepared as part of the TIA to mitigate any such impacts.	Section 6.7	Appendix 27 Transport Impact Assessment including Preliminary Construction Traffic Management Plan
Noise and Vibration, including: Provide a noise and vibration impact assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	Section 6.8	Appendix 26 Noise and Vibration Impact Assessment
Water Management, including: - Detail the proposed drainage design and servicing infrastructure to be incorporated as part of the development (stormwater and wastewater). - Demonstrate how the development complies with council's drainage requirements and identify proposed stormwater treatment and water quality management measures to minimise adverse environmental impacts.	Section 6.5	Appendix 22 Integrated Water Management Plan
Ground and Groundwater Conditions, including:	Section 6.5.1	Appendix 12 Geotechnical Assessment

Environmental assessment requirement	EIS reference	Supporting documentation
- Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site and including soil erosion. - Where required provide a Dewatering Management Plan in accordance with relevant Groundwater Guidelines. If the proposed development is on land identified as having high salinity or acid sulfate soil potential in an EPI provide a Salinity Management Plan or Acid Sulfate Soil Management Plan that includes appropriate management measures and strategies.		
Contamination and Remediation, including: In accordance with Chapter 4 of the State Environmental Planning Policy (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development.	Section 6.6	Appendix 14 Preliminary Site Investigation
Trees and Landscaping, including: - Provide a landscape plan, that: - details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area). - provides evidence that opportunities to retain significant trees have been explored and/or inform the plan. - If the proposal involves impacts to trees, provide an Arboricultural Impact assessment that assesses the number, location, condition and significance of trees to be removed and retained including: - any existing canopy coverage to be retained on-site. - tree root mapping. if the proposal involves significant impacts to tree protection zones of retained trees identified as being significant	Section 6.4	- Appendix 17 Landscape Report - Appendix 32 Arboricultural Impact Assessment

Environmental assessment requirement	EIS reference	Supporting documentation
Ecologically Sustainable Development (ESD), including: - Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. - Where relevant, provide an assessment of the development against the standards for non-residential development set out in Chapter 3 of State Environmental Planning Policy (Sustainable Buildings) 2022.	Section 6.13	- Appendix 15 ESD Report - Appendix 23 BASIX Certificate
Biodiversity, including: - Unless a waiver has been granted, provide a Biodiversity Development Assessment Report (BDAR) that assesses any biodiversity impacts associated with the development in accordance with the Biodiversity Conservation Act 2016 and the Biodiversity Assessment Method 2020. - OR - If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	Section 6.9	Appendix 9 BDAR waiver
Waste Management, including: - Provide the measures to be implemented to manage, reuse, recycle and safely dispose of waste, including in accordance with any council waste management requirements. - Identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site.	Section 6.12	- Appendix 28 Operational Waste Management Plan - Appendix 29 Construction and Demolition Waste Management Plan
Social Impact, including:	Section 6.10	Addressed in EIS

Environmental assessment requirement	EIS reference	Supporting documentation
The EIS must consider social impacts and, should any significant social impacts be identified, a Social Impact Assessment must be prepared in accordance with the Social Impact Assessment Guideline for State Significant Projects.		
Flood Risk, including: - Identify the flood planning area and level as set out in the relevant EPI and other supporting documents to determine; - The flood extent and velocity up to the Probable Maximum Flood and risk on-site having regard to adopted flood studies and, floodplain risk management studies and plans - The site access and egress routes - the potential effects of climate change, - any relevant provisions of the NSW Flood Risk Management Manual, and any other relevant guidelines - Where the development is occurring on flood prone land a flood impact and risk assessment (FIRA) must be prepared having regard to the Flood Impact and Risk Assessment – Flood Risk Management Guide LU01. When determining the scope and category of the FIRA the requirements outlined in the FIRA guide must be considered. - Detail any flood risk management measures that are to be incorporated as part of the development having regard to relevant guidelines (including any design solutions, flood modification measures, property modification measures, operational procedures or Flood Emergency Response Plan).	N/A	Site not identified as flood prone
Bush Fire Risk, including:	N/A	Site not identified as bushfire prone

Environmental assessment requirement	EIS reference	Supporting documentation
If the development is on mapped bush fire prone land, or a bush/grass fire threat is identified on or adjoining the site, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection.		
Aboriginal Cultural Heritage, including: - Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by: - Identifying that an appropriate prior planning process has already considered these impacts, e.g. a rezoning or development application, or - Providing an initial assessment of the potential impacts. - If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which: - Identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site. - Is prepared in accordance with relevant guidelines.	Section 6.15.1	Appendix 7 Desktop Aboriginal Due Diligence Assessment
Environmental Heritage, including: Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines.	Section 6.15	N/A
Public Space, including: If public space is proposed as part of the development, demonstrate how the development:	N/A	N/A

Environmental assessment requirement	EIS reference	Supporting documentation
○ maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department. ○ provides accessible public space. ○ maximises permeability and connectivity. ○ maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection. ○ maximises street activation. ○ minimises potential vehicle, bicycle and pedestrian conflicts.		
Hazards and Risks, including: • If the development is affected by above ground dangerous goods storages from the surrounding developments and/or underground high-pressure dangerous goods pipelines in the vicinity of proposal location: ○ Report on any consultation outcomes with operators. ○ Consider whether the development would cause these storages non compliance with Australian Standards. • Where applicable, provide a Hazard Analysis in line with relevant guidelines and planning circular.	Section 6.14	• N/A

