

Department of Planning, Housing and Infrastructure
Major Projects Assessment Team

Submission: Objection to Amended SSD Application
SSD-88948458 – Proposed Residential Flat Building with In-fill Affordable Housing
5–9 Cowan Road, St Ives

Dear Sir/Madam,

We write as long-term residents of Cowan Road and as directly affected neighbours to lodge our objection to the amended application for the proposed residential flat building with in-fill affordable housing at **5–9 Cowan Road, St Ives**.

We previously lodged an objection to the original proposal. Having now reviewed the amended application, we remain strongly opposed to the development.

In our opinion, this is not an amendment that reduces impact. It is an intensification dressed up as refinement.

The amended proposal remains fundamentally excessive in height, bulk, scale and density. It remains, in substance, a 9-storey residential flat building in a Cowan Road setting that is predominantly low-rise, landscaped and residential. The amended plans do not cure the original problem: the building is still out of all recognition with the local environment.

What has actually changed

The amended proposal does not reduce the impact on Cowan Road. On the contrary:

1. **The building is higher, not lower.**
The amended report confirms that the proposed height has increased from **29.69 metres to 30.6 metres**. This is above the already uplifted Housing SEPP bonus height of **28.6 metres**.
2. **There are more apartments, not fewer.**
The proposal has increased from **74 apartments to 77 apartments**, including two additional market apartments at Level 8.
3. **The total floor space has not been reduced.**
The gross floor area remains **9,917.6 sqm**. In substance, floor space has simply been redistributed rather than reduced.
4. **Communal open space has been reduced.**
The amended scheme reduces communal open space from **1,228.33 sqm to 971.6 sqm**, while increasing the number of dwellings.
5. **Parking has been reduced despite more dwellings.**
Parking has been reduced from **150 spaces to 125 spaces**, despite the increase in apartment numbers. This remains a serious issue for Cowan Road and the surrounding local street network.

1. Excessive height, bulk and mass remain the core problem

The amendment does not materially reduce the building envelope. A 9-storey apartment block remains an unacceptable built form response in this location, particularly when the report itself acknowledges that the immediate locality is generally single to two storeys, with higher built forms mainly associated with Mona Vale Road.

Cowan Road is not Mona Vale Road. It is a local residential street with a distinct landscaped character, limited road capacity, and a sensitive interface with established homes, the church, the golf course and the broader Ku-ring-gai garden suburb setting.

2. The height breach should not be dismissed as minor

The amended proposal exceeds the already generous bonus height available under the Housing SEPP. A further height increase to **30.6 metres** should not be characterised as minor or inconsequential.

In a low-rise residential context, an additional height breach is highly visible and materially increases the sense of dominance, bulk and overdevelopment. The fact that the amendment increases height rather than reduces it reinforces our concern that the proposal has not genuinely responded to the objections raised by residents or to the character of the locality.

3. Affordable housing should not be used to justify overdevelopment

We do not object to genuine affordable housing. Our objection is to the use of a limited affordable housing component as the planning lever for a permanent 9-storey building that overwhelms Cowan Road.

The affordable housing component is only a portion of the development and is required for a limited period. The physical building, however, would remain permanently. A short to medium-term affordable housing benefit should not be used to justify a permanent built form outcome that is excessive, intrusive and incompatible with the site and surrounding area.

4. The proposal remains incompatible with local character

The applicant relies heavily on proximity to St Ives Shopping Village. However, proximity to a shopping centre does not convert Cowan Road into a high-rise precinct.

The amended proposal still fails to provide a respectful transition to surrounding residential properties, the church, the golf course edge and the established landscaped character of Ku-ring-gai. It remains too tall, too bulky and too dense for this location.

The proposal continues to represent a significant departure from the prevailing character of Cowan Road and would set a deeply concerning precedent for similar overdevelopment in local residential streets.

5. Privacy and setback “fixes” prove the building is too large

The amended proposal relies on mitigation measures such as translucent glazing, privacy screens, balcony changes, reduced windows and reorientation of openings.

In our view, these measures do not demonstrate good design. They demonstrate that the building is being forced onto the site. These are mitigation devices for overdevelopment, not evidence that the development is appropriate.

A well-designed building should not need to rely so heavily on screening and defensive design measures to protect neighbouring amenity. The need for these measures confirms that the proposal remains excessive.

6. Traffic, parking and construction impacts remain unresolved

The amended proposal reduces parking while increasing the number of apartments. This is not a sensible or acceptable planning outcome for Cowan Road.

Cowan Road already experiences pressure from local residential traffic, shopping centre activity, service vehicles, delivery vehicles, visitors and surrounding local streets. The amended application does not adequately reflect the lived reality of traffic and parking conditions in Cowan Road, Killeaton Street and the surrounding network.

Construction impacts also remain a serious concern. A development of this scale would create prolonged disruption for residents, including truck movements, construction parking, noise, dust, safety issues and interference with normal residential access.

Conclusion

The amended application should be refused.

The amendments do not respond to the substance of community concern. They preserve the excessive floor space, increase the height, increase the number of apartments, reduce communal open space and reduce parking.

This is not a genuine reduction in impact. It is not a meaningful refinement. It is an intensification of an already excessive proposal.

In summary, the amended proposal:

- remains a 9-storey building in a predominantly low-rise residential setting;
- increases the proposed height;
- increases the number of apartments;
- retains the same gross floor area;
- reduces communal open space;
- reduces parking;
- relies on privacy screening and mitigation measures to manage impacts caused by excessive bulk;
- remains incompatible with the scale, character, amenity and traffic capacity of Cowan Road.

For these reasons, we strongly object to the amended application and request that the Department refuse SSD-88948458.

Yours faithfully,

Two handwritten signatures in black ink. The first signature on the left is 'K McIntock' and the second signature on the right is 'A McIntock'. Both signatures are written in a cursive, flowing style.

Kevin McIntock AM & Akke McIntock
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