

Ms Adela Murimba
Planner
NSW Department of Planning, Housing and Infrastructure
Submitted via the NSW Major Projects Portal

3 June 2025

Dear Ms Murimba,

Re: SSD-81890707 10,14 &14 a Stanhope Road Killara

Thank you for the opportunity to provide feedback on the State Significant Development Application proposal at 10, 14 &14a Stanhope Road Killara.

Friends of Ku-ring-gai Environment (FOKE) have been strong advocates for the protection of Ku-ring-gai's neighbourhood character, environment, heritage and liveability for the past 30 years.

FOKE wishes to express its objection to the proposed development for the following reasons:

Statutory Context

The proponent has not taken into consideration mandatory statutory factors that the consent authority is obligated to take into account when assessing and determining DA's, including:

- Ku-ring-gai Council's LEP 2015 and DCP, as required under Section 4.15 of the EPAA Act 1979
- The Apartment Design Guide
- The SEPP Housing Guide 2021

In FOKE's view the SSD does not comply with the ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 - SECT 1.3 Objects of Act *a) (b), (c), (d), (e), (f), (g), (h), (i), (j)*.

Design Quality

The proposal:

- Fails to demonstrate a high level of environmental amenity for the surrounding residential and sensitive land use - particularly in the regard to the high quality architectural and heritage listed homes surrounding the proposal.
- Is too high and bulky (3 buildings, ranging from part 5/6 storey to 9/10 storey at the rear of the site). This would have negative impacts on shadowing / privacy / solar access / streetscape / character / amenity and views.
- The overall size of the proposed development is too large and would negatively impact on the surrounding neighbourhood context of 1-2 storey houses, as well as generate excess traffic from the site.

2016 NATIONAL TRUST HERITAGE AWARDS HIGHLY COMMENDED

2009 NATIONAL TRUST HERITAGE AWARDS HIGHLY COMMENDED

2008 NSW GOVERNMENT HERITAGE VOLUNTEERS AWARD

2000 FOKE, WINNER, NSW HERITAGE OFFICE CULTURAL HERITAGE CONSERVATION AWARD

"HERITAGE WATCH OVER OUR PLACE OF NATIONAL SIGNIFICANCE –KU-RING-GAI"

KEEP AUSTRALIA BEAUTIFUL COUNCIL (NSW) METRO PRIDE AWARDS.

Heritage

FOKE has recently written to the Heritage Council of NSW supporting the Heritage Nomination of 14 Stanhope Road, Killara under Criteria (b) and (d).

FOKE affirms that:

- No. 14 Stanhope Road has heritage value to community organisations such as Friends of Ku-ring-gai Environment (FOKE);
- It is featured on local heritage walking tours in Ku-ring-gai that have been conducted during several National Trust Heritage Festivals;
- It has a well-documented association with Dr Margot Hentze (1909-1947), a person of historical, cultural and intellectual significance to New South Wales.

The SSD-81890707 proposal would also:

- Negatively impact on the surrounding heritage, including the Stanhope Road Conservation Area
- Negatively impact on local heritage items listed on the Ku-ring-gai Local Environmental Plan 2015 at:
 - 2 Stanhope Road, “Conjola”
 - 3 Stanhope Road
 - 4 Stanhope Road, “Waipori”
 - 5 Stanhope Road, “Rydal Mount”
 - 6 Stanhope Road, “Redgum”
 - 7 Stanhope Road
 - 12 Stanhope Road, “Crana”
 - 18 Stanhope Road, “Culworth”/ “Normanhurst”
 - 21 Stanhope Road, “Delville”

Traffic

- The projected change in traffic generation potential of the site will have major negative implications on the road network, road capacity, vehicular access and street parking/loading.
- Stanhope Road does not have the capacity to cope with the proposed additional 195 cars entering and exiting this significant entry and exit road to the Pacific Highway.
- Already there is insufficient street parking in the area. The proposed development would compound and entrench the unavailability of street parking and make it harder for cars and trucks to drive over the railway bridge to access the eastern side of Stanhope Road.
- The additional traffic generated from the proposed development would create danger for drivers and, particularly, pedestrians. It will also endanger the safety of its occupants and neighbouring residents, particularly during emergency events, when emergency vehicles (ambulances, fire engines, police) may be required to assist them but may not be able to reach them to provide lifesaving services.
- The impact of the additional traffic that would be generated by the proposed development, particularly during peak periods with traffic entering and exiting the Pacific Highway.

Visual Impacts

The proposal would have a negative visual impact on:

- Stanhope Road as it is one of Killara's most significant heritage streets with its streetscape of magnificent trees (on the western side of the railway line) that make it one of the most visually aesthetic streets in Killara and Ku-ring-gai.

- It would have adverse impacts on neighbouring properties at 2, 4, 4a, 6, 6a, 8 and 12, 16, 16a and 18 Stanhope Road, Killara.
- The proposed 10-storey height would have a negative impact on the landscape as the built form would go beyond the existing canopy of trees and 'greenery'. This would fundamentally reverse the existing character of the area where the 'natural' form dominates the 'built' form. A 10-storey structure would, thus, have a negative and irreversible impact on Killara's character, heritage and environment.

