

## Ground for Refusal

- 1) An SSDA application has been lodged for 135 apartments under the State TOD ( NSW Housing SEPP) which would not be permitted under Kuringgai Councils alternative TOD. It will result in a series of 5-10 storey apartment buildings within a predominately two storey low density zone (R2). The development will be incongruous with the resolved Council TOD. The development will be an exemplar of poor planning due to Council and State inability to cooperate.
- 2) The proposal is of low architectural/design merit significantly below professional urban design standards. The project has not undertaken a State Significant Design review. The impact of bulk, height and scale on adjoining housings has not been considered.
- 3) The proposal significantly exceeds the permitted planning heights and other planning standards without justification and mitigation of the impacts on the surrounding area.
- 4) The proposal fails to integrate with the character housing streetscape and gives token consideration of nearby heritage items.
- 5) The proposal includes affordable housing under the Housing SEPP to utilize the SSDA planning pathway to secure permissibility using the proforma letter from Echo Realty. Similar letters have featured in dozens of SSDA's and are a perverse mechanism to avoid the scrutiny and accountability of a normal DA application.
- 6) The proposal has failed to meet consultation standards with insufficient and misleading information to solicit genuine informed feedback.



**Without wholesale redesign this application should be rejected.**  
**There are significant ground for refusal.**

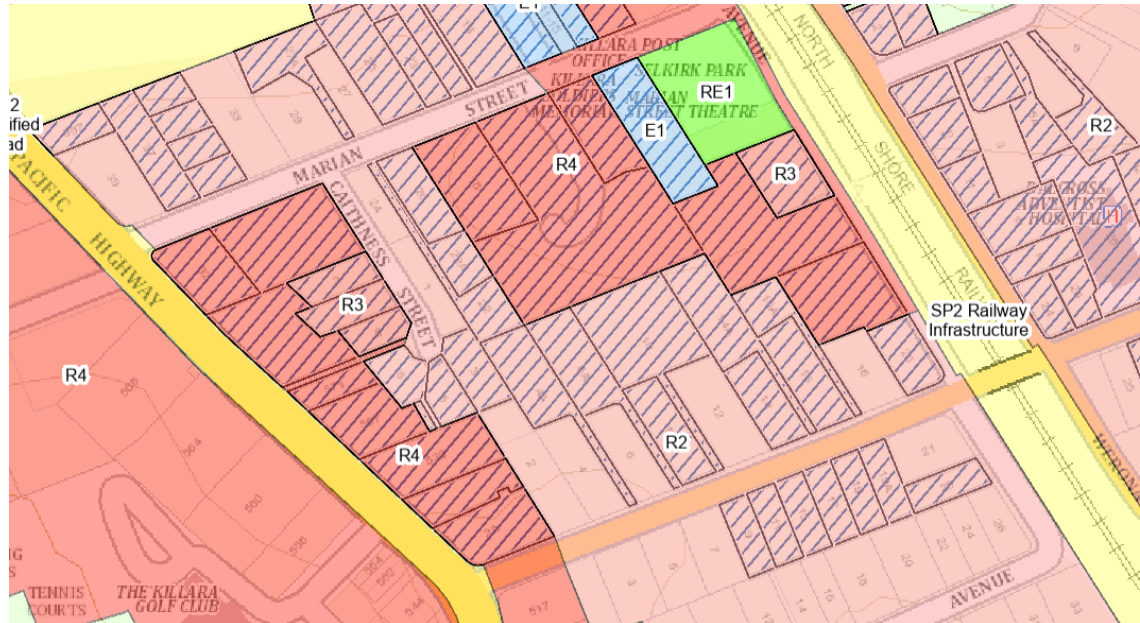
# 10,14,14a Stanhope Road SSDA Submission



The proposal fails to address the future context of the precinct which is to remain low scale residential in character. The Council's TOD's planning excludes the proposed form of development. Approval will result in an isolated series of 10 storey building in an area designated to 2 storey domestic.



**It out of context with the current and future urban forms**



# 10,14,14a Stanhope Road SSDA Submission

The buildings are poorly designed and configured. The form, bulk, scale are excessive, they lack articulation and refinement and should be reject by the States Design Panel. The minimum setbacks create monolithic building facades in contravention of the principles in the Apartment Design Guide.