Appendix 2: Mitigation measures table

Potential Impact	Approach	EIS Ref.
Noise	• Selection of the quietest plant/activity available (or retrofit acoustic treatment to the plant such as residential class mufflers) to minimise any NML exceedances • If any residual exceedances, investigate the use of additional barriers to screen the affected receivers. It is noted that solid hoarding are proposed along the whole perimeter of the site • If any remaining residual significant exceedance, investigate time restrictions (e.g. avoiding loud early morning works at the residences) and notification of affected receivers when works likely to exceed the NML's is likely to occur • Façade complying construction presented in Section 8.2 is to be adopted during the design stage • During construction stage, acoustic barriers (e.g. plywood hoarding) with minimum height of 1.8m to be installed to the northwest of the site along Cowan Road to provide noise attenuation	Section 6.8 Appendix 26
Contamination	• DSI recommended to be undertaken during design development phase to provide further confirmation of the presence and extent of contamination on site prior to construction	Section 6.6 Appendix 14
Aboriginal Cultural Heritage	• Recommendations – General Measures • Aboriginal objects are protected under the NPW Act regardless of whether they are registers on AHIMS or not. If suspected Aboriginal objects, such as stone artefacts or culturally modified trees, are located during future works, works must cease in the affected area and an archaeologist called in to assess the finds. If the finds are found to be Aboriginal object, Heritage NSW must be notified under section 89A of the NPW Act. Appropriate management and avoidance or approval under a section 90 AHIP should then be sought if Aboriginal objects are to be moved or harmed.	Section 6.15 Appendix 7

Potential Impact	Approach	EIS Ref.
	In the extremely unlikely event that human remains are found, works should immediately cease, and the NSW Police should be contacted. If the remains are suspected to be Aboriginal, Heritage NSW may also be contacted at this time to assist in determining appropriate management	
Geotechnical	- Dilapidation surveys of adjacent properties and infrastructure - Preparation of a geotechnical monitoring plan (GMP) to satisfy RMS requirements - Inclinometer installation and monitoring during construction to satisfy RMS/Rail Corp - Requirements (RMS to confirm if this is required) - Temporary working platform assessment - Footing and shoring pile inspections during construction	Section 6.5 Appendix 12
Traffic	Access/Driveway - The first 6m of the driveway for 5% should be amended to provide a maximum gradient of 5% in accordance with AS 2890.1 criteria during the detailed design stage Visitor Parking - Proposal provides for 10 visitor parking spaces (Short of the DCP minimum 19) the report considers this sufficient given location to St Ives Shopping Village and linked trip behavior Bicycle Parking - Provide 74 resident and 8 visitor spaces to meet DCP requirements Construction Traffic Management - Truck movements to use State and Regional roads to minimise local impacts - No queueing of heavy vehicles on surrounding streets unless approved by Council/TfNSW - All materials to be loaded/unloaded and stored within the site boundary	Section 6.7 Appendix 27

Potential Impact	Approach	EIS Ref.
	- Construction workers encouraged to use public transport or carpool; on-site tool drop-off/storage provided - Temporary fencing along site perimeter; trucks escorted under supervision of on-site personnel to ensure pedestrian safety - Notification letters to neighboring properties at least 14 days before works commence. - Contractor responsible for ensuring road pavement, kerbs, gutter and footpath remain in clean/serviceable state at no cost to Council.	
Pedestrian Wind Environment	- Inclusion of densely foliating vegetation or a wind screen with a height of at least 1.5m along the perimeter of Level & Communal terrace and inclusion of the central planters within the terraces - Inclusion of 1.8m tall 50% porous screens along the shorter aspects of corner terraces on Level 8	Section 6.11 Appendix 31
Access	- Compliance with Silver Level LHA requirements - Compliance with adaptable housing standard AS4299 requirements - Compliance with the BCA clauses and Australian Standards reference in Section 6.1.1 of the Access Design Review (Appendix 25)	Section 6.16 Appendix 25
ESD	Heat Island effect To mitigate the Urban Heat Island effect (UHI) the development has incorporated the following: 1,306m² of Landscaped area - Extensive tree canopy cover on ground level - Light colored roof and pavement for trafficable areas	Section 6.13 Appendix 15
Construction Noise and Vibration	Noise - These include installation of 1.8m high acoustic barriers along Cowan Road, - use of quieter equipment where feasible, strategic scheduling of high-noise works, and	Section 6.8 Appendix 26

Potential Impact	Approach	EIS Ref.
	- proactive community engagement and notification Vibration - A comprehensive noise and vibration management approach will be implemented and will include regular monitoring, - complaint handling procedures, - acoustic treatments, and - detailed notification plans. - Construction noise control measures will involve use of alternative, lower-noise equipment, acoustic barriers, silencing devices, and modifications to site work practices.	
Groundwater	- Prepare a soil and water management plan and incorporate in the CEMP. Install sediment and erosion control measures in accordance with the Blue Book (DECC, 2008). - Prepare water quality monitoring plan and incorporate in the CEMP - Storage of hazardous goods and refuelling activities to take place in bunded areas. Implement water quality monitoring program - Prepare water quality monitoring plan and incorporate in the construction environment management plan - Minimise excavations below groundwater table - Minimise duration of time that excavations below the water table are open - By design, the secant piles should be effective in preventing groundwater ingress - A Construction Soils and Water Management Plan (CSWMP) would be developed as a sub plan of the Construction Environmental Management Plan (CEMP), install sediment and erosion control measures	

Potential Impact	Approach	EIS Ref.
	• Develop detailed risk assessments and management plans tailored to the specific site conditions. These plans should outline procedures for safely handling contaminated soil, including protocols for excavation, transport, and disposal, restrict access to contaminated areas and use barriers to prevent unauthorised entry • Where practical and space allows, adopt WSUD guidelines for drainage infrastructure (appropriate plant species selection, etc). Adopt adequate erosion and scour protection measures in the drainage design • Install impermeable liners or redesign to shallower depth stormwater basins where they may intercept groundwater	

Appendix 3: Strategic planning assessment

Greater Sydney Region Plan..... 104

North District Plan 105

Ku-ring-gai Local Strategic Planning Statement 106

Ku-ring-gai Community Strategic Plan 2032 107

Ku-ring-gai Housing Strategy 108

Ku-ring-gai Affordable Housing Policy 108

National Housing Accord 108

Future Transport Strategy 2056 109

Greater Sydney Region Plan

The Greater Sydney Region Plan (Region Plan) outlines how Greater Sydney will manage growth and change in the context of social, economic and environmental matters. It sets the vision and strategy for Greater Sydney, to be implemented at a local level through District Plans.

