

The Department of Planning, Housing and Infrastructure
Attention: State Significant Development Assessment Team
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Cc:
General Manager
Ku-ring-gai Council
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Pymble NSW 2073
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Date: 11th May 2026

Subject: Continued Formal Objection to SSD-88948458 – Proposed Residential Development at 5–9 Cowan Road, St Ives

Dear Sir/Madam,

I write as a long-term resident of Cowan Road, St Ives, to formally maintain and strengthen my objection to SSD-88948458 relating to the proposed redevelopment of 5–9 Cowan Road.

Having reviewed the Applicant's revised submission material, including the Submissions Report, revised Traffic Impact Assessment, visual impact material, architectural plans and the Clause 4.6 height variation request, I remain firmly opposed to the proposal. The Applicant has actually made no reference to the concerns raised in my original objection and has made minimal, to no positive changes to address the concerns raised.

The revised application does not resolve or even attempt to address some of the fundamental concerns I had initially raised relating to:

- Incomplete traffic assessments – the “revised plans” maintain their basis of a survey within a mid-winter work day, with no allowance for higher traffic in weekends and evenings for the church activities, elevated shopping visits outside of the survey hours assessed and at any time sport or local activities are happening on the oval.
- Construction traffic concerns – I note that heavy 18m trucks will be turning right into the site and exiting the site in the direction of arrival. Can it be guaranteed the space will be available for this? When one large truck is on-site, where will the next one wait (there is no room along Cowan Road)? For such a massive development, the Cowan Road safety measures recently implemented will be damaged and significant additional safety concerns will be raised. I also note that the Applicant expects many of the trades who will work on site to take public transport to work.....when has this ever happened in practice? Where will all the trades park before the car park is open? I also note that the development will require 6 meters either side of the entrance, removing valuable on street parking for current residents.
- Pedestrian safety concerns not assessed.

- Consideration of current nearby developments – the Applicant maintains the information is not available. Residents have seen the relevant development applications for the site, so why has the Applicant not made any effort to make the assessment.

It is very clear that a development of such scale is totally inappropriate and out of character with the established properties of Cowan Road, and more suitable to a high density area such as Chatswood, where a real transport hub is available. The proposal has many issues, being excessive in terms of height and bulk and will cause significant traffic and pedestrian safety issues which have not been thoroughly addressed or even considered.

I understand Ku-ring-gai Council has also identified many issues and has formally objected accordingly. The “revisions” have made no bona-fide attempt to address any significant issues and are, quite frankly, insulting to long standing residents who value the local community and those living in it. I even note the inclusion of a golf simulator area in the proposal as part of the community area! How are residents, who will be materially impacted by the excessive bulk of the development together with the permanent traffic and pedestrian safety issues, expected to react to this use of space when the proposal is already significantly too large in all respects?

The revised application appears to acknowledge widespread non-compliance with planning controls and Apartment Design Guide requirements, while attempting to justify those variations rather than genuinely resolving them.

In summary therefore, the main aspects required to be revisited include:

1. Excessive Height, Bulk and Visual Dominance

The proposal continues to seek a building height substantially above the applicable planning controls and wishes to build to almost 30 metres in height, with the visual material submitted by the Applicant itself demonstrating that the proposal remains substantially oversized for the site compared to all nearby buildings. The proposal reads visually as a metropolitan-scale apartment complex rather than a contextual suburban development appropriate for Cowan Road and the surrounding locality.

The revised proposal does not materially reduce the overdevelopment of the site. Instead, it largely attempts to justify continued departures from planning controls through reliance on affordable housing bonus provisions and planning flexibility arguments, and all while including a golf simulator!

I understand the affordable housing incentives under the Housing SEPP were never intended to create an automatic entitlement to excessive height and bulk irrespective of local impacts.

2. Increased Density Despite Claimed “Refinements”

Despite being presented as a revised and improved design, the proposal now increases apartment numbers from 74 to 77 dwellings.

The revised proposal therefore represents a backwards step from the original development rather than a meaningful reduction in impact.

3. Failure to Properly Address Cumulative Traffic Impacts

The revised Traffic Impact Assessment continues to rely on inappropriate studies which do not coincide with the real traffic conditions currently experienced by residents and visitors to the shopping centre, church and local area.

The report still fails to adequately consider:

- weekend traffic conditions;
- school, sporting and church-related traffic peaks;
- cumulative impacts arising from nearby developments including 46–50 Cowan Road;
- cumulative construction traffic impacts;
- observed queuing conditions at Mona Vale Road and Cowan Road; and
- the broader traffic consequences of Housing SEPP densification throughout the precinct.

The report also continues to rely on assumptions more appropriate to transit-oriented urban centres rather than a car-dependent suburb such as St Ives.

The report itself acknowledges that:

- there is no nearby train station; and
- many bus services operate only once or twice per hour.

Despite this, the Applicant continues to rely on low trip-generation assumptions and reduced car dependency modelling. This is unrealistic and significantly understates likely traffic impacts.

4. Pedestrian Safety Remains Inadequately Addressed

The revised submission still fails to properly assess pedestrian safety impacts, particularly for elderly residents and families accessing St Ives Shopping Village and surrounding community facilities.

The development will significantly increase pedestrian movements in an area where:

- there are no controlled pedestrian crossings;
- there are no traffic lights at Cowan Road and Killeaton Street;
- traffic congestion already creates unsafe crossing conditions;
- pedestrian refuge infrastructure is inadequate; and
- the surrounding population includes a high proportion of older residents.

The revised documentation continues to make broad statements regarding “adequate pedestrian facilities” without undertaking any meaningful assessment of:

- pedestrian delay;

- accessibility;
- disability access;
- pedestrian conflict points; or
- pedestrian risk associated with increased vehicle movements.

5. Further council objections

Ku-ring-gai council have also raised significant concerns as follows:

- Overshadowing and Solar Access Concerns
- Landscaping, Deep Soil and Tree Retention Concerns
- Ground Floor Residential Amenity Concerns

Accordingly, I respectfully request that the Department:

1. Refuse the current proposal in its present form; or alternatively
2. Require:
 - a fully revised and independent cumulative Transport Impact Assessment;
 - expanded pedestrian safety assessment;
 - revised height and bulk controls;
 - improved setbacks and deep soil provision;
 - meaningful reduction in scale and density;
 - further comparative overshadowing analysis; and
 - further consultation with Council and affected residents.

I respectfully request that this objection be given full consideration prior to any determination of SSD-88948458.

Yours faithfully,



Dave Boorman

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