**Objective 4M-1**  
Building facades provide visual interest along the street while respecting the character of the local area

**Design guidance**

Design solutions for front building facades may include:

- a composition of varied building elements
- a defined base, middle and top of buildings
- revealing and concealing certain elements
- changes in texture, material, detail and colour to modify the prominence of elements

Building services should be integrated within the overall facade

Building facades should be well resolved with an appropriate scale and proportion to the streetscape and human scale. Design solutions may include:

- well composed horizontal and vertical elements
- variation in floor heights to enhance the human scale
- elements that are proportional and arranged in patterns
- public artwork or treatments to exterior blank walls
- grouping of floors or elements such as balconies and windows on taller buildings

**Objective 4N-1**

Roof treatments are integrated into the building design and positively respond to the street

**Design guidance**

Roof design relates to the street. Design solutions may include:

- special roof features and strong corners
- use of skillion or very low pitch hipped roofs
- breaking down the massing of the roof by using smaller elements to avoid bulk
- using materials or a pitched form complementary to adjacent buildings

Roof treatments should be integrated with the building design. Design solutions may include:

- roof design proportionate to the overall building size, scale and form
- roof materials compliment the building
- service elements are integrated



## Poor Design that fails to meet the ADG





## 10,14,14a Stanhope Road SSDA Submission

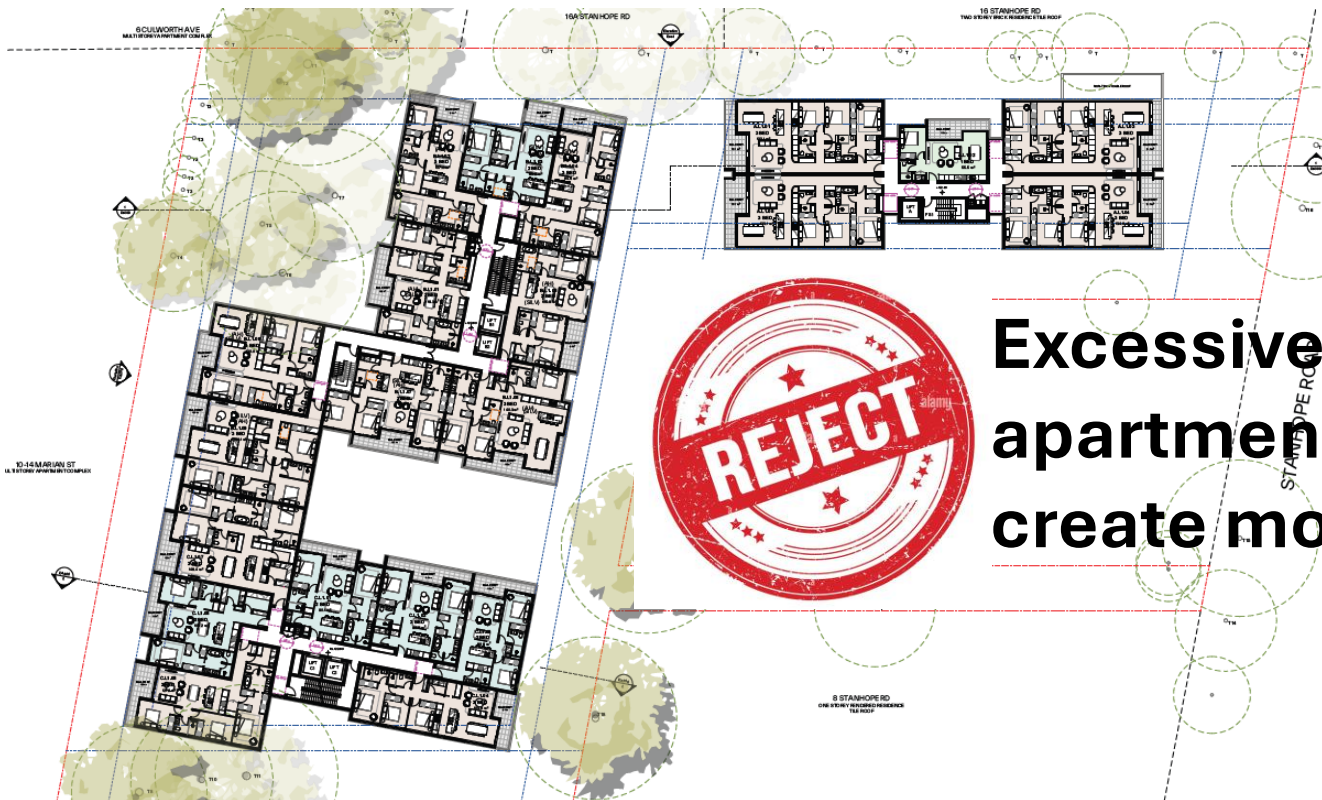
The relaxation request to exceed the permissible height should be rejected. The buildings are of a low design standard and have a detrimental visual impact. Any additional height combined with the poor architectural composition (bulk and scale) is unjustified. Additionally, the building fronting Stanhope Road exceeds residential height (9.5m) and is out of scale for a suburban street and detrimentally impacts the Heritage streetscape and the adjacent Heritage items