The overriding vision for Greater Sydney in the Region Plan is to rebalance Sydney into a metropolis of three unique, but connected cities including:

- the established Eastern Harbour City
- the developing Central River City
- the emerging Western Parkland City

Historically, Greater Sydney's jobs and transport have been focused in the east, requiring many people to make long journeys to and from work and other services. The 3 cities vision allows opportunities and resources to be shared more equitably while enhancing the local character we value in our communities. By integrating land use, transport links and infrastructure across the three cities, more people will have access within 30 minutes to jobs, schools, hospitals and services.

The Region Plan provides broad priorities and actions, which focus on the following 4 key themes:

- Infrastructure and collaboration
- Liveability
- Productivity
- Sustainability

There are a number of directions and objectives that are of particular relevance to the proposed development which are addressed below:

Directions	Objectives
A city supported by infrastructure	• The proposed development strongly aligns with this direction by providing: ○ New residential floor space in a location that can utilise existing social and other infrastructure. ○ New housing adjacent to St Ives Shopping Village encouraging walkable neighbourhoods.
A collaborative City	• The proposed development strongly aligns with this direction as follows: ○ Provide housing in close proximity to St Ives Village Centre that encourages walkable neighbourhoods.
Housing in the City	• The proposed development strongly aligns with this direction as follows:

Directions	Objectives
	○ Provides high-density market residential and affordable homes. ○ Provides increased housing density. ○ Satisfies the criteria for 'urban renewal' given its location close to St Ives Shopping Village.
A City of great places	• The proposed development strongly aligns with this direction as it: ○ Contributes to and complements the St Ives precinct. ○ Provides opportunities for social connection in walkable, human scale, fine grain neighbourhoods.
A well-connected City	• The proposed development strongly aligns with this direction as follows: ○ The site is directly adjacent to St Ives Shopping Village and bus routes along Mona Vale Road and Killeaton Street. ○ The site contributes to the gradual intensification of the locality.
Jobs and skills for the City	• The proposed development aligns with this objective by providing employment though jobs during the construction phase.
A City in its landscape	• This SSD application strongly aligns with this direction as it: ○ Provides for an appropriate development within an urban area. ○ Provides 16.6% deep soil areas on site. ○ Provides suitable landscaping on the site.

North District Plan

The Greater Sydney District Plan (District Plan) was prepared by the former Greater Sydney Commission in March 2018. It seeks to manage growth in the context of economic, social and environmental matters in the Ku-ring-gai LGA. It provides the district level framework to implement the goals and directions outlined in the Region Plan.

In particular, the proposed development will address the following planning priorities:

Planning priority	Explanation
<i>Infrastructure and Collaboration (N1)</i>	• The proximity to existing bus stops on Killeaton Street and Mona Vale Road, and Shopping Village in St Ives can support the increased density of the site.

Planning priority	Explanation
<i>Liveability (N5 and N6)</i>	The location of the residential flat building is located approximately 550 metres from bus stops on Killeaton Street and 220-metres from bus stops on Mona Vale Road with bus routes available from the site to Mona Vale, Gordon, and the Northern Suburbs. This will enable access to jobs in neighbouring town centres and commercial activity within 30-minutes of travel. The proposed unit mix and affordable housing will ensure diversity and affordability for future residents within St Ives with excellent access to nearby social infrastructure.
<i>Productivity (N12)</i>	- The proposed development seeks to provide housing directly adjacent to St Ives Village Centre which contains a number of services. The proposed development is also located approximately 600-metres from bus stops on Killeaton Street and 250-metres from bus stops on Mona Vale Road with bus connections from the site to the Northern Suburbs. - The proposed development will support the 30-minute city strategic direction.
<i>Sustainability (N16, N17 and N19)</i>	The proposed landscape plans ensure that existing vegetation is maintained as best as possible at the site to maintain the existing character of the area. Selected plant species also ensure cohesion with the existing landscaped character and the utilisation of endemic species.

Ku-ring-gai Local Strategic Planning Statement

The Ku-ring-gai Local Strategic Planning Statement (LSPS) outlines the vision and strategic direction for land use planning in the Ku-ring-gai LGA from 2016 to 2036. It integrates the priorities and actions from existing land use plans and policies to present an overall land use vision for the area. The LSPS provides guidance on various aspects, including:

- Location of Future Housing: Identifying areas suitable for increased housing density.
- Future Identity and Character of Local Centres: Planning for the development and character of local centres, including St Ives.
- Future Transport Infrastructure: Planning for transport infrastructure to support growth.

There are a number of planning priorities that are of particular relevance to the Proposed development which are addressed below:

Planning Priority	Comment
<i>K3. Providing housing close to transport, services and facilities to meet the existing and future requirements of a growing and changing community.</i>	The proposed development supports this priority by providing a total of 74 new homes in a residential flat building that is adjacent to St Ives Shopping Village and bus stops/routes.
<i>K4. Providing a range of diverse housing to accommodate the changing structure of families and households and enable ageing in place.</i>	The proposed development of 12 affordable homes and 62 market residential homes provides a diverse range of new housing that will accommodate changing structures of families and households.
<i>K5. Providing affordable housing that retains and strengthens the local residential and business community</i>	The proposed development supports this planning priority by providing 12 affordable homes adjacent to St Ives Shopping Village.
<i>K21. Prioritising new development and housing in locations that enable 30-minute access to key strategic centres</i>	The proposed development supports this priority by providing new housing adjacent to social infrastructure and public transport services to key urban centres that supports the 30-minute city concept.