Trees and Landscaping

- The proponent's Arborist acknowledges the high significance of vegetation on the site identified as both Blue Gum High Forest (BGHF) and Sydney Turpentine Ironbark Forest (STIF) and that there are several significant species on the site, including 5 *Eucalyptus saligna* (Blue Gum trees), 1 *Eucalyptus resinifera* (Red Mahogany), 7 *Waterhousia floribunda* (Water gum), 1 *Eucalyptus paniculata* (Grey Ironbark), 5 *Lophostemon confertus* (Brushbox).
- Despite assurances that the trees will be protected on site, the community is used to such 'promises to protect trees' followed by reasons to remove them, e.g., that their health has been compromised by the building works. That the Arborist for this proposal makes the following statement verifies community concerns:
Should the recommendations not be viable or achievable for whatever reason, with factors outside the control of the Arborist and mainly due to other planning controls, then consideration must be given to the removal of single specimens. The loss of any tree is indeed unfortunate but not necessarily detrimental as there needs to be acknowledgement of the newly created built form and its overall impact to not just vegetation but the area in general. [page 9].
- Despite the Arborist being satisfied that no design changes or conditions need to be imposed for the retention of T1-T5, T8, T14 – T19 there is concern with the following sentence that, however, this will be "dependent on the proposed stormwater design for the site and must be reassessed a later stage".
- There does not appear to be any setback for landscaping on the rear of the site (western corner).
- Nor does there appear to be any tree screening for the two properties that the proposal would tower over.
- The proposed building would need to be reduced to ensure that the canopy of T18 and T19 trees will have space.

Biodiversity

- The applicant's biodiversity statement is grossly inadequate and ignores both Commonwealth and NSW environmental legislation to protect endangered species:
 - "The site is identified as containing biodiversity values in the north-eastern and south-eastern corners as shown in Figure 19 below. The biodiversity values are understood to be associated with the Blue Gum High Forest which is a common tree found in the Ku-ring-gai area. These trees provide important habitat and shelter for native animals including the Grey-headed Flying Fox and Glossy Black Cockatoo which are both endangered species."
- The Biodiversity Development Assessment Report is insufficient and does not pay sufficient attention to key threatening processes – of fragmentation of habitat, loss of trees, impact of construction and accompanying noise.
- The proposal is located in an important wildlife corridor connecting the Lane Cove National Park to the Garigal National Park via the garden suburb of Killara and, as such, is of environmental significance. It is also part of **Ku-ring-gai's Green Corridors**, supporting

biodiversity including its Critically Endangered Blue Gum High Forest and Sydney Turpentine Ironbark Forest (STIF).

- The ABC radio program, How many animals REALLY live in your house? <https://www.abc.net.au/listen/programs/what-the-duck/animalsinyourhouse/103411034> identified over 1,150 unique species of animals, plants and fungi in one Brisbane suburban house that appeared to have minimal biodiversity. Yet over a 12-month period it identified over 1,000 species. The applicant of SSD-81890707 needs to provide a similar long-term ecological study for the 10,14 & 14a Stanhope Road, Killara site as the current report is grossly insufficient.

Social Impact

- The proposal impacts on the existing residents whose homes and amenities are irreversibly negatively impacted.
- The proponent offers no community benefits but impacts heavily on existing infrastructure and community services.
- The development would dramatically and negatively impact the sense of community and what residents value about living in Killara.
- Already many residents feel a sense of 'grief' that their home and neighbourhood could significantly and irreversibly change due to the proposal.
- The loss of trees and tree canopy would not only impact directly on residents but cumulatively on connectivity of canopy as well as impact adjoining remnants of endangered and critical ecological communities and connecting National Parks.

Affordable Housing

- The proposal would fail to promote genuine and long-term affordable housing given its provision to provide affordable housing for only a 15-year period.
- The TOD and in-fill affordable housing components of the proposal would be managed by a registered community housing provider (being Echo Realty). The number of affordable units (3) to be managed in perpetuity is insufficient considering the housing crisis, as is only 23 affordable units (only for a maximum of 15 years).

Insufficient Environmental and Infrastructure Studies

- The applicant fails to provide critical studies (e.g., ecological, traffic, parking, water, stormwater run-off, water pressure, sewerage, energy and utilities) to support the intensified SSD proposal of 3-10 storeys. Without these verified independent studies, the SSD risks unsustainable development, straining local infrastructure and exacerbating environmental degradation.

Conclusion

Friends of Ku-ring-gai Environment (FOKE) is of the view that the State Significant Development Application proposal for **10, 14 & 14a Stanhope Road, Killara** (SSD-81890707) should be rejected as it will have a negative and detrimental impact on heritage, environment, traffic, urban design, neighbourhood character, visual amenity, liveability, tree canopy, open space, infrastructure and community benefit. As such, FOKE requests that this SSD be rejected.

Thank you for considering FOKE's submission.

It is to be hoped that the NSW DPIH will consider our concerns and reject the proposal.

Yours faithfully,

Kathy Cowley

Kathy Cowley
PRESIDENT

- cc Ku-ring-gai Mayor and Councillors
- cc Matt Cross MP Member for Davidson
- cc The Hon Alister Henskens SC MP Member for Wahroonga
- cc The Hon Scott Farlow MP Shadow Minister for Planning

References

[independent-heritage-advice-to-ku-ring-ai-council-housing-reforms-and-tod-sepp \(1\)Download](#)

[OMC 30102024 AGN AT EXTRA Attachment 15886 3-Draft-HeritageDownload](#)

[appendix-4-land-eco-consulting-independent-assessment-of-potential-ecological-impacts-1Download](#)