**Additional  
Height**

# 10,14,14a Stanhope Road SSDA Submission

The buildings are monolithic and represent over development of the site. The footprint is excessive leading to large unarticulated facades, bulky buildings that are out of scale and character with the area. The setbacks are at the minimum under the ADG exacerbating poor articulation. The impacts is unacceptable, and the design needs to be significantly altered to mitigate this



**Excessive number of  
apartments per floor  
create monolithic forms.**



## 10,14,14a Stanhope Road SSDA Submission

The proposal superficially considers the impact on the Heritage Conservation area and the Heritage Items, particularly 12 and 18 Stanhope Road. The proposal removes a 1-2 storey Federation era and replaces it with a 4-5 storey modern apartment building, a form out of context and incongruous architecturally.

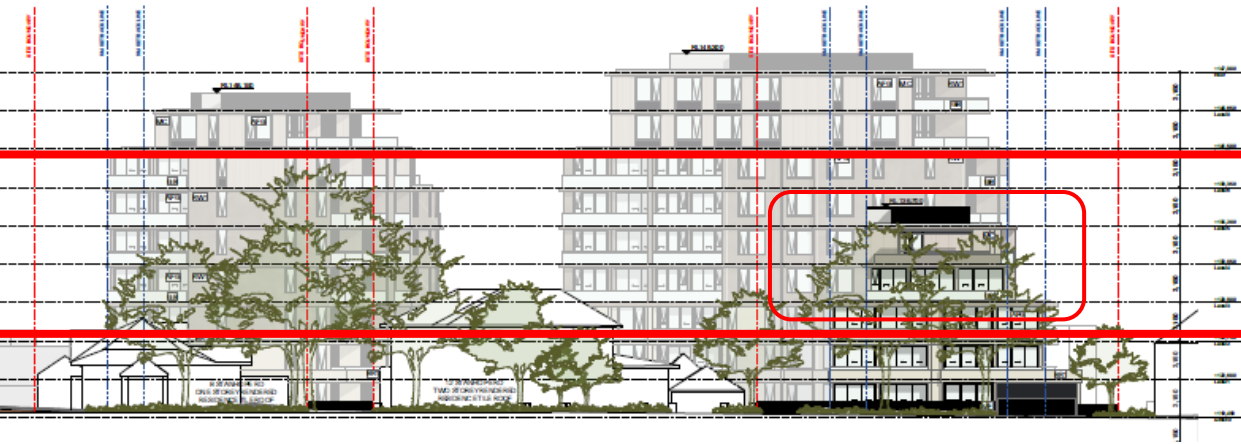


**Heritage is only  
superficially  
considered at best**

12 and 18 Stanhope Road are Heritage Items under the LEP



# 10,14,14a Stanhope Road SSDA Submission

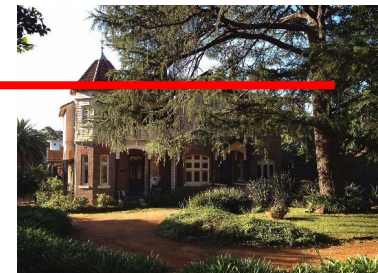
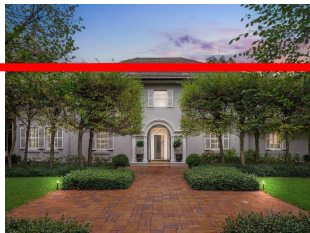


No justification for breaching height limits -Remove

Impact on Streetscape –design fails to resolve bulk height and scale  
Remove levels above 9.5 m height

Scale and architectural form requires significant improvement to warrant approval.