Ku-ring-gai Community Strategic Plan 2032

The Community Strategic Plan has a broader focus than the Local Strategic Planning Statement as it addresses long term social, environmental and economic goals for the community.

The Ku-ring-gai community strategic plan reflects long term objectives to address the environment, social, economic and civic leadership.

- The proposed development is consistent with many of the plan's key themes including:
 - Theme 1: Community, people and culture - the proposed development will provide housing choice in line with focus area (C2) housing choice. The proposed development will provide housing mix through market and affordable housing at the site, 16 two-bedroom and 58 three-bedroom units..
 - Theme 3: Places, spaces and infrastructure: The proposed development aligns with the focus area of (P4) of providing a broad range of shops and services and lively and shaded urban village spaces and places where people can live, work, shop, meet and spend leisure time. The proposed development is located beside St Ives Shopping Village which contains various shops and community services that will be readily available to future residents in the building.
 - Theme 4: Access, traffic and transport - Aligns with the focus area of (T3), an accessible public transport and regional road network, as the proposed development delivers homes within walking distance from bus stops along

Mona Vale Road and Killeaton Street. The bus stops are served by routes that connect the site with Mona Vale, Gordon, and the Northern Suburbs.

Ku-ring-gai Housing Strategy

The Ku-ring-gai Housing Strategy sets out the long-term plan for meeting housing demand in the Ku-ring-gai LGA to 2041. It responds to housing targets set by the NSW Government and supports the delivery of well-located, diverse, and sustainable housing options in alignment with broader metropolitan strategies, including the Greater Sydney Region Plan and the North District Plan.

The Strategy recognises that Ku-ring-gai will continue to experience population growth and demographic change, requiring a planned approach to increasing housing supply, particularly in areas with strong access to public transport, services, and infrastructure. It places an emphasis on accommodating this growth while preserving the unique environmental and heritage qualities of the area.

The proposed development in its location supports the housing strategy by providing a total of 74 new homes including 12 affordable homes that contributes to the housing diversity in the area and addresses the current housing shortfall.

Ku-ring-gai Affordable Housing Policy

The Ku-ring-gai Affordable Housing Policy (AHP) came into effect on 16th April 2025. The AHP outlines Ku-ring-gai Council's commitment to increasing the supply of affordable housing, particularly for key workers and individuals with lower to moderate incomes. The AHP sets specific targets for affordable housing and ensures a consistent and transparent process for receiving contributions from industry to achieve this goal. The AHP is fundamentally aimed at the provision of affordable housing through Council-led strategic planning or under proponent-led planning proposals.

Notwithstanding that the proposal does not involve a rezoning, the development aligns with the AHP by contributing to the Council's objectives of providing stable and secure homes for those in need. By incorporating a significant proportion (15% of the total GFA, which includes 12 apartments) of affordable housing, the development supports Council's aim to address housing affordability challenges within the Ku-ring-gai Local Government Area.

National Housing Accord

The Australian Government has agreed to a National Housing Accord, which is an aspirational target for all states and territories to build 1.2 million new well-located homes over 5 years from mid-2024.

As part of the Accord, the Commonwealth has committed \$350 million over 5-years from 2024-25 to support the delivery of 10,000 affordable homes. State and territory governments have agreed to build on this commitment to support delivery of up to an additional 10,000 affordable homes across Australia. Specifically, the State of New South Wales has agreed to build the highest amount of up to 3,100 new affordable homes.

The proposed development supports this commitment by delivering 12 new affordable homes in an existing built-up urban area.

Future Transport Strategy 2056

The Future Transport Strategy 2056 is a long-term plan by the NSW Government that sets out a vision for an integrated, accessible, and sustainable transport network across NSW. It prioritises high-density development near public transport hubs to support active and public transport use, reduce car dependence, and improve connectivity.

The proposed development aligns with this strategy by delivering higher-density housing within proximity to key transport corridors, including Mona Vale Road and Killeaton Street that is served by local bus services. This location supports the Strategy's goals by enhancing access to jobs, services, and amenities for residents.

Appendix 4: Statutory compliance tables

Environmental Planning and Assessment Act 1979	111
Environmental Planning and Assessment Regulation 2021	114
Biodiversity Conservation Act 2016	114
Contaminated Land Management Act 1997	115
Heritage Act 1977	115
State Environmental Planning Policy (Biodiversity and Conservation) 2021	115
State Environmental Planning Policy (Housing) 2021	116
State Environmental Planning Policy (Planning Systems) 2021	122
State Environmental Planning Policy (Resilience and Hazards) 2021	123
State Environmental Planning Policy (Sustainable Building) 2022	124
State Environmental Planning Policy (Transport and Infrastructure) 2021	124
Ku-ring-gai Local Environmental Plan 2015	125

Environmental Planning and Assessment Act 1979

Development under the Act must have regard to its objects as set out under Section 1.3. The proposed development is considered consistent with the objects of the Act, as outlined in the table below.

Consideration	Relevance	EIS ref
Section 1.3: Objects of the Act		
a. to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources	The proposal promotes the social and economic welfare of the community as it will contribute to housing supply and affordability, diversity in a well-located site beside existing social infrastructure public transport, and other services. It will specifically improve the vitality and viability of St Ives Shopping Village through increased footfall and support to the local economy through the construction phase.	EIS
b. to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment	This EIS provides information on the relevant economic, environmental and social impacts of the proposed development to enable the consent authority to undertake a thorough environmental assessment and assist in its decision-making on the application.	Section 6.13 and Appendix 15
c. to promote the orderly and economic use and development of land	The development promotes the orderly and economic use of the land by - Delivering residential accommodation in an accessible area - Provides superior built form outcomes in housing construction - It provides for the development of existing underutilized residential zoned land	Section 7
d. to promote the delivery and maintenance of affordable housing	The proposed development will provide 1,487.64 m ² sqm of affordable housing.	Section 3
e. to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats	A BDAR waiver is provided at Appendix 9, confirming that there are no impacts arising from development on habitats of any threatened species	Section 6.13 and Appendix 9

Consideration	Relevance	EIS ref
f. to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)	The proposed development is accompanied by an Aboriginal Due Diligence Assessment. This includes mitigation measures for proposed development.	Section 6.15 and Appendix 7
g. to promote good design and amenity of the built environment	The proposed development has been designed to promote design excellence and a high standard of amenity in the built environment.	Section 6.1 and Appendix 19
h. to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants	The development will be constructed in line with any conditions of approval issued by the consent authority and the relevant requirements that relate to health and safety, construction and maintenance.	N/A
i. to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State	This EIS is submitted to the Department of Planning, Housing and Infrastructure to enable an environmental assessment of the application. It is expected that this document will be referred by the Department to other NSW Government agencies for further assessment and comment.	N/A
j. to provide increased opportunity for community participation in environmental planning and assessment.	As part of Department of Planning, Housing and Infrastructure's assessment of the application, this EIS will made publicly available to the community, Council and any NSW Government agencies invited to provide a submission on the proposed development. Any submissions received will be addressed by the applicant.	Section 5
Section 4.12(8)		
A development application for State significant development or designated development is to be accompanied by an environmental impact statement prepared by or on behalf of the applicant in the form prescribed by the regulations.	This EIS has been prepared to accompany an SSD application and is in the form prescribed by the regulations.	N/A
Section 4.15		
a) the provisions of:		

Consideration	Relevance	EIS ref
i) any environmental planning instrument	The environmental planning instruments relevant to the site are addressed at Section 4 of this EIS and in this appendix.	Section 4 and Appendix 4
ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved)	There are no draft EPIs relevant to the site.	N/A
iii) any development control plan	DCPs are not applicable to SSD applications.	N/A
a. any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4	There is no planning agreement relevant to this proposal	N/A
iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	The Environmental Planning and Assessment Regulation 2021 is addressed at Section 4.	Section 4 and Appendix 4
v) Repealed	n/a	N/A
b) The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts the locality	The likely impacts of the development, including environmental impacts on the natural and built environments, social and economic impacts are addressed at Section 6.	Section 6
c) the suitability of the site for the development	The suitability of the site for the development is considered at Section 6.	Section 6
d) any submissions made in accordance with this Act or the regulations	Any submissions received on the application will be considered and addressed as part of a 'Response to submission report'.	Section 5

Consideration	Relevance	EIS ref
e) the public interest	The development is in the public interest as detailed in Sections 2 and 7.	Sections 2 and 7

Environmental Planning and Assessment Regulation 2021

This EIS has been prepared in line with form and content requirements of Section 192 of the Environmental Planning and Assessment Regulation. An overview of how the requirements of the Regulation have been satisfied is included in the table below.

Consideration	Relevance	EIS ref
Section 190		
Form of environmental impact statement	The EIS has been prepared in accordance with this section including consideration of the <i>State Significant Development Guidelines</i> .	All
Section 192		
Content of an environmental impact statement	The EIS includes all content required under this section.	All

Biodiversity Conservation Act 2016

Consideration	Relevance	EIS ref
Section 7.9		
- This section applies to— - an application for development consent under Part 4 of the Environmental Planning and Assessment Act 1979 for State significant development, and - an application for approval under Division 5.2 of the Environmental Planning and Assessment Act 1979 to carry out State significant infrastructure. - Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.	The site does not contain any biodiversity values land and a BDAR waiver is provided at Appendix 9, confirming that there are no impacts arising from development on habitats of any threatened species	Section 6.13 and Appendix 9

Consideration	Relevance	EIS ref
3. The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the Environmental Planning and Assessment Act 1979.		

Contaminated Land Management Act 1997

Consideration	Relevance	EIS ref
This Act establishes a process for investigating and (where appropriate) remediating land where contamination poses a significant risk of harm to human health or the environment.	Site contamination has been considered through the preparation of a Preliminary Site Investigation.	Section 6.6 and Appendix 14

Heritage Act 1977

Consideration	Relevance	EIS ref
The Heritage Act 1977 establishes a framework for the identification, conservation, and management of environmental heritage, including buildings, works, relics, and places of historical, cultural, or social significance	The site is not identified as a heritage item and there are no heritage items in proximity to the site.	Section 6.15 and Appendix 7

State Environmental Planning Policy (Biodiversity and Conservation) 2021

The *State Environmental Planning Policy (Biodiversity and Conservation) 2021* seeks to value, protect, conserve and manage the innate value and external benefits of NSW's natural environment and heritage.

Chapter/ Section	Consideration	Discussion	EIS ref
2. Vegetation in non-rural areas			

Chapter/ Section	Consideration	Discussion	EIS ref
Section 2	Chapter 2 of the State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity SEPP) states that a person must not clear vegetation in a non-rural area of the State to which Part 2.3 applies without the authority conferred by a permit granted by the council under that Part.	Information on existing trees to be removed is included in the Arboricultural Impact Assessment and Landscape Report and Plans which is submitted with this EIS. The documents advise that 32 trees are to be removed however, 14 trees are to be retained and 22 new trees are to be planted on site.	Section 6.4 and Appendix 32 Appendix 17

State Environmental Planning Policy (Housing) 2021

The *State Environmental Planning Policy (Housing) 2021* seeks to guide the delivery of the right number of homes in the right place and of the right type, to suit the changing needs of people living in NSW now and into the future.