## Streetscape and Context



# 10,14,14a Stanhope Road SSDA Submission



21<sup>st</sup> March 2025

Stanhope Road Residence Holding Pty Ltd  
Michael Gee  
Development Manager  
Suite G02, 22 Atchison St,  
St Leonards NSW 2065

By Email: [michaelg@cpdm.com.au](mailto:michaelg@cpdm.com.au)

Dear Michael,

**RE: 10, 14 & 14A Stanhope Rd, Killara NSW 2071**

We write to confirm that EchoRealty NSW & ACT Limited (EchoRealty) would be pleased to manage the affordable housing to be developed at 10, 14 & 14A Stanhope Road, Killara NSW 2071 legally identified as Lot B DP 326483, Lot 1 DP 224907 and Lot 2 DP 224907 by Stanhope Rd Residence Holding Pty Ltd for a period of not less than 15 years for the affordable housing provided under the in-fill affordable housing provisions of the Housing SEPP and in perpetuity for the additional affordable dwellings provided under the TOD provisions of the Housing SEPP.

EchoRealty understands that CPDM Pty Ltd is the applicant of the SSDA and submitted the application on behalf of Stanhope Rd Residence Holding Pty Ltd.

EchoRealty is a registered Community Housing Provider based in Parramatta with operations in NSW, ACT and Victoria. It is the largest provider of affordable housing in Australia and forms part of the Evolve Housing Group, who boasts a successful track record in managing community housing assets for over 30 years.

We look forward to working closely with the Developer to enter into a suitable agreement for the management of the affordable housing at the Property in due course.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Charlie Souma".

Charlie Souma  
Group General Manager, Affordable Housing Services

A requirement of the SSDA planning pathway is the incorporation of Affordable Housing Managed by a Community Housing Provider.(CHP)

Proforma letters have been used in dozens of SSDA but does not ensure bonafide affordable housing will be delivered. It renders the application pathway invalid.



## Validity of Application



# 10,14,14a Stanhope Road SSDA Submission

A new, high quality residential development is proposed at 10, 14 and 14a Stanhope Road, Killara.

The site is within the Killara Station Transport Orientated Development Precinct, a NSW Government initiative which enables residential apartment buildings and encourages the provision of more housing in areas with strong transport connections.

A State Significant Development Application for the proposal is being prepared for submission to the Department of Planning, Housing and Infrastructure (DPHI) in the coming months.

CPDM have been appointed to manage the design and delivery of the development. CPDM are a development and project delivery consultancy with an impressive depth of knowledge and experience in delivering residential developments.

It is proposed that up to 17% of the apartments will provide affordable housing. Affordable housing is not the same as social housing. These apartments will provide much-needed rental accommodation for essential workers such as child care educators, teachers, hospital workers, and police officers.



Insufficient and misleading community Consultation has been undertaken for the project. For a project of such scale it did not provide adequate information for feedback. The graphics and content misrepresented the projects impact. It barely informed! It failed to meet SSDA requirements.

## IAP2 SPECTRUM OF PUBLIC PARTICIPATION

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
GOAL	To provide balanced and objective information in a timely manner.	To obtain feedback on analysis, issues, alternatives and decisions.	To work with the public to make sure that concerns and aspirations are considered and understood.	To partner with the public in each aspect of the decision-making.	To place final decision-making in the hands of the public.
PROMISE	"We will keep you informed"	"We will listen to and acknowledge your concerns."	"We will work with you to ensure your concerns and aspirations are directly reflected in the decisions made."	"We will look to you for advice and innovation and incorporate this in decisions as much as possible."	"We will implement what you decide."



## Insufficient Community Consultation