The proposed development will contribute to housing diversity and affordability within the Ku-ring-gai LGA through the provision of additional dwelling types including in-fill affordable housing. An assessment of the relevant provisions is detailed below.

Chapter/ Section	Consideration	Discussion	EIS ref
2. Affordable housing			
Chapter 2	Development for affordable housing.	Part 2 of the Housing SEPP applies to in-fill affordable housing. A full assessment of this part is provided in the table below.	Appendix 4
4. Design of Residential Apartment Development			
Chapter 4	Design of residential apartment development	A comprehensive assessment of the proposed development against nine design quality principles under Schedule 9 of the Housing SEPP and consideration of the Apartment Design Guide is provided in the Apartment Design Guide Table prepared by PBD Architects.	Appendix 21
Chapter 6 - Low and mid-rise Housing			
164 Land to which this Chapter applies			
Chapter 6 Clause 164	(1) <i>This chapter applies to the whole of the State, other than the following—</i>	The provisions in this chapter are relevant to the proposed development.	Section 6

Chapter/ Section	Consideration	Discussion	EIS ref
	(a) bush fire prone land, (b) land identified as a coastal vulnerability area or a coastal wetlands and littoral rainforests area within the meaning of State Environmental Planning Policy (Resilience and Hazards) 2021, Chapter 2, (c) land to which Chapter 5 applies, (d) land that is a heritage item or on which a heritage item is located, (e) the following local government areas— (i) Bathurst Regional, (ii) City of Blue Mountains, (iii) City of Hawkesbury, (iv) Wollondilly,		
Part 4 Residential flat buildings and shop top housing			
Division 1 Preliminary			
Chapter 6			
Clause 174	Development permitted with development consent <i>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.</i>	Site is located within R3 Medium Density Residential Zone under the KLEP 2015	Section 3
Clause 175 (1)	Development standards— low- and mid-rise housing inner area <i>(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.</i>	This section applies given the site's R3 Medium Density Residential zoning under the KLEP 2015	Section 3

Chapter/ Section	Consideration	Discussion	EIS ref
Clause 175 (2)	<i>(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.</i>	The proposed development utilizes the bonus height provisions of Chapter 2 of the Housing SEPP. A Clause 4.6 variation request has been prepared.	Section 6.1 Appendix 6
177 Landscaping—residential flat buildings or shop top housing			
177 (1)	<i>This section applies to land in a low and mid rise housing area in Zone R3 Medium Density Residential or R4 High Density Residential.</i>	This section applies given the site's R3 Medium Residential zoning under the KLEP 2015	Section 3
177 (2)	<i>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.</i>	Complies	Section 6.4
178 Minimum lot size for residential flat buildings or shop top housing			
178 (1)	<i>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.</i>	This section applies given the site's R3 Medium Residential zoning under the KLEP 2015	N/A
178 (2)	<i>A requirement specified in another environmental planning instrument or development control plan in relation to the following does not apply to development that meets the standards in section 180(2) or (3)— (a) minimum lot size, (b) minimum lot width.</i>	Complies	Section 6.1

Chapter/ Section	Consideration	Discussion	EIS ref
180 Non-discretionary development standards—residential flat buildings and shop top housing in Zone R3 or R4			
180 (1)	<i>(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.</i>	This section applies given the site's R3 Medium Residential zoning under the KLEP 2015	N/A
180 (2)	<i>(2) The following non-discretionary development standards apply in relation to development on land in a low and mid rise housing inner area—</i> <i>(a) a maximum floor space ratio of 2.2:1,</i> <i>(b) for residential flat buildings—a maximum building of 22m,</i>	The development is utilizing the bonus height and FSR provisions of Chapter 2 of the Housing SEPP.	Section 4
Schedule 9 Design principles for residential apartment development			
Schedule 9 1-9	The proposed development will need to show consistency with the following design principles from Schedule 9 of the Housing SEPP: <i>1 Context and neighbourhood character</i> <i>2 Built form and scale</i> <i>3 Density</i> <i>4 Sustainability</i> <i>5 Landscape</i> <i>6 Amenity</i> <i>7 Safety</i> <i>8 Housing diversity and social interaction</i> <i>9 Aesthetics</i>	The assessment against Schedule 9 is provided in the Design Report.	Appendix 19

Section Division 1 Infill affordable housing	Comment
15C Development to which Division applies	

Section Division 1 Infill affordable housing	Comment
<i>This division applies to development that includes residential development if</i>	Noted. This division applies to the proposed development.
<i>a. the development is permitted with consent under Chapter 3, Part 4, Chapter 5, Chapter 6 or another environmental planning instrument, and</i>	
<i>b. the affordable housing component is at least 10%, and</i>	Complies. The affordable component is to be 15%.
<i>c. all or part of the development is carried out— for development on land in the Six Cities Region, other than in the City of Shoalhaven or Port Stephens local government area—in an accessible area, or for development on other land—within 800m walking distance of land in a relevant zone or an equivalent land use zone.</i>	The site is within an accessible area in the Six Cities Region noting its proximity to St Ives Village Centre and bus stops on Mona Vale Road and Killeaton Street.
<i>2. Affordable housing provided as part of development because of a requirement under another chapter of this policy, another environmental planning instrument or a planning agreement is not counted towards the affordable housing component under this division.</i>	Noted.
16 Affordable housing requirements for additional floor space ratio	
<i>1. The maximum floor space ratio for development that includes residential development to which this division applies is the maximum permissible floor space ratio for the development on the land plus an additional floor space ratio of up to 30%, based on the minimum affordable housing component calculated in accordance with subsection (2).</i>	This section requires the affordable housing contribution to be 15% of the maximum permissible FSR + 30%.
<i>2. The minimum affordable housing component, which must be at least 10%, is calculated as follows—</i> <i>affordable housing component = additional floor space ratio (as a percentage) ÷ 2</i>	The proposed development provides for 1,487.64m ² of the GFA as affordable housing.
<i>3. If the development includes residential flat buildings or shop top housing, the maximum building height for a building used for residential flat buildings or shop top housing is the maximum permissible building height for the development on the land plus an additional building height that is the same percentage as the additional floor space ratio permitted under subsection (1).</i>	Does not comply. The proposed development seeks to utilise the 30% bonus height and FSR incentives. A maximum building height of 28.6m and FSR of 2.86:1 is applied to the site.

Section Division 1 Infill affordable housing	Comment
	The proposed development has a maximum building height of 29.69m calculated in accordance with Merman Investments Pty Ltd v Woollahra Municipal Council [2021] NSWLEC 1582.
4. <i>This section does not apply to development on land for which there is no maximum permissible floor space ratio.</i>	Not Applicable.
19 Non-discretionary development standards	
2. <i>The following are non-discretionary development standards in relation to the residential development to which this division applies—</i> (a) <i>site area if the site area is at least 450 sqm</i>	Complies. The site area is 3,467.7 sqm.
(b) <i>a minimum landscaped area that is the lesser of—</i> (i) <i>35 sqm per dwelling, or</i> (ii) <i>30% of the site area,</i>	The development complies as it provides 37.7% landscaped area.
(c) <i>a deep soil zone on at least 15% of the site area, where—</i> (i) <i>each deep soil zone has minimum dimensions of 3m, and</i> (ii) <i>if practicable, at least 65% of the deep soil zone is located at the rear of the site,</i>	The proposal provides 16.6%.
(d) <i>living rooms and private open spaces in at least 70% of the dwellings receive at least 3 hours of direct solar access between 9am and 3pm at mid winter,</i>	Requirement equates to 52.5 units / 74 (70%) Proposal 56 Units / 7 (74.6%)
(e) <i>the following number of parking spaces for dwellings used for affordable housing—</i> (i) <i>for each dwelling containing 1 bedroom—at least 0.4 parking spaces,</i> (ii) <i>for each dwelling containing 2 bedrooms—at least 0.5 parking spaces,</i> (iii) <i>for each dwelling containing at least 3 bedrooms— at least 1 parking space,</i>	Required car parking spaces • 2, 2-bedroom units: 1 space provided • 10, 3-bedroom units: 10 spaces provided • Total 11 spaces Proposal complies.
(f) <i>the following number of parking spaces for dwellings not used for affordable housing—</i> (i) <i>for each dwelling containing 1 bedroom—at least 0.5 parking spaces,</i> (ii) <i>for each dwelling containing 2 bedrooms—at least 1 parking space,</i> (iii) <i>for each dwelling containing at least 3 bedrooms—at least 1.5 parking spaces,</i>	Required car parking spaces • 14, 2-bedroom units: 14 spaces provided • 48, 3-bedroom units: 72 spaces provided • Total 86 spaces Proposal complies.

Section Division 1 Infill affordable housing	Comment
<i>(g) the minimum internal area, if any, specified in the Apartment Design Guide for the type of residential development,</i>	Internal Areas are listed from the ADG below: • Studio: 35sqm • 1-bedroom: 50sqm • 2-bedrooms: 70sqm • 3-bedroom: 90sqm The proposed development complies with the requirements for internal areas.
19(3) Design requirements	
<i>3. Development consent must not be granted to development under this division unless the consent authority has considered whether the design of the residential development is compatible with— (a) the desirable elements of the character of the local area, or (b) for precincts undergoing transition—the desired future character of the precinct.</i>	Complies. The development will be compatible with the character of the local area and the desired future character of the area.
21 Must be used for affordable housing for at least 15 years	
<i>1. Development consent must not be granted to development under this division unless the consent authority is satisfied that for a period of at least 15 years commencing on the day an occupation certificate is issued for the development</i>	Complies. A condition of consent can be imposed to ensure the affordable housing is used for a minimum period of 15 years.
<i>a. the development will include the affordable housing component required for the development under section 16, 17 or 18, and</i>	
<i>b. the affordable housing component will be managed by a registered community housing provider.</i>	

State Environmental Planning Policy (Planning Systems) 2021

The *State Environmental Planning Policy (Planning) 2021* seeks to identify development which is state significant or regionally significant.

An assessment of the relevant provisions is detailed below.

Chapter/ Section	Consideration	Discussion	EIS ref
Schedule 1, Clause 26A			

Chapter/ Section	Consideration	Discussion	EIS ref
Section 2.6	Declaration of State Significant Development (Section 1 of this EIS).	The proposed development is declared SSD under the Schedule 1 (26A) of the Planning System SEPP as the development has an EDC of more than \$75 million, noting it is wholly residential, and provides more than 10% of the GFA for the purposes of affordable housing in the north district.	Section 4.1 and Appendix 4

State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* seeks to reduce risk and build resilience in the face of natural hazards as well as development-related hazards. An assessment of the relevant provisions is detailed below.

Chapter/ Section	Consideration	Discussion	EIS ref
2. Contamination and remediation to be considered in determining development application			
Section 4.6	<i>(1) A consent authority must not consent to the carrying out of any development on land unless—</i> <i>(f) it has considered whether the land is contaminated, and</i> <i>(g) 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</i> <i>(h) 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.</i>	A Preliminary Site Investigation (PSI) has been prepared by GSNE Services and included in Appendix 14. The PSI identifies areas of potential environmental concern within the site. Therefore, the PSI recommends that a Detailed Site Investigation (DSI) is to be undertaken to provide further information about the presence and extent of contamination on site prior to construction.	Appendix 14

State Environmental Planning Policy (Sustainable Building) 2022

The *State Environmental Planning Policy (Sustainable Building) 2022* (Sustainable Buildings SEPP) encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials.

Sustainability commitments and objectives have been incorporated into the design of the proposed development to achieve a high level of energy efficiency and sustainability.

Specific design elements have been integrated in the development to ensure the building embodies best practice sustainable design.

Chapter/ Section	Consideration	Discussion	EIS ref
Section 2.1	Standards for BASIX development and BASIX optional development.	An Ecologically Sustainable Development Report (ESD Report) is provided which demonstrates compliance with BASIX energy, water and thermal comfort targets as follows: • 60% energy • 40% water • Individual apartment NatHERS rating no less than 6 Stars • Average apartment NatHERS rating of at least 7 Stars, with the development expected to achieve an average of 7.6 Stars	Section 6.13 Appendix 15 Appendix 23

State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environmental Planning Policy (Transport and Infrastructure) 2021* seeks to guide the provision of well-designed and located infrastructure including transport. An assessment of the relevant provisions is detailed below.

Chapter/ Section	Consideration	Discussion	EIS ref
2. Infrastructure			

Chapter/ Section	Consideration	Discussion	EIS ref
Section 2.48	Section 2.48 provides that any development carried out within 5m of an exposed overhead electricity powerline is to be notified to the electricity supply authority and consideration given to any response received.	The site contains an overhead power line at its southern boundary. The application will therefore require referral to the relevant electricity supply authority for comment.	Section 4

Ku-ring-gai Local Environmental Plan 2015

Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015) regulates development throughout the is Ku-ring-gai area. As the *State Environmental Planning Policy (Housing 2021)* applies to the site, the LEP does not apply.

Notwithstanding, for consistency, an assessment against the provisions of the KLEP 2015 has been provided below.

Clause	Consideration	Discussion
2.2 Zoning	The site is zoned R3 Medium Density Residential form the KLEP 2015 with the stated objectives: <i>To provide for the housing needs of the community within a medium density residential environment.</i> <i>To provide a variety of housing types within a medium density residential environment.</i> <i>To enable other land uses that provide facilities or services to meet the day to day needs of residents.</i> <i>To provide a transition between low density residential housing and higher density forms of development.</i>	Clause 174 of the Housing SEPP permits residential flat buildings in a R3 medium density residential zone. - The proposed development provides 12 new affordable homes and 64 new market residential homes assisting to meet the housing needs within the Ku ring-gai LGA and increase supply in a well serviced location. - The proposed development will enhance the vitality of St Ives Shopping Village through higher foot fall traffic supporting long-term employment and retail diversity. - The proposed development includes both market residential and affordable housing with a mix of apartment sizes suited to a range of demographics. - The proposed development complements low density areas by relieving pressure for infill in traditionally detached housing zones.

Clause	Consideration	Discussion
4.3 Height of buildings	9.5m	Not applicable - Base height controls are provided under Chapter 6 of the Housing SEPP given the site is identified within a Low and mid-rise housing inner area. Additionally, given the provision of 15% of the total GFA for affordable housing, the proposal benefits from the bonuses under Section 16 of the Housing SEPP.
4.4 Floor space ratio	0.5:1	Not applicable - Base FSR controls are provided under Chapter 6 of the Housing SEPP given the site is identified within a Low and mid-rise housing inner area. Additionally, given the provision of 15% of the total GFA for affordable housing, the proposal benefits from the bonuses under Section 16 of the Housing SEPP.
5.10 Heritage conservation	Not applicable.	The site is not located within a heritage conservation area, and there are no heritage items on the site.
5.21 Flood planning	(1) The objectives of this clause are as follows— <i>(a) to minimise the flood risk to life and property associated with the use of land,</i> <i>(b) to allow development on land that is compatible with the flood function and behaviour on the land, taking into account projected changes as a result of climate change,</i> <i>(c) to avoid adverse or cumulative impacts on flood behaviour and the environment,</i> <i>(d) to enable the safe occupation and efficient evacuation of people in the event of a flood.</i>	The site is not identified as being flood affected on Council's flood mapping.

Clause	Consideration	Discussion
6.1 Acid Sulfate Soils	<i>Development consent is required for the carrying out of works described in the table to this subclause on land shown on the Acid Sulfate Soils Map as being of the class specified for those works.</i> <i>Works within 500 metres of adjacent Class 1, 2, 3 or 4 land that is below 5 metres Australian Height Datum and by which the water table is likely to be lowered below 1 metre Australian Height Datum on adjacent Class 1, 2, 3 or 4 land.</i> <i>(3) 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 in accordance with the Acid Sulfate Soils Manual and has been provided to the consent authority.</i>	The site is mapped for Class 5 acid sulfate soils. Notwithstanding, as demonstrated in the PSI, no acid sulfate soils have been found on site.
6.2 Earthworks	Development consent is required for earthworks.	Consent for earthworks is being sought via this SSD application.
6.5 Stormwater and water sensitive urban design	<i>(2) Before granting development consent to development on any land to which this Plan applies, the consent authority must be satisfied that—</i> <i>(a) water sensitive urban design principles are incorporated into the design of the development, and</i> <i>(b) riparian, stormwater and flooding measures are integrated, and</i> <i>(c) the stormwater management system includes all reasonable management actions to avoid any adverse impacts on the land to which the development is to be carried out, adjoining properties, native bushland, waterways and groundwater systems.</i>	Stormwater management is addressed at section 6.5.2.

Clause	Consideration	Discussion
6.6 Requirements for multi dwelling housing and residential flat buildings	<i>(2) Development consent must not be granted unless the lot has an area of at least 1,200 square metres and minimum dimensions (width and depth) of at least—</i> <i>(a) if the area of the land is less than 1,800 square metres—24 metres, or</i> <i>(b) if the area of the land is 1,800 square metres or more— 30 metres.</i>	The proposed development complies with this clause. The site has a total area of 3,467.7 sqm and a frontage of approximately 